



REGISTRATION POLICY: REIMBURSEMENT OF ANNUAL FEES

BACKGROUND

The Pharmacy Act of Nova Scotia and its associated Regulations state that when a pharmacist licenses each year, the licence is valid until Dec 31st of that licensing year, unless it is specifically suspended or revoked. Therefore, unless a licence is specifically suspended or revoked, it is valid until Dec 31st and the pharmacist is authorized to practice pharmacy in Nova Scotia. Although not specifically addressed in the legislation, a pharmacist may ask to be removed from the register of practicing pharmacists prior to the end of any licensing year. In such cases, notification protocols similar to those associated with licence suspensions or revocations must be carried out by the NSCP and the pharmacist must surrender his or her licence to the Registrar.

Periodically, the NSCP Council receives requests from pharmacists for reimbursement of their annual fees because, for example, they have moved out of the province shortly after submitting payment of these fees. In response to these requests, the NSCP Council considered the following:

- When a pharmacist is licensed on Jan 1st and an official Certificate of Standing is provided to that pharmacist and/or to pharmacy regulatory authorities in other jurisdictions, the Certificate states that the licence status of that pharmacist is valid until Dec 31st of that year. If the NSCP refunds a portion of the pharmacist's licensing fee, the licence can no longer be valid and the NSCP is required to take steps to officially withdraw the previous confirmation of licence by providing advisories to all the pertinent pharmacy regulatory authorities, employers, and public, informing them that the official Certificate provided earlier is no longer valid. If the registrant is in possession of the original Certificate of Standing, it is impossible for the NSCP to confirm who may have received copies of and relied upon the Certificate.
- In addition to the required advisories noted above, the NSCP is obliged to advise other organizations and affected parties that depend on its list of licensed registrants (i.e. the official "register") of any change in licensing status of a registrant. For example, the Provider Registry of the provincial DIS/Electronic Health Record uses the NSCP's official register of practising pharmacists. This list of licensed pharmacists is used to ensure the privacy and confidentiality of patients and their health information (only those on the official register will be provided with access to confidential information). In accordance with legal agreements made with these parties, once a pharmacist is no longer licensed, the NSCP is required to notify them, in a manner similar to the notifications provided when a pharmacist's licence is suspended or revoked.
- Grants and membership fees to external stakeholders, including the Canadian Council for the Accreditation of Pharmacy Programs and the National Association of Pharmacy Regulatory Authorities, are calculated using a per capita model based upon registration numbers as of Jan 1st each year. In order to be fiscally prudent, the NSCP needs to re-coup these costs along with the administration costs associated with the annual renewal process, which includes reviewing and approving continuing

education/professional development, processing renewal applications, handling fees, and updating the provincial membership database/register, the Canadian Institute for Health Information database, etc.

Based upon the regulatory requirements and administrative/financial logistics stated above, and because of the reliance of the NSCP's stakeholders on the information provided by the NSCP as to the status of its registrants, the NSCP Council has approved the following policy on the reimbursement of annual fees.

POLICY

If a pharmacist voluntarily resigns and requests reimbursement of annual licence fees prior to the end of December 31st of any year, the NSCP will reimburse the pharmacist 100% of the fee paid for the upcoming licensing year.

If a pharmacist voluntarily resigns and requests reimbursement of annual licence fees on or after January 1st of any year, no reimbursement will be considered for that licensing year.

Approved by Council: October 2012