



## Consultation: Model Documents for PRA Use – Non-sterile and Sterile Compounding Standards

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**Executive Summary:** The National Association of Pharmacy Regulatory Authorities (NAPRA) consulted on key components to support a national approach to compounding competence. The consultation focused on: guidance for education accreditors, a national framework for assessor qualifications, and implementation timelines for training and competency assessment.

### CSHP Response:

- The Canadian Society of Healthcare-Systems Pharmacy (CSHP) supports the goal of strengthening patient safety and standardizing compounding competence nationally, while emphasizing that implementation must be feasible, accessible, and aligned with the realities of Canada's healthcare system.
- **Workforce Readiness:** Retaining sterile compounding as an entry-to-practice competency for pharmacy technicians is critical. Removal would shift training burden to employers and reduce baseline workforce preparedness.
- **Feasibility & Capacity:** Limited availability of qualified assessors, educators, and facilities. Significant constraints expected in rural, remote, and smaller jurisdictions. Risk of delays in workforce readiness and impact on patient care.
- **Accessibility of Training:** Mandatory in-person requirements may create barriers. Hybrid training models (virtual + hands-on) are recommended to improve access
- **National Standardization:** Need for consistent, standardized competency assessments across Canada. Clear definitions of assessment criteria and equivalency required to support mobility.
- **Assessor Requirements:** Proposed criteria may significantly limit the assessor pool. Risk of increased administrative burden and potential conflicts of interest. Practical guidance and mitigation strategies are needed.
- **Economic Impact:** Lack of clarity on who will fund training and assessment programs. Potential cost pressures on healthcare systems, employers, and learners. Sustainability concerns if funding models are not defined.
- **Alignment with Existing Standards:** Regulatory changes must align with the Canadian Council for Accreditation of Pharmacy Programs (CCAPP) and the Canadian Pharmacy Technician Educators Association (CPTTEA). Misalignment may lead to inconsistent graduate preparedness.
- **Implementation & Transition:** Need for clear timelines, phased implementation, and transition planning. Recognition of prior learning and contingency planning for limited capacity.