

SAC Submission to the Ministry of Health

Speech-Language & Audiology Canada (SAC) appreciates the opportunity to provide feedback on the proposed amendments to O. Reg. 256/24 under the *Pharmacy Act, 1991*. SAC supports initiatives to improve access to care while ensuring patient safety and clear referral pathways. Our comments focus on the proposed inclusion of **otitis externa** as an ailment that pharmacists may assess for the purposes of prescribing.

1. Clinical Assessment and Professional Expertise

Symptoms commonly associated with otitis externa, such as ear pain, itchiness, and temporary hearing changes, may also appear in other ear conditions that require different management. Accurate assessment depends on the ability to perform a focused physical exam, usually with the use of an otoscope, with adequate visualization of the ear canal and eardrum.

Audiologists are trained to conduct comprehensive examinations of the ear including, but not limited to, comprehensive otoscopic examinations helping to identify and distinguish between external and middle ear inflammation, and to identify red flags requiring urgent referral to a physician. Without similar training for pharmacists, there is a risk that symptoms may be misinterpreted, leading to delayed referral or inappropriate treatment.

Audiologists have shared that patients are sometimes initially treated for presumed otitis externa, only to later discover a different underlying condition after a full ear examination and diagnostic testing. Such delays can prolong symptoms and affect recovery.

These concerns highlight the importance of ensuring that pharmacists' assessments for otitis externa are supported by appropriate training, sufficient visualization of the ear canal, and clear pathways for timely referral when needed.

2. Pharmacy Environment

Expanding access should be accompanied by safeguards to ensure safe and effective care. Many retail pharmacy spaces are not designed for clinical assessments that require privacy. Specific concerns include:

- Lack of private or soundproof rooms
- High-traffic environments that may discourage sensitive disclosure or thorough examinations
- Limited space for conducting physical assessments and examinations
- Workflow demands that may restrict the time needed for safe evaluation

Conclusion

SAC supports initiatives that improve patient access to care. However, because symptoms of otitis externa overlap with other ear conditions that may require different management, any expansion of pharmacists' prescribing authority should be accompanied by appropriate training and safeguards to ensure effective assessment, referral, and continuity of care.