



**Ontario College
of Pharmacists**

Putting patients first since 1871

**MINUTES OF A
BOARD OF DIRECTORS MEETING
DECEMBER 3, 2025**

1:00 P.M. TO 2:30 P.M.

WEDNESDAY, DECEMBER 3, 2025 – 1:00 P.M.
HELD VIA VIDEOCONFERENCE

OCP Board of Directors

Jennifer Antunes
Simon Boulis
Douglas Brown (Chair)
Akil Dhirani
Lisa Dolovich
Scott Ford
Adrienne Katz
Jamie Killingsworth
Danny Paquette
Ranjithkumar Paranivasagam
Siva Sivapalan (Vice Chair)
Cindy Wagg
Devinder Walia
Victor Wong

Regrets

Simran Bal
Leyland Brown
Andrea Edginton
Jae-Yon Jung
Elnora Magboo
Francis Michaud
Stephen Molnar
Alain Stintzi
Wilfred Steer

Management

Jay O'Neill, Registrar and CEO
Susan James, Director, Registration and Quality
Thomas Custers, Director, Corporate Services
Angela Bates, Director, Conduct
Christian Guerette, General Counsel and Chief Privacy Officer

Staff

Allena Nguyen, Executive Assistant, Temporary Assignment
Sharlene Rankin, Executive Assistant, Directors & Corporate Policy

The Chair called the meeting to order at 1:05 p.m.

1. Land Acknowledgement

The meeting began with a land acknowledgment led by Danny Paquette in recognition and respect for Indigenous peoples.

Following the Land Acknowledgement, the Chair welcomed new public director Ranjithkumar Paranivasagam to the Board of Directors.

2. Approval of Agenda

MOTION: THAT the Board of Directors approves the agenda for the December 3, 2025, meeting as presented.

Moved by Siva Sivapalan
Seconded by Devinder Walia

CARRIED.

3. Declaration of Conflict of Interest

The Chair asked the Board if anyone had any conflicts to declare. Siva Sivapalan noted his role as an examiner with the PEBC, but this was not confirmed to be a conflict.

4. Minutes of Board Meeting – For Decision

MOTION:

THAT the Board of Directors approve the minutes of the November 20, 2025, meeting as presented.

Moved by Devinder Walia
Seconded by Victor Wong

CARRIED.

5. Amending Regulation under the *Drug and Pharmacies Regulation Act, 1990* – For Decision

Susan James, Director, Registration and Quality attended to present a direction from the Ministry of Health (Ministry) to OCP to make regulatory amendments to support recent legislative changes for the expansion of “As of Right” rules which will apply to certain out-of-province health care professionals, effective January 1, 2026.

Ms. James noted that at a special Board meeting on November 20th, the Board approved for circulation a proposed regulation to amend General Regulation 264/16 under the Drug and Pharmacies Regulation Act, 1990 (DPRA) to define who is a “person prescribed by the regulations.”

As well, the Board passed a motion to request that the proposed amendments be exempt from the mandatory 60-day consultation, due to short timelines. The Chair submitted a letter to the Minister with this request and the Minister provided the requested exemption. Ms. James noted that as a result, the OCP has not proceeded to do any circulation, and nothing suggests a need to revise the regulation, which therefore remains unchanged at present.

The Board’s approval is being sought to proceed with submission of the regulation to the Ministry, while ensuring consistency with changes to the DPRA to include the other health professions that

interface with the pharmacy system and are to be included in the “As of Right” rules (chiropractors, midwives, dental hygienists, optometrists).

At the last meeting, the Board posed questions, including about applicants who have not yet completed the jurisprudence exam, how these individuals will bill the Ontario Drug Benefit (ODB) program for pharmacy services they deliver, and whether applicants can serve in the role of a designated manager or supervise other pharmacy personnel in community pharmacy.

Ms. James noted that answers to some of these questions are not fully clear yet, but nothing currently precludes applicants from acting as designated managers under “As of Right” rules. Risk is mitigated by processing their registration applications as quickly as possible during the 6-month “As of Right” eligibility period.

If an applicant is properly registered in another province, they are eligible to practise in Ontario under the Labour Mobility Act or “As of Right”. When an applicant relies on “As of Right” to move to Ontario, they are required to start the OCP registration process prior to commencing practice in Ontario and also file an attestation that they meet eligibility requirements for “As of Right. They must also maintain their registration in the other province during the 6-month eligibility period. Regarding any concerns about differing standards across provinces, Ms. James noted that standards are relatively consistent. Applicants need to practise in accordance with the Ontario standards and have the competence to practise within authorized scope in Ontario.

If registration with OCP is denied, Registration will immediately flag the issue, and the applicant can no longer practise under “As of Right” in Ontario. If an applicant fails to pass the jurisprudence exam, they may continue to practise under “As of Right” while rescheduling the exam.

Regarding prescribing for minor ailments under “As of Right” rules – a Board member noted that this scope varies from province to province and asked about whether there is a central source of information. It was noted that the OCP (and other PRAs) has a public register with key registrant information, and that during the OCP registration process, background checks are completed.

A Board member noted that aside from the concerns that have been raised, “As of Right” is government policy, and asked whether government will work with OCP to address these concerns. Ms. James indicated that it is important for OCP to monitor implementation. “As of Right” is not new to Ontario, as there are already four other professions under existing “As of Right” regulations, whose experience is that it has not been used. OCP has had 130 registrants under the Labour Mobility Act, and these numbers are now reducing. The general intent of government is to move practitioners into Ontario without restrictions.

A question was raised about whether the OCP register will note how a pharmacy professional came to practise in Ontario. It was noted that applicants entering under “As of Right” will not be noted on the public register. Staff are currently examining this issue.

After some discussion of possible alternative motions, the Board asked for the original motion to be tabled, followed by a motion newly tabled by a Board member.

MOTION:

That the Board of Directors approves for submission to the Ministry the proposed regulation, made under the authority of section 161(1) (v) of the *Drug and Pharmacies Regulation Act, 1990*, to amend General Regulation 264/16, by including the definitions of prescribed persons as set out in Appendix 3.

Moved by Siva Sivapalan
Seconded by Jennifer Antunes
CARRIED.

MOTION:

That the Board direct staff to:

1. Conduct an analysis of regulatory and policy options to ensure that individuals practising under As of Right are not registered in Ontario unless all registration requirements, including PEBC examination success, where applicable, are fully met, and to assess how risk is managed during the six-month As-of-Right period;
2. Provide options to enhance public-protection measures, including improved visibility of As-of-Right practitioners for employers and the public, strengthened designated manager safeguards, and approaches to maintain Ontario's competency standards amid evolving interprovincial mobility frameworks; and
3. Document these concerns and include them in the College's communication to the Ministry regarding implementation of the As-of-Right framework, and report back to the Board with findings and recommendations at a future meeting.

Moved by Siva Sivapalan
Seconded by Jennifer Antunes
CARRIED.

7. Adjournment

There being no further business, at 2:24 p.m. the meeting was adjourned.

Angela Bates
Director, Conduct

Doug Brown
Board Chair