



Canadian Association of Pharmacy Students and Interns  
144 College Street  
Toronto, Ontario  
M5S 3M2

Dear Pharmacy Examining Board of Canada,

November 8<sup>th</sup>, 2020

I am writing this letter on behalf of 3000 members of the Canadian Association of Pharmacy Students and Interns to express our concern regarding the recent cancellation of the pharmacy licensing board exam scheduled for November 8<sup>th</sup>, 2020 in Toronto, ON and the significant reduction in capacity in Ottawa, ON.

It is unacceptable that the exam candidates were informed less than 48 hours in advance of their exam. It was evident that the COVID-19 numbers were increasing in Southern Ontario, and the exam candidates could have been notified in a reasonable time frame to allow them to take a break from studying, avoid them from taking time off work, and in some cases – travelling to Toronto/Ottawa. Students have been studying for this exam since they signed up in May, and the paucity of communication between decision makers and exam candidates is a disservice to student wellness. This is now the second time the exam has been rescheduled, and with the influenza season approaching and COVID-19 numbers still increasing, it is hard to imagine that another sitting will be made available in the near future.

A contingency plan outlining the steps PEBC and the Ontario College of Pharmacists would take if a cancellation was to occur also should have been provided to the exam candidates. The planning of these exams has lacked transparency.

I am also disappointed to hear that no efforts of a contingency plan have been communicated to students. This needs to be done. Some suggestions that have been brought forward include virtual OSCEs/ remote MCQs, adding additional sites that abide by the health authority's mandate, providing full provisional licensing to exam candidates after they complete 'x' amount of hours as pharmacy interns. Pharmacists have proven essential during these difficult times, and exam candidates need the opportunity to either write their exam in a different capacity in a timely manner or receive temporary licenses, which has been done successfully by the College of Pharmacists of Manitoba for recent graduates.

This issue affects the mental, physical, psychological and financial wellbeing of hundreds of recent graduates in Ontario. The decisions and actions that are made today have the potential to prevent a backlog in the system and allow the graduating class of 2021 to write their exams and become licensed on-time. This issue needs to be dealt with immediately.

As the National pharmacy students' association, CAPSI is willing to provide assistance to resolve this issue in an efficient manner. Please contact Morgan Patrick, the National President with your request at [pres@capsi.ca](mailto:pres@capsi.ca)

A handwritten signature in black ink, appearing to read 'M. Patrick'.

Morgan Patrick

National President  
Canadian Association of Pharmacy Students and Interns (CAPSI)  
University of Alberta, Faculty of Pharmacy and Pharmaceutical Sciences, PharmD Candidate, Class of 2021  
[pres@capsi.ca](mailto:pres@capsi.ca)



# The Pharmacy Examining Board of Canada

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## Le Bureau des examinateurs en pharmacie du Canada

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November 13, 2020

Morgan Patrick, National President  
Canadian Association of Pharmacy Students and Interns  
144 College Street  
Toronto, Ontario M5S 3M2

Dear Ms. Patrick,

I am following up on your November 8<sup>th</sup> letter outlining the collective concerns of the pharmacy graduates about the decision to cancel the Toronto sitting and reduce capacity in Ottawa. Thank you for the opportunity to respond as it enables PEBC to clarify some misconceptions by providing the facts that informed important decisions.

Given the current state of the pandemic, the risk that all exam centres would cancel or reduce capacity was real and quite high across the country. To ensure that the OSCE could be held safely, PEBC consulted on an ongoing basis with its exam centre partners, the Public Health Agency of Canada and continuously reviewed national and provincial public health guidelines to develop then modify protocols that would support the health and safety of all participants in the OSCE. It is with this tremendous amount of planning and round the clock effort that PEBC was able to administer the exam to approximately 1,000 candidates on November 8<sup>th</sup>. PEBC shares in candidates' disappointment and frustration that it was not able to administer the exam to all candidates at all the sites so that each one of them could continue to proceed on their path to full registration as pharmacists.

With respect to the timing of the most recent notifications, it is truly unfortunate that some candidates in Ontario received notice about the cancellation of their exam only two days before the exam. But there were reasons for this. In the week prior to the exam, when the provincial government announced its new framework and discussions with Toronto Public Health raised concerns, PEBC focussed its efforts on working with its pharmacy partners to try to resolve the issues through outreach to government officials and agencies to seek clarity as to the requirements of the applicable regulation - or an exemption so that we could proceed with the exam. PEBC firmly believes that it was right to delay the final decision until as late as possible to allow all efforts to be exhausted to prevent the undesirable outcome of a cancellation and in the best interest of candidates who wished to proceed. It was this approach that allowed PEBC to administer the OSCE exam across the country, instead of prematurely cancelling additional examinations. Regrettably, based on Toronto Public Health's interpretation, and in the absence of clarification or intervention from the provincial government, PEBC could not proceed with the OSCE in Toronto and was required to reduce its capacity in Ottawa.

Your letter expressed concerns about the lack of communication of a contingency plan, however, PEBC disagrees with this characterization as PEBC provided candidates with a number of updates throughout the past few months, both in direct email communication to candidates as well as accessible to all via its website. It had also directly communicated with CAPSI representatives as well as with the class representatives of the 2020 graduating classes across the country. In doing so, PEBC requested all questions be brought forward and PEBC provided detailed responses to the inquiries and concerns received. Included in those communications were responses to the suggestions noted in your correspondence and we will elaborate further here. Specifically, your letter noted the following suggestions:

- Virtual OSCEs / remote MCQs
- Adding additional sites
- Providing full provisional licensing

PEBC has responded about the request to move the exams to a virtual environment. For Part I (MCQ), the PEBC Board quickly moved to approve remote proctoring and PEBC was able to successfully administer the exam in early August to all candidates at test centres and remotely. As for the Part II (OSCE), PEBC noted the challenges with a virtual OSCE in terms of ensuring the security of a virtual OSCE and confirming that this delivery format would be fair, valid, and reliable. Further information has been posted on PEBC's website this week about virtual OSCEs.

A key element in our contingency planning centred on increasing capacity in the OSCE. In working with its partners, PEBC was able to increase its capacity significantly in the November exam compared to previous years to accommodate the higher numbers of candidates displaced due to COVID impacts in May. Usually PEBC tests fewer than 800 candidates in November and had there been no reductions or cancellations, PEBC would have tested 50% more candidates than prior OSCEs in November. It is a testament to the hard work and dedicated efforts by the exam centre teams who worked closely with PEBC staff to overcome each obstacle that - amidst rapidly escalating COVID challenges - PEBC tested 200 more candidates than previous November exam administrations. Many candidates have acknowledged and appreciated the extraordinary dedication that was put forward to enable their exams to occur. An additional contingency measure for November included PEBC's foresight to work closely with its partners during the summer to tentatively secure a date in February as a back-up in the event that there were cancellations in November. Furthermore, we communicated the possibility of the February timing on its website in early October.

In terms of your final suggestion for provisional licensure, PEBC is not involved in the determination of registration requirements. This falls under the purview of the provincial regulatory authorities, which in Ontario is the Ontario College of Pharmacists. This was also previously communicated to the graduates earlier in the spring.

While PEBC actively engaged with CAPSI and other student representatives early in the spring / summer, it acknowledges that there can never be too much communication. We are committed to continuing ongoing information updates and would welcome CAPSI's participation in collaborative advocacy efforts with government officials to help garner clarification and / or intervention from the provincial government to benefit candidates.

PEBC recognizes the tremendous impact on candidates not being able to take the Qualifying Examination and is actively working to offer an additional administration in February to allow candidates to progress with the registration process. PEBC will arrange a meeting with CAPSI representatives as well as those from the programs that are most affected to discuss the path forward.

Sincerely,

A handwritten signature in black ink that reads "John A. Pugsley". The signature is written in a cursive, flowing style.

John A. Pugsley, B.Sc. Phm, ACPR, Pharm.D.  
Registrar – Treasurer