



california pharmacists association

April 1, 2020

Kimberly Kirchmeyer
Director
California Department of Consumer Affairs
1625 N. Market St
Sacramento, CA 95834

Dear Ms. Kirchmeyer,

As you are intimately aware, we are in the midst of a public health crisis as a result of COVID-19, which is placing an additional strain on our healthcare system. As with all contagions, healthcare providers caring for ill patients sometimes contract the illness as well. This has been the case with this virus, further exacerbating the situation. While we are all hopeful that there will be swift resolution to this public health crisis, the United States Department of Health and Human Services is currently estimating that this virus will take 18 months to run its course and there will likely be multiple waves of infection.

Primary healthcare providers on the "front lines" need the assistance of providers in **all** disciplines during this critical time. It is with that in mind that the California Pharmacists Association (CPhA), and its several thousand members, stand ready to help reduce the spread and manage the health burden of COVID-19.

CPhA fully supports the Governor's efforts to create the California Health Corps and the accompanying Executive Order regarding, in part, the ability for DCA to temporarily waive licensing requirements for certain professionals who are currently inactive, retired, or are students in various health fields. To that end, CPhA would like to request this waiver be extended to student pharmacists in California.

All student pharmacists are currently licensed by the California Board of Pharmacy as intern pharmacists. Under Business and Professions Code Section 4114, "(a) An intern pharmacist may perform all functions of a pharmacist at the discretion of and under the direct supervision and control of a pharmacist whose license is in good standing with the board." Student pharmacists are currently trained and qualified to provide routine immunizations and CLIA-waived point of care testing (POCT). As screening tools, such as POCT, and immunizations for COVID-19 are approved, student pharmacists would prove to be a ready workforce of healthcare providers to support the state's initiative to contain this epidemic.

Intern pharmacists are required to complete 1,500 hours of pharmacy practice experience as an eligibility requirement for the pharmacist licensure examination. These hours consist of direct patient interaction, which under the newly announced California Health Corps would provide the necessary practice based training necessary to ensure an active pharmacy workforce.

Under normal circumstances, approximately 1,300 student pharmacists in their final year would be completing these training hours at their rotation sites in various pharmacy and health system settings. Given the COVID-19 pandemic, most of those rotation opportunities

have been halted or cancelled. The ability for student intern pharmacists to get their full licensure is now impeded by this. In accordance with the Health Corps anticipation of about 37,000 healthcare workers that will be needed, waiving the licensure requirements for student intern pharmacists would be ideal for combatting COVID-19. Additionally, these students would be able to fill pharmacy staff shortages that are currently being reported.

We thank you for your attention to this matter.

Sincerely,



Ken Thai, Pharm D
President
California Pharmacists Association



Susan A. Bonilla
Chief Executive Officer
California Pharmacists Association