



## 2022 Policy Manual

*As of the 2022 House of Delegates*

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\*House of Delegate Standing Rule IV - Review of Policies (*in part*)

All non-archived policies shall be reviewed at least every five (5) years.

Policies determined as valid and of such significance as to preclude the need for regular review on a five (5) year basis shall be retained and archived without further action by the House of Delegates.

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## Advertising and Media

*Policies pertaining to marketing to the public and healthcare professionals*

### Truth in Advertising

The California Pharmacists Association supports a requirement that all dietary supplements contain the following disclaimer or similar statement on the label and in any advertising: "This product has not been evaluated by the Food and Drug Administration and is not proven to diagnose, mitigate, treat, cure, or prevent any disease. Please consult your physician or pharmacist prior to taking this product because it may have serious adverse side effects and/or interactions with medications you may be taking."

The California Pharmacists Association supports the requirement that all advertising for health-related products and services, identify all actors as such.

The California Pharmacists Association supports references to pharmacists and the pharmacy profession to promote the sale of a product only with the admonition that patients seek the professional advice of their pharmacist prior to the use of the product.

### Direct-To-Consumer Advertising

The California Pharmacists Association opposes false or misleading advertising and/or health claims for prescription or nonprescription medications, dietary supplements and medical devices, or any promotional efforts that encourage indiscriminate use of the above.

The California Pharmacists Association supports legislative and regulatory activities limiting direct-to-consumer advertising concerning medical or health conditions treatable by prescription or nonprescription medications. These advertisements must furnish accurate, complete, comprehensive, and understandable information that informs consumers of potential benefits and risks of the product.

The California Pharmacists Association supports the FDA or other regulatory agencies taking action against those making false or misleading health claims.

### Patient Assistance Programs and Information

The California Pharmacists Association encourages pharmaceutical manufacturers to provide pharmacists with all promotional and informational materials for any patient-oriented programs, including but not limited to copay assistance programs or patient assistance programs, in which pharmacists may be asked to participate or support.

The California Pharmacists Association encourages pharmaceutical manufacturers to maintain the highest level of confidentiality in the process of maintaining, distributing and utilizing any patient data generated by copay assistance or patient assistance programs.



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## **Drug Abuse, Control, and Education**

*Policies pertaining to drugs of abuse; drug misuse, abuse, addiction; and recovery from addiction*

### **Substance Abuse Recovery Programs**

The California Pharmacists Association supports the rehabilitation and recovery of pharmacy personnel with substance use disorders to ensure that the individual's health and public safety are not placed in jeopardy.

The California Pharmacists Association supports recovery/treatment programs to rehabilitate the individual as an alternative to administrative disciplinary action.

### **Notification of Potential or Actual Abuse of Medications**

The California Pharmacists Association encourages drug regulatory enforcement agencies and pharmacists to exchange information with CPhA regarding the potential or actual abuse of drugs and other substances.

## **Drug Classification**

*Policies pertaining to the classification of medications*

### **Third Class of Drugs**

The California Pharmacists Association supports the creation of category drugs, which could be furnished only by a pharmacist or by prescription. This category of drugs would be subject to the same standards for advertising affecting legend drugs.

### **Controlled Substances Act Schedule Conformity**

The California Pharmacists Association supports restructuring of the Controlled Substances Act schedules to improve conformity between federal and state classifications for control and procedural purposes.

### **Medicinal Use of Cannabis**

The California Pharmacists Association supports the legalization of cannabis for medicinal use and that pharmacies be the distribution channel.

### **Reclassification of Cannabis and Psilocybin**

The California Pharmacists Association supports the reclassification of cannabis and psilocybin within the state and federal Controlled Substance Acts to allow for medicinal use.

### **Pseudoephedrine**

The California Pharmacists Association supports efforts to require a prescription from a pharmacist or other licensed prescriber for the dispensing of Pseudoephedrine (PSE) products.



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## **Cannabidiol (CBD)**

The California Pharmacists Association supports the development of health care provider education related to the clinical efficacy, safety, and management of patients using derivatives from either marijuana or hemp plants and their various components.

The California Pharmacists Association supports pharmacist participation in furnishing derivatives from either marijuana or hemp plants and their various components when scientific data support the legitimate medical use of the products and delivery mechanisms, and federal, state, or territory laws or regulations permit pharmacists to furnish them.

The California Pharmacists Association supports regulatory changes that further facilitate patient access to products containing cannabidiol (CBD) or derivatives collected from hemp that meet government standards for purity and potency.

## **Drug Pricing, Packaging, and Distribution**

*Policies pertaining to the pricing, packaging, and/or distribution of medication*

### **Restricted Drug Distribution Systems**

The California Pharmacists Association opposes the procurement and distribution of any drug in the U.S. through any drug distribution system which restricts or otherwise limits pharmacist care.

### **Drug Shortages**

The California Pharmacists Association supports legislative and regulatory changes that would prevent or resolve drug and vaccine shortages.

### **Manufacturer Pricing and Marketing**

The California Pharmacists Association supports the development of drug product pricing and marketing policies that reduce the burden of research and development costs on the American public.

The California Pharmacists Association supports the implementation of pricing systems from pharmaceutical manufacturers that result in fair and reasonable drug costs to all persons authorized to dispense pharmaceutical products.

The California Pharmacists Association supports price arrangements that offer preferential pricing for legally recognized eligible healthcare organizations.

The California Pharmacists Association supports legal and legislative measures aimed at eliminating discriminatory pricing to purchasers of pharmaceutical products.



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## **Standardized Manufacturer Labeling**

The California Pharmacists Association supports the standardization of drug product labeling by manufacturers such that the lot number, National Drug Code (NDC) number, Universal Product Code (UPC) or NDC barcode, and expiration date are clearly visible; the expiration date and lot number should not be cut or embossed into the surface of the label.

The California Pharmacists Association supports the requirement that manufacturers adopt global standardization of barcodes. This should include at minimum the product NDC, serial number, manufacturer origin, lot number, and expiration date on all prescription drugs, biologics, nonprescription drugs, and over-the-counter (OTC) drugs. Software developers should incorporate such standardization to capture this information for medical records, compounding, and drug inventory.

The California Pharmacists Association encourages the manufacturer to include product image and imprint information on the container.

The California Pharmacists Association supports manufacturers and distributors of over-the-counter (OTC) and prescription products including on the label the company and location (City, State, or Country) where the product is manufactured and packaged.

The California Pharmacists Association supports the standardization of labeling of dietary supplements with specific pharmacologic effects to ensure safe and proper use by consumers.

The California Pharmacists Association supports good drug manufacturing procedures or equivalent practices to ensure quality, purity and potency of drug products and dietary supplements.

The California Pharmacists Association supports efforts by United States Pharmacopeia (USP) to explore the advisability and feasibility of developing and promoting standardized imprint coding for all solid oral dosage forms.

## **Sales Tax on Medications, Medical Supplies and Equipment**

The California Pharmacists Association opposes the imposition of any sales tax on medications, medical supplies, and durable medical equipment dispensed pursuant to a prescription.

## **Drug Importation**

The California Pharmacists Association supports federal laws allowing the importation of United States Food and Drug Administration (FDA) approved medications by licensed entities following demonstration of safety and reliability of imported medications.

The California Pharmacists Association opposes the importation of FDA approved medications by patients and/or their agents.

The California Pharmacists Association supports federal policy that allows patients, under the care of a physician, to import moderate amounts of non-FDA approved drugs into the United States for their own personal use in the treatment of their medical conditions.



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The California Pharmacists Association supports the authority and responsibility of the FDA to exclude from importation those drug products that present unnecessary risk to the patient or might otherwise lead to fraudulent use.

## **Return and Reuse of Medications**

The California Pharmacists Association supports the return and reuse of properly stored and tamper-proof packaged medications due to a change in the patient's treatment plan or in the event of a patient's discharge or death. The criteria for return and reuse should be:

1. Medications are restricted to those in licensed healthcare facilities which maintain control and storage of a patient's medications;
2. Third party payment programs have implemented credit policies and procedures which are cost effective for both the program and their participating pharmacy providers; and,
3. Adequate and appropriate payments are made to pharmacies for the cost of rescuing such medications and returning them to their inventories for future use.

## **Product Returns**

The California Pharmacists Association encourages all manufacturers to accept for credit full and partial package returns of expired, discontinued or reformulated products, as well as those whose product or package appearance has been changed.

## **Delivery and Transportation of Medications**

The California Pharmacists Association supports pharmacists and pharmacy directors in the development of policies and procedures reflecting the use of pharmacists' professional judgement in the transportation and distribution of medications.

The California Pharmacists Association supports the use of the pharmacists' professional judgement in determining the method of delivery and destination of a patient's medication.

## **Medication and Medical Equipment/ Supply Chain**

The California Pharmacists Association supports a reliable domestic supply and production of medications, ingredients, and medical equipment by manufacturers as a matter of national security and public welfare.

The California Pharmacists Association supports pricing and reimbursement systems that ensure affordability of and access to domestic supply and production of pharmaceutical and medical products.



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## **Education, Curriculum, and Competencies**

*Policies pertaining to pharmacists, student pharmacists, pharmacy technicians and/or other pharmacy personnel education*

### **Continuing Education**

The California Pharmacists Association supports uniform standards for the accreditation and acceptance of pharmacy continuing education credits.

The California Pharmacists Association supports pharmacists completing accredited continuing education that maintains their professional competencies, including coursework accepted by other health profession licensing boards.

### **Post Graduate Training**

The California Pharmacists Association supports the expansion of fellowships and accredited residency programs in pharmacy practice.

### **Intern Pharmacist Program Review**

The California Pharmacists Association supports a periodic review of intern pharmacist competency requirements.

### **Non-traditional Doctor of Pharmacy Degree Programs**

The California Pharmacists Association supports the development of a university-sponsored post-graduate degree program offering pharmacists the opportunity to attain a Pharm.D. degree.

The California Pharmacists Association supports requirements that non-traditional Doctor of Pharmacy degree programs have competency outcomes for graduates equivalent to those in traditional programs.

### **Pharmacy School Needs Assessment**

The California Pharmacists Association supports professional assessment of current and future pharmacist demands and the need for additional schools of pharmacy or expansion of current programs.

### **LGBTQ+ Resources**

The California Pharmacists Association supports ongoing education, training, and resources that promote pharmacy personnel competence in LGBTQ+ patient care.

The California Pharmacists Association supports policies, systems, and practices that foster equity and inclusion of LGBTQ+ patients, visitors, and pharmacy personnel.





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## **Emerging Therapies**

*Policies pertaining to new and emerging therapies and the pharmacists' role in them*

### **Pharmacogenomics**

The California Pharmacists Association supports education and application of pharmacogenomics in healthcare.

### **Cellular and Emerging Therapies**

The California Pharmacists Association supports the role of the pharmacist, in all settings, in the selection, preparation, and use of cellular based therapeutic agents and other emerging therapies to ensure safety, appropriateness, and quality of these preparations.

### **Digital Health Integration**

The California Pharmacists Association supports education about digital health devices and technologies in pharmacy school curricula and for the pharmacy workforce.

The California Pharmacists Association supports inclusion of pharmacists in the development of digital health devices and technologies.

The California Pharmacists Association supports that digital health devices and technologies be interoperable with and integrated into pharmacy management systems and electronic health records.

The California Pharmacists Association supports involvement of pharmacists in utilization of digital health devices and technologies to optimize patient outcomes.

## **Ethics**

*Policies pertaining to ethical concerns in the pharmacy profession, including conflicts of interest*

### **Gifts to Pharmacists**

The California Pharmacists Association supports the following guidelines for gifts from the pharmaceutical industry: Any gifts accepted by pharmacists should serve an educational function or be directly related to the pharmacist's professional services. Cash payments should not be accepted.



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## **Licensure, Registration, and Regulation**

*Policies pertaining to the laws and regulation pertaining to pharmacists, pharmacies, patient/public, and the practice of pharmacy*

### **City and County Ordinances**

The California Pharmacists Association opposes local, city or county ordinances that regulate the practice of pharmacy.

The California Pharmacists Association encourages local authorities, cities or counties to work through the Board of Pharmacy or state legislature regarding issues concerning the practice of pharmacy.

### **Complementary and Alternative Medicine**

The California Pharmacists Association supports extending the authority of the FDA to include complementary and alternative medicine that purports to affect the health, structure or function of a human being.

### **Board of Pharmacy Composition**

The California Pharmacists Association supports a requirement that officers of the Board of Pharmacy be elected by a majority of the statutory membership of the board.

The California Pharmacists Association supports a requirement that at least 3/4 of the Board of Pharmacy professional appointees be pharmacists who are actively engaged in the practice of pharmacy and represent a diversity of practice types.

### **Exempt Professionals - Residencies**

The California Pharmacists Association supports regulations that permit individuals participating in residency training programs to be classified as exempt professional employees.

### **Prescriber Dispensing**

The California Pharmacists Association supports amendment and enforcement of federal and California laws and regulations governing the packaging, labeling, and dispensing of prescription drugs to require all prescriber dispensing to conform to the same standards applicable to pharmacists and to prohibit prescriber abuse of the permissible childproof safety container exemption.

The California Pharmacists Association supports expansion of Board of Pharmacy jurisdiction to include oversight of non-pharmacist dispensing.



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## **Non-Pharmacist Prescriber Dispensing**

The California Pharmacists Association opposes non-pharmacist dispensing of medications except under the direction and supervision of a California licensed pharmacist.

The California Pharmacists Association supports dispensing by legally authorized personnel in compliance with policies and procedures developed by a consultant pharmacist only in those instances where adequate pharmacist services are not available.

## **Tobacco & Cannabis Sales and Government Programs**

The California Pharmacists Association supports exclusion of pharmacies that sell tobacco and/or recreational cannabis products from participation in government-sponsored programs.

## **Patient Abandonment**

The California Pharmacists Association supports the development of regulations that subjects drug wholesalers to the same patient abandonment rules that apply to other healthcare providers. Proposed regulations should limit the ability of drug wholesalers to deny delivery of pharmaceuticals (including controlled substances) without a prior review by the Board of Pharmacy for regulatory violation.

## **Pharmacist Licensing Examination**

The California Pharmacists Association supports the evaluation of pharmacist licensure examinations by private and public stakeholders to ensure appropriate content, quality, and applicability.

## **Patient Access**

*Policies pertaining to the availability of services and patient choice*

### **Any Willing Provider**

The California Pharmacists Association supports the right of every patient, regardless of physical location, to utilize without restriction any willing and qualified pharmacist or pharmacy of their choice for pharmaceutical products, services and medical devices offered through an insurance program, managed care system or other third party arrangement that contracts for pharmacy services.

The California Pharmacists Association supports the establishment of patient access and availability standards.



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## **Pharmacist Care**

*Policies pertaining to the practice of pharmacy*

### **Patient-Centered Medical Home**

The California Pharmacists Association supports a patient-centered medical home model which includes pharmacist providers and pharmacy services.

The California Pharmacists Association supports adequate and timely payments for these patient-centered medical home services.

The California Pharmacists Association supports incentives that reward providers and beneficiaries for achieving desired outcomes within the patient-centered medical home.

### **Collaborative Practice Agreements**

The California Pharmacists Association supports collaborative practice agreements between pharmacists and other healthcare providers or entities.

### **OTC Compounding**

The California Pharmacists Association supports compounding of over-the-counter products for an individual patient without a prescription as a function of the pharmacists' scope of practice.

### **Medication Management**

The California Pharmacists Association supports medication management programs furnished by a pharmacist that are designed to assure that medications are appropriately used to optimize outcomes.

### **Pharmacist Prescriptive Authority**

The California Pharmacists Association supports the pharmacists' ability to prescribe.

The California Pharmacists Association supports the right of pharmacists to dispense medications which they have prescribed.

### **Compounding**

The California Pharmacists Association supports the continuation and integrity of the professional practice known as pharmaceutical compounding.

The California Pharmacists Association supports the authority of the state boards of pharmacy to have exclusive jurisdiction over the practice of pharmacy, including pharmaceutical compounding.

The California Pharmacists Association supports the premise that all compounded medications prepared by pharmacists upon orders by prescribers for specific patients are to be considered legal prescriptions.



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## Pharmacy Practice

*Policies pertaining to the operations and day-to-day practice of pharmacy*

### Prescription Drug Monitoring Programs (PDMP)

The California Pharmacists Association supports a standardized portal to report controlled substance utilization and that licensed pharmacies should be responsible for transmitting controlled substance utilization data to no more than one single entity on a regular, recurring basis.

The California Pharmacists Association supports all pharmacists having access to the real time Drug Utilization Review (DUR) via a prescription drug monitoring program (e.g. Controlled Substance Utilization Review and Evaluation System [CURES]).

The California Pharmacists Associations supports utilization of Prescription Drug Monitoring Program (PDMP) by prescribers and dispensers to initiate and analyze Patient Activity Reports (PAR) prior to prescribing, dispensing, and as often as deemed necessary.

### Prescription Blank Security Features

The California Pharmacists Association supports standardization of the controlled substance prescription security forms and improving the security feature requirements on those forms and encourages the development of real-time electronic verification methods.

### Prescription Information and Medication Labels

The California Pharmacists Association supports requiring that the intended use of a prescribed medication and/or diagnostic and therapeutic codes, and all relevant patient information (e.g. allergies) be included on all prescriptions, and that the intended use of the medication be included on the medication label.

The California Pharmacists Association, recognizing a patient's right to privacy, supports allowing patients to opt out of having the indication printed on the medication label upon request.

The California Pharmacists Association supports the requirement that prescriptions include relevant prescriber contact information for prompt verification.

### Electronic Nicotine Delivery Systems

The California Pharmacists Association supports regulations equivalent to that of tobacco products for e- cigarettes and related products.

The California Pharmacists Association opposes the sale of e-cigarettes and other electronic nicotine delivery systems in pharmacies, and facilities that contain a pharmacy.

The California Pharmacists Association opposes the use of e-cigarettes and other electronic nicotine delivery systems in areas subject to current clean air regulations for combustible tobacco products.

### Medication Synchronization

The California Pharmacists Association supports medication synchronization with pharmacist oversight.



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## Dispensing Medical Devices and Equipment

The California Pharmacists Association supports pharmacists furnishing and dispensing of medical devices and equipment that can be used by patients.

## Professionalism

*Policies pertaining to the conduct of pharmacists and pharmacy personnel*

## Consolidation of Pharmacy Organizations

The California Pharmacists Association supports the consolidation of pharmacy organizations in California.

## Recruitment of Underrepresented Minorities

The California Pharmacists Association supports a long-term program for the recruitment of minorities who are underrepresented in the pharmacy profession.

The California Pharmacists Association encourages the development and regular updating of comprehensive recruitment materials directed toward minorities that address such issues as pharmacy career opportunities and which depict professional minority role models.

The California Pharmacists Association encourages development of a network of pharmacists who would serve as role models for minority students and assist in recruitment of underrepresented minorities into the pharmacy profession.

The California Pharmacists Association encourages schools of pharmacy to actively participate in the recruitment of underrepresented minorities.

## Training in Medically-Underserved Areas

The California Pharmacists Association supports incentive programs that encourage advanced practice pharmacy experiences and post-graduate training programs in medically-underserved areas.

## Capital Punishment

The California Pharmacists Association opposes laws and regulations that mandate or prohibit pharmacists from professional participation in capital punishment.

The California Pharmacists Association discourages pharmacist professional participation in capital punishment on the basis that such activities are fundamentally contrary to the role of pharmacists as providers of healthcare.

## End of Life Options

The California Pharmacists Association opposes laws and regulations which mandate or prohibit the participation of pharmacists in end of life options for mentally competent, terminally ill patients. The California Pharmacists Association supports laws and regulations granting express immunity from civil, criminal, and administrative liability for pharmacists who participate in lawful end of life



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options. The California Pharmacists Association supports changes in regulations so that patients have access to all dosage forms in their chosen end of life medications administration.

## Professional Conduct

The California Pharmacists Association supports the pursuit of individual integrity, ethics, and professional conduct in academic and professional activities.

The California Pharmacists Association supports uniform standards for the criteria of academic integrity, ethics, and professional conduct that uphold the dignity and honor of the profession.

The California Pharmacists Association supports ongoing education on academic integrity, ethics, and professional standards in pharmacy curricula and post-graduate continuing education and training.

The California Pharmacists Association supports systems that facilitate the reporting and monitoring of violations of academic integrity, ethics, and professional standards.

The California Pharmacists Association supports the individual's obligation to report violations of integrity, ethics, and professional conduct, whether these violations are of one's own or their colleagues.

## Pharmacist's Application of Professional Judgment

The California Pharmacists Association supports pharmacists, as licensed health care professionals, in their use of professional judgement throughout the course of their practice to act in the best interest of their patients.

The California Pharmacists Association asserts that a pharmacist's independent medication review and use of professional and clinical judgement in the medication selection and distribution process is essential to patient safety.

The California Pharmacists Association opposes state and federal laws that limit a pharmacist's responsibility to exercise professional judgement in the best interest of patients.

The California Pharmacists Association calls for civil, criminal, and professional liability protections for pharmacists and pharmacies if the pharmacist's responsibility to use professional judgment is limited by state or federal laws.

## Public Health

*Policies pertaining to the well-being of patients and the community*

## Reproductive Health Services

The California Pharmacists Association supports reproductive justice, defined as the human right to maintain personal bodily autonomy, have children, not have children, and parent children in safe and sustainable communities.



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The California Pharmacists Association encourages all healthcare professionals, healthcare facilities, and pharmacies to facilitate timely access to reproductive health products and services, including contraception, emergency contraception, and abortion, to the fullest extent possible.

The California Pharmacists Association encourages pharmacists and pharmacies to provide patient-centered reproductive health services by utilizing furnishing authorities, ensuring inventory, educating patients and the public, and providing referrals while ensuring privacy and confidentiality.

The California Pharmacists Association supports the widespread availability of reproductive health services and products at no cost to patients.

The California Pharmacists Association supports policies ensuring those involved in the use or provision of reproductive health services or products to be free of restrictions and punishment.

## **Medication and Medical Supply Waste Disposal**

The California Pharmacists Association supports the development of safe and secure systems for the collection and disposal of returned medications or medical supplies, compensation to participating pharmacies for costs associated with the collection and disposal of such items, and educational efforts stressing the need for secure systems for the safe disposal of such items.

The California Pharmacists Association supports a single, statewide policy and opposes individual entities (e.g. municipalities, cities, counties, local governments, etc.) enacting local regulatory authority for the disposal of waste medications and medical supplies.

The California Pharmacists Association supports voluntary participation in take-back programs.

The California Pharmacists Association supports shared financial responsibility for the funding of drug take-back programs.

## **Health Screening by Pharmacists**

The California Pharmacists Association supports pharmacists providing mental and physical health screening and diagnostic testing.

## **Tobacco, Cannabis, and Alcoholic Beverages**

The California Pharmacists Association supports public education about the health consequences of tobacco, cannabis, and alcohol use.

The California Pharmacists Association encourages pharmacists to refer patients to treatment programs.

The California Pharmacists Association opposes the sale of tobacco products, recreational cannabis-containing products, and alcoholic beverages in all California pharmacies and all facilities that contain a pharmacy.

## **Health Disparities**

The California Pharmacists Association supports elimination of health disparities.





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The California Pharmacists Association supports collaboration between pharmacists, patient groups, local organizations, and other health care providers to identify and address health disparities.

## Immunization of Pharmacy Personnel

The California Pharmacists Association supports efforts to increase immunization rates of healthcare professionals for the purposes of protecting patients.

The California Pharmacists Association urges all pharmacy personnel to receive all immunizations recommended by the Centers for Disease Control (CDC) for healthcare workers.

The California Pharmacists Association encourages employers to require immunizations recommended for healthcare workers by the CDC and to provide these as a paid benefit.

## Reimbursement, Compensation, and Coverage

*Policies pertaining to third party policies and healthcare administration*

### Universal Healthcare

The California Pharmacists Association supports a universal healthcare system.

The California Pharmacists Association supports a healthcare delivery and financing system which incorporates the following:

1. Healthcare coverage for all is required whether multi-payer or single-payer including but not limited to an individual mandate
2. Allows for the purchase of additional coverage outside the basic plan
3. Permits patients to choose the healthcare provider of their choice, including pharmacists
4. An independent review board, which includes providers, to make benefit/coverage decisions
5. A mechanism to advance the continued improvement of healthcare
6. The option for providers to balance bill their usual and customary rates
7. Mechanisms to address fraud in a timely and appropriate manner
8. A pharmacy benefit package that includes payment for medications and compensation for pharmacist services
9. A uniform system for billing and prior authorization procedures.

### Administrative Costs and Compensation

The California Pharmacists Association supports third party programs that do not have the requirement that pharmacies absorb administrative costs related to the claims payment activities. Examples would include, but not be limited to: costs of claim forms, costs of mandated claims input devices, and electronic transmission costs associated with data gathering without any resulting payment.

The California Pharmacists Association supports payment to providers, including pharmacists, who prepare prior authorization requests or drug utilization reviews.



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The California Pharmacists Association supports the payment to pharmacists for all reasonable fees related to providing prescription records.

The California Pharmacists Association supports payment to pharmacists who accept assignment of benefits from enrollees of third party programs for all components of pharmacist care provided to the patient.

## **Medi-Cal Reimbursement**

The California Pharmacists Association supports Medi-Cal drug payment according to the pharmacy's usual and customary charge to private pay patients.

## **Technology In Pharmacy**

*Policies pertaining to technology in pharmacy practice*

### **Electronic Prescriptions**

The California Pharmacists Association supports the requirement that prescription orders be clear and legible regardless of format.

The California Pharmacists Association supports use of electronic methods for the transmittal of prescriptions and other patient care information provided that adequate safeguards are in place to prevent and detect inappropriate or unauthorized transmittals.

The California Pharmacists Association supports the adoption and implementation of standards for the electronic transmission of new prescriptions, refill authorization requests and approvals, and patient profiles between pharmacies; or, between a prescriber and the pharmacy of the patient's choice.

The California Pharmacists Association supports adoption of methodologies to protect patient confidentiality, consumer freedom of choice, and appropriate ownership of information to minimize the possibility that pharmacists and their patients may be adversely affected by electronic transmission of information.

The California Pharmacists Association opposes any requirements that pharmacies assume the financial burden associated with electronic data exchange.

### **Communication Technology**

The California Pharmacists Association encourages pharmacists to use communication technologies as a means of educating themselves, patients, and other healthcare professionals.

The California Pharmacists Association supports the provision of pharmacist care utilizing technology when there is a professional pharmacist-patient relationship.



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## **Automated Dispensing Systems**

The California Pharmacists Association supports the use of automated drug delivery systems, remote dispensing systems and/or evolving dispensing technologies to assist the pharmacist in the provision of pharmacist care.

## **Electronic Health/Medical Records**

The California Pharmacists Association supports the use of uniform standards and interoperable Electronic Medical Records (EMRs) and/or Electronic Health Records (EHRs) to enhance patient care.

The California Pharmacists Association supports allowing pharmacists to include and maintain records of over-the-counter products, professional services, diagnoses, and therapeutic outcomes in EMRs/EHRs as part of individual patient profiles.

The California Pharmacists Association supports EMRs/EHRs allowing healthcare providers access to all information necessary to provide optimal patient care, while ensuring sufficient safeguards for Protected Health Information.

## **Telehealth**

The California Pharmacists Association supports telehealth as an option for providing pharmacist patient care services.

The California Pharmacists Association supports payment systems for telehealth services provided by pharmacists.



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## **Workforce and Workplace**

*Policies pertaining to employees, employers or the environment they work in*

### **Workplace Drug Testing**

The California Pharmacists Association opposes mandatory drug testing in the workplace except in those instances in which there is reasonable cause for such testing based on identifiable facts relating to the individual's job performance.

The California Pharmacists Association supports the use of Employee Assistance Programs for assessment and referral to appropriate treatment and rehabilitation services.

### **Intern Pharmacists**

The California Pharmacists Association supports reasonable intern pharmacist ratios as determined by the supervising pharmacist.

The California Pharmacists Association supports pharmacists and pharmacies providing as many intern opportunities as possible, both paid and volunteer, at their place of practice so that intern pharmacists are afforded quality training experiences.

The California Pharmacists Association supports interprofessional education (IPE) and care.

The California Pharmacists Association supports supervision of intern pharmacists engaged in the practice of pharmacy within the IPE curriculum of a school or college of pharmacy by any licensed healthcare professional provided there is overlap in scope of practice between the intern pharmacist and supervising professional for the care provided.

The California Pharmacists Association supports the accreditation standards that regulate the training of intern pharmacists.

### **Pharmacy Technicians**

The California Pharmacists Association supports the following:

1. The pharmacist shall retain those functions involving professional judgement, and accept full responsibility for the direct supervision and activities of technical or clerical functions, which are performed by pharmacy technicians.
2. Minimal qualifications for registration as a pharmacy technician shall include: graduation from an accredited pharmacy technician training program that meets Board of Pharmacy standards, or certification by a certifying body approved by the Board of Pharmacy. All candidates for registration as a pharmacy technician must show verifiable pharmacy practice experience and competency.
3. All pharmacy technicians, regardless of practice setting, must be registered/licensed with the Board of Pharmacy.



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4. Pharmacist and technician staffing which supports work flow without compromising patient safety.
5. Technicians checking the work of other technicians only in instances where technicians with Board of Pharmacy recognized certification are checking other technicians in an inpatient hospital setting, with clinical pharmacy services, and when the work being checked is limited to the filling of a unit dose drug distribution system. Legal responsibility and liability for any "Tech-Check-Tech" program shall include the holder of the pharmacy permit, and the "Pharmacist-in-Charge" and technicians involved. Any "Tech-Check-Tech" program shall include specific written guidelines and continuous quality improvement (CQI) programs. Further, all "Tech- Check-Tech" programs shall establish and maintain a verifiable system which assures the ongoing monitoring and documentation of technician performance.
6. Requiring pharmacy technicians registered with the board to obtain 20 hours of accredited CE per registration cycle.
7. Ongoing training of pharmacy technicians by whatever means are appropriate to develop the necessary skills via programs developed and administered under the guidance of pharmacists.
8. Background checks and drug screenings of technicians-in-training shall be the responsibility of the technician training school, when applicable.
9. Creating a temporary license status classification of "trainee" for technicians to allow on-the-job training of persons seeking registration as pharmacy technicians who have met the educational requirements, who are awaiting review and approval of application. This temporary license status should be valid for a maximum of a six-month period.
10. The distinction between Pharmacy Technician and Advanced Pharmacy Technician be based on demonstrated knowledge, skills and abilities, and not site of practice.

## Advanced Pharmacy Technicians

The California Pharmacists Association supports the role of an Advanced Pharmacy Technician to enhance the ability of the pharmacist to provide patient-centered care.

The California Pharmacists Association supports additional requirements for the recognition of an Advanced Pharmacy Technician, such as:

- A minimum of three years of work experience as a Pharmacy Technician with the equivalent of at least 1 year of experience in the relevant area of practice in an advanced role
- Receive certification as a Pharmacy Technician through an organization recognized by BOP
- Completion of an approved Advanced Technician certificate training program or equivalent CE
- Obtain additional hours of accredited CE, per registration cycle, relevant to the area of practice, in order to maintain recognition as an Advanced Pharmacy Technician



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## **Pharmacy Security**

The California Pharmacists Association supports stakeholders taking measures to create an environment that prioritizes the safety and security of patients and pharmacy personnel through the development and implementation of strategies, technologies, and relevant training programs to deter pharmacy robberies.

The California Pharmacists Association supports the creation and use of an information sharing system reporting pharmacy related crime.

## **Background Checks**

The California Pharmacists Association supports background checks of pharmacy personnel to ensure safety of the public and prevent drug diversion.

## **Drug-Related Crime**

The California Pharmacists Association supports that individuals convicted of drug-related crimes, without evidence of rehabilitation or mitigating factors, may be denied access to prescription drugs as pharmacy personnel.

## **Pharmacist in Charge (PIC) Responsibilities**

The California Pharmacists Association supports the requirement for a Pharmacist in Charge (PIC) for each pharmacy.

The California Pharmacists Association opposes the imposition of strict liability on the Pharmacist in Charge (PIC) for illegal or negligent acts of others within the organization who disregard the systems in place.

## **Personal Protective Equipment (PPE)**

The California Pharmacists Association supports readily accessible personal protective equipment (PPE) and other necessary equipment for pharmacy personnel provided by the workplace to protect the workforce and patients.

The California Pharmacists Association supports the creation of necessary equipment reserves that are sufficient to provide pharmacy personnel through times of disaster provided by the workplace.

The California Pharmacists Association supports the collaboration between employers of pharmacy personnel and in-state licensed distribution centers/wholesalers and government agencies to maintain and store sufficient equipment reserves.

## **Compensation**

The California Pharmacists Association supports employers providing pharmacists and pharmacy personnel compensation commensurate with their professional education, postgraduate training and experience, credentials and services they provide.



# Archived Policies

## Advertising & Media

*Policies pertaining to marketing to the public and healthcare professionals*

### Professional Image

The California Pharmacists Association supports use of words that promote the professional image of pharmacy.

### Incentive Coupons

The California Pharmacists Association opposes the use of financial incentives such as coupons or gift cards associated with the transfer of a prescription record.

## Disaster Preparedness

*Policies pertaining to preparing for and responding to disasters.*

### Emergency Response

The California Pharmacists Association supports an interprofessional emergency response to disasters.

The California Pharmacists Association encourages pharmacy personnel to complete first responder and disaster training.

The California Pharmacists Association encourages pharmacy personnel to register and participate as a volunteer for emergencies and times of disaster.

## Drug Classification

*Policies pertaining to the classification of medications*

### Sustained-Release Medication Nomenclature

The California Pharmacists Association supports a standardization of nomenclature for sustained-released medications.

### Drug Product Naming

The California Pharmacists Association, to preserve patient safety, opposes the practice of pharmaceutical manufacturers identifying drug products with names and/or trademarks highly similar to existing drug products containing different therapeutic ingredients.



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## **Drug Pricing, Packaging, and Distribution**

*Policies pertaining to the pricing, packaging, and/or distribution of medication*

### **Pharmaceutical Manufacturer Product Information**

The California Pharmacists Association supports that pharmaceutical manufacturers provide pharmacists with adequate information regarding their products to enable pharmacists to appropriately counsel their patients so as to assure drug therapy of optimal effectiveness, safety, and duration. This also should include adequate notice of the availability of all new legend drugs, behind-the-counter medications, new OTC products or legend to OTC product conversions.

### **Medication Sampling**

The California Pharmacists Association supports pharmacist involvement in any medication-sampling programs.

### **Medication Disposal**

The California Pharmacists Association encourages pharmacy wholesalers to establish a method and a reasonable and regular schedule for pick-up and disposal of outdated unreturnable medications from pharmacies.

### **Medication Resale**

The California Pharmacists Association opposes resale of drugs by hospitals and other institutions outside the guidelines of the U.S. Supreme Court decision in *Abbott Laboratories v. Portland Retail Druggists Association* which provides for a private cause of action.

The California Pharmacists Association supports enforcement of the guidelines by the Board of Pharmacy.

### **Product Recalls**

The California Pharmacists Association supports a policy that pharmaceutical and medical device manufacturers notify pharmacists of the recall of any of their products. To the extent possible, notice should precede or be concurrent with notice to the public. Such notice should include the reason for the product recall and a statement of the potential hazards associated with the continued use of the recalled product to enable the practitioners to appropriately advise their patients. All costs incurred due to product recalls should be paid for by the manufacturer.





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## **Education, Curriculum, and Competencies for Pharmacists**

*Policies pertaining to pharmacists, student pharmacists, pharmacy technician and/or other pharmacy personnel education*

### **Financial Aid Programs**

The California Pharmacists Association supports financial aid programs for healthcare students.

### **Cultural Humility & Diversity**

The California Pharmacists Association supports ongoing cultural humility, diversity, equity, and inclusion education.

### **Competency Assessment**

The California Pharmacists Association supports the use of individual self-assessment processes, the development and use of competency-based assessment tools and the utilization of results to guide the pharmacist in continuing professional development.

### **Advanced Training**

The California Pharmacists Association encourages pharmacists to seek advanced training.

### **Pharmacist Care – Educational Programs**

The California Pharmacists Association supports the development and dissemination of educational programs to pharmacists to implement and expand pharmacist care.

The California Pharmacists Association supports the education of patients, payers, policy makers, other healthcare providers, and the public regarding the value of pharmacist care.

### **Complementary and Alternative Therapies**

The California Pharmacists Association supports the education of pharmacists and student pharmacists regarding complementary and alternative therapies.

### **Continuing Education Quality Monitoring**

The California Pharmacists Association supports monitoring quality and content of all Continuing Education programs to ensure a balanced, non-biased presentation.

### **Patient Lifestyle Education Programs**

The California Pharmacists Association supports programs that educate and inspire pharmacists to help patients change their lifestyle in ways to improve health.

### **Domestic Violence and Pharmacist Training**

The California Pharmacists Association supports the education and training of pharmacy staff to recognize patients who may be victims of domestic violence and refer them to appropriate local programs.



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## **Basic Life Support Certification**

The California Pharmacists Association supports basic life support (BLS) certification for all pharmacists.

The California Pharmacists Association encourages pharmacists to maintain certification and to seek additional training in first aid and advanced life support.

## **Environmental Concerns**

*Policies pertaining to the sustainability and reduced environmental impact*

### **Environmental Stewardship**

The California Pharmacists Association supports environmentally friendly principles and practices in the practice of pharmacy.

### **Non-Recyclable Waste**

The California Pharmacists Association supports measures by manufacturers and re-packagers of pharmaceutical and other products commonly furnished through pharmacies to reduce non-recyclable waste.

## **Government Programs and Policies**

*Policies pertaining to government programs and policies*

### **Managed Healthcare Oversight**

The California Pharmacists Association supports changes in state law that will enhance the oversight authority of the Department of Managed Healthcare to include protection of consumer and provider interests.

### **Board of Pharmacy Disciplinary Action Cost Recovery**

The California Pharmacists Association supports legislative or regulatory change that would allow or extend "cost recovery" in administrative actions to both parties involved in disciplinary actions.

## **Licensure, Registration, and Regulation**

*Policies pertaining to the laws and regulations pertaining to pharmacists, pharmacies, patient/public, and the practice of pharmacy*

### **Licensee Due Process**

The California Pharmacists Association encourages the Board of Pharmacy to provide a licensee with both notice and an opportunity to appeal any allegation(s) of misconduct with the Board prior to the development of a formal accusation or referral to the Attorney General.



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## **Pharmacist Licensing Examination**

The California Pharmacists Association supports assessment of pharmacist licensure applicants' skills including, but not limited to, a proficiency in oral and written communication, the provision of pharmacist care, application of clinical knowledge to typical pharmacy practice situations, and an understanding of the application of state and federal pharmacy laws.

## **Standards of Practice**

The California Pharmacists Association supports the establishment of standards of practice that are adopted by the profession to assure the health and safety of the public.

## **Registration of Facilities**

The California Pharmacists Association supports state and federal laws and regulations that require all facilities involved in the storage for distribution, wholesale distribution, or dispensing of legend drugs to patients in California be registered with state boards of pharmacy, provided that such registration does not restrict pharmacists from providing professional services independent of a facility.

## **Pharmacies Not Recognized by the Board of Pharmacy**

The California Pharmacists Association opposes any entity operating a pharmacy with services available to the general public within the borders of California, that is outside of the jurisdiction of the Board of Pharmacy.

## **Disciplinary Statute of Limitations**

The California Pharmacists Association supports legislative or regulatory change that imposes on the Board of Pharmacy a reasonable statute of limitations for filing disciplinary actions against licensees.

## **Whistle Blower Protection**

The California Pharmacists Association supports adoption of a "whistle blower" provision by the Board of Pharmacy to protect the licensee from discipline by the Board when the licensee provides the initial report of the violation that serves as the basis for the discipline.

## **Pharmacy Ownership**

The California Pharmacists Association is opposed to manufacturers of pharmaceutical products owning pharmacies due to the potential for patient interest to be subverted and for free competition to be harmed.

## **Prescription Records - Subpoena Duces Tecum**

The California Pharmacists Association supports the inclusion of pharmacists and pharmacies within the protections given by Code of Civil Procedure Section 1985.3 for personal records which are the subject of subpoenas duces tecum.

## **Board of Pharmacy Cite and Fine Authority**

The California Pharmacists Association supports the development of criteria by the Board of Pharmacy, in consultation with California pharmacist organizations, for the cite and fine process.



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## **Counterfeit Drugs**

The California Pharmacists Association fully supports the enforcement of federal and state laws that prohibit counterfeiting, adulterating and mislabeling drugs, improper use of samples, and the marketing of imported drugs not approved by the FDA.

## **Pharmacist Licensure Classification**

The California Pharmacists Association supports one licensure classification for pharmacists.

## **Pharmacy Licensing Categories**

The California Pharmacists Association opposes the establishment of any additional categories of pharmacy licenses.

The California Pharmacists Association supports the establishment of regulatory requirements for specialized areas of practice in accordance with standards adopted by the profession that assure the protection of the health and safety of the public.

## **Unapproved Drugs**

The California Pharmacists Association supports the Food and Drug Administration's policy that requires an approved New Drug Application before a drug can be marketed.

## **Regulatory Notice**

The California Pharmacists Association encourages the Board of Pharmacy and other state and federal agencies whose regulatory activities or jurisdictions cover the business or professional activities of pharmacies and/or pharmacists to provide at least 90-days advance information and notice to each regarding the implementation of new or modified statutes or regulations by such agencies that will affect the profession of pharmacy.

## **Publication of Pharmacist's Information**

The California Pharmacists Association opposes the release of any licensed or registered individual's personal addresses and telephone numbers by the Board of Pharmacy to the general public.

## **Mission of the Board of Pharmacy**

The California Pharmacists Association supports the continued existence of the Board of Pharmacy as a consumer protection agency.

The California Pharmacists Association believes the Board of Pharmacy should ensure pharmacists' competency and protect the public while allowing those pharmacists that the Board regulates to rehabilitate their licenses when violations occur.

The California Pharmacists Association believes the Board of Pharmacy should emphasize education and compliance to prevent violations and promote corrective actions prior to utilization of the administrative law process.



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## **Prescriber Scope of Practice**

The California Pharmacists Association supports limiting prescribing authority to the prescriber's recognized scope of practice.

## **Pharmacy Profession Self-Regulation**

The California Pharmacists Association supports a philosophy that it is the function of the profession to formulate, implement and self-regulate pharmacist responsibilities and that government intervention into this area should be confined to an absolute minimum.

## **Pharmacy Inspections**

The California Pharmacists Association supports a pharmacy inspection program by the Board of Pharmacy as needed to protect the public health and safety.

## **Electronic System Process for California Board of Pharmacy**

The California Pharmacists Association supports the implementation of an electronic licensure application process for licensees by the Board of Pharmacy in order to facilitate timely licensure.

The California Pharmacists Association supports the provision of sufficient resources for the Board of Pharmacy to provide timely processing of applications for all licensees in order to better serve the public.

## **Patient Access**

*Policies pertaining to the availability of services and patient choice*

## **Unit of Use Packaging**

The California Pharmacists Association supports manufacturers' provision of medications in multiple package sizes to reflect unit of use packaging. Such unit of use packaging should accommodate standard pharmacy labels.

## **Mail Order Programs**

The California Pharmacists Association opposes the use of misleading or intimidating marketing practices, financial incentives or mandates by prescription plans to utilize mail order medication programs.

## **Hospital Pharmacy Coverage**

The California Pharmacists Association supports statutes and regulations requiring all hospitals, regardless of size, to provide 24-hour pharmacy coverage as a condition of licensure. "Coverage" shall mean the appointment of one or more pharmacists to the hospital staff who will be on site or on call to provide pharmacy services.



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## **Workforce Incentives for Underserved Areas**

The California Pharmacists Association supports government funded financial incentive programs that would encourage California licensed pharmacists to practice pharmacy in medically underserved areas of California.

## **Pharmacist Care**

*Policies pertaining to the practice of pharmacy*

## **Home Healthcare Pharmacy Services**

The California Pharmacists Association supports consultant pharmacist-home health agency relationships, including viable reimbursement mechanisms, as a means of improving the quality of pharmaceutical care delivered to home healthcare patients.

## **Pain Assessment**

The California Pharmacists Association supports the inclusion of pain assessment and management as essential components of patient care.

## **Dispensing for Off-Label Indications**

The California Pharmacists Association supports the right of pharmacists to compound and/or dispense prescription medications and devices for off-label indications.

## **Pharmacist Scope of Practice**

The California Pharmacists Association supports a pharmacist scope of practice that includes direct patient care services.

## **Testing Kits and Devices**

The California Pharmacists Association supports pharmacists taking an active role in the education and training of patients, and/or their caregivers, who use diagnostic or medical testing kits and devices, and other medical apparatus.

The California Pharmacists Association supports the sale and distribution of diagnostic or medical testing kits and devices, and other medical apparatus through healthcare professionals or centers that provide patient training and counseling on the appropriate use and interpretation of the product, test, apparatus, or device.

## **Dosage Form Selection**

The California Pharmacists Association supports pharmacists' authority to change dosage forms, choose pharmaceutical alternatives (drugs listing the same chemical moiety but differing in salt form) and choose drug delivery systems consistent with the desired therapeutic objectives.

## **Therapeutic Changes**

The California Pharmacists Association supports evidence-based programs that allow pharmacists to



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make therapeutic changes for the purpose of improving patients' clinical and/or economic outcomes, as well as overall health-related quality of life.

The California Pharmacists Association opposes policies and/or procedures that compel providers to alter patients' medication therapy, when such alteration is not in the best interest of the patient.

## **Pharmacy Practice**

*Policies pertaining to the operations and day-to-day practice of pharmacy*

### **Patient Confidentiality**

The California Pharmacists Association supports systems that protect patient confidentiality while allowing for information exchange between healthcare professionals involved in the patient's care.

### **Prescription Label Readability**

The California Pharmacists Association supports the use of prescription labels, which are attached to the medication container, that take into consideration a patient's individual needs, including but not limited to, visual impairment and language preference.

### **Nuclear Pharmacy**

The California Pharmacists Association supports that the responsibility for the preparation and distribution of radiopharmaceuticals for human and veterinary use shall be delegated only to qualified pharmacists.

### **Drug Utilization Review (DUR)**

The California Pharmacists Association supports interdisciplinary drug utilization review procedures.

### **Container Reuse**

The California Pharmacists Association supports the reuse of prescription containers for refills at the request of the patient when in the professional judgment of the pharmacist the container is suitable to reuse, so long as all other laws relating to the dispensing of medications are followed.

### **Drug Product Selection**

The California Pharmacists Association supports the pharmacist's professional judgment in selecting the source of supply of drug products to be dispensed to the patient.

### **Signs in Pharmacies**

The California Pharmacists Association opposes mandatory posting of signs in pharmacies.

### **Veterinary Pharmacy Practice**

The California Pharmacists Association supports interprofessional collaboration between veterinarians and pharmacists.

The California Pharmacists Association encourages veterinary medication manufacturers and wholesalers to eliminate restrictions on the purchase of veterinary products by pharmacies.



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The California Pharmacists Association supports programs to increase pharmacists' knowledge of veterinary medications and pharmacology.

The California Pharmacists Association supports OTC availability of certain veterinary medications and the development of appropriate recommendations to minimize the incidence of professionally unsupervised human use of veterinary medications.

The California Pharmacists Association supports soliciting the cooperation of the California Veterinary Medical Association in educating veterinarians regarding the need for safety packaging and adequate labeling of medications dispensed for animal use.

## **Tablet Splitting**

The California Pharmacists Association supports tablet splitting practices only when it is safe and appropriate for the patient.

## **Prescriber Sample Prescriptions**

The California Pharmacists Association supports prescriber sample prescriptions with pharmacist involvement in the interest of patient health and safety.

## **Professionalism**

*Policies pertaining to the conduct of pharmacists and pharmacy personnel*

### **Declining to Dispense**

The California Pharmacists Association supports the right and duty of a pharmacist to decline to dispense medications where, in the pharmacist's professional judgment, the use of the medication would be harmful to the patient. The prescriber should be consulted when the pharmacist believes such action is necessary. Professional judgment should not be grounds for disciplinary action.

### **Health Information Access**

The California Pharmacists Association supports that identifiable pharmacy patient data should not be shared with any other parties for marketing purposes without patient consent, or in any manner which violates patient confidentiality.

### **Professional Judgment**

The California Pharmacists Association supports the pharmacist's professional judgment in notifying a patient's healthcare provider of health information and opposes notification mandates that interfere with this judgment.

### **Pharmacist-Patient Privilege**

The California Pharmacists Association supports legislation to create pharmacist-patient privilege to legally protect the confidential relationship between the pharmacist and patient.





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## **Third Party Payer Obstacles**

The California Pharmacists Association supports actions by a third party payer which will bring immediate relief to those patients having problems obtaining their medications due to obstacles raised by that third party payer.

## **Collaboration by Pharmacy Organizations**

The California Pharmacists Association supports collaboration among pharmacy organizations to provide a unified voice in pharmacy.

## **Pharmacist Public Service**

The California Pharmacists Association encourages pharmacists to serve in elected office, on voluntary health agency boards, and other advisory bodies.

## **Rights of Conscience**

The California Pharmacists Association supports the pharmacist's right to conscientious refusal based upon ethical, moral, or religious grounds so long as patients' timely and reasonable access to care is preserved.

## **Professional Rehabilitation**

The California Pharmacists Association supports programs and policies for the rehabilitation of pharmacy personnel who have conducted themselves unethically or who have violated pharmacy laws or regulations.

## **Public Health**

*Policies pertaining to the well-being of patients and the community*

### **Poison Control Centers**

The California Pharmacists Association supports regional poison control centers which involve pharmacists in their development and operation.

### **Medication Use in Schools**

The California Pharmacists Association supports pharmacists' working with school administrators, teachers, healthcare providers, and parents/guardians to improve the use of medication in schools.

The California Pharmacists Association recommends that pharmacists be involved in the development of guidelines for medication use in schools.

### **Public Health Education**

The California Pharmacists Association supports pharmacists becoming actively involved as service providers and public educators on major public health issues and diseases.



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The California Pharmacists Association encourages development of cooperative efforts among healthcare organizations and agencies to facilitate the collection, evaluation, and distribution of information on public health issues.

The California Pharmacists Association supports the development of educational programs for pharmacists which would enable them to assume a service role in addressing public health issues.

## **Immunization Services**

The California Pharmacists Association supports pharmacists providing comprehensive immunization services.

The California Pharmacists Association supports the education and training of pharmacy technicians to administer vaccines.

The California Pharmacists Association supports appropriately trained pharmacy technicians to administer vaccines under the direction and supervision of a pharmacist.

## **Vaccination of Children**

The California Pharmacists Association supports the vaccination of all children, unless medically contraindicated.

## **Vaccination Education**

The California Pharmacists Association encourages pharmacists to actively educate, promote, and counsel patients about the importance of vaccinations to enhance good health in the community.

## **Infection Control**

The California Pharmacists Association supports implementation of CDC guidelines for infection control and the ongoing training of pharmacy personnel in infection control policies and procedures.

The California Pharmacists Association supports the provision of confidential consultation and reasonable accommodation for pharmacy personnel infected by a blood-borne pathogen.

## **Needle and Syringe Exchange Programs**

The California Pharmacists Association supports needle and syringe exchange programs.

## **Quality Assurance**

*Policies pertaining to the monitoring and improvement of products, practices, and services, including error reduction programs*

## **Continuous Quality Improvement**

The California Pharmacists Association supports pharmacists' involvement in the development and operation of continuous quality improvement (CQI) programs designed to influence the behavior of patients, prescribers and pharmacists in such a way as to maximize the quality of healthcare through



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improved therapeutic outcomes as well as to assist in the control of healthcare costs. Such systems should include, where appropriate, elements of drug utilization review (DUR) and drug usage evaluation (DUE) as integral components.

## **Post-Marketing Surveillance Programs**

The California Pharmacists Association supports and encourages the active participation of pharmacists in post-marketing surveillance programs including, but not limited to, adverse reaction reporting and drug product problem reporting for drugs and other health products.

## **Criminal Prosecution of Medical Errors**

The California Pharmacists Association supports programs that are designed to prevent or eliminate medical errors.

The California Pharmacists Association supports the position that medical errors should not be subject to criminal prosecution, absent clear evidence of intent to harm.

## **Reduction of Medication Errors**

The California Pharmacists Association supports the implementation of methods to reduce medication errors.

The California Pharmacists Association supports non-punitive reporting of medication errors to facilitate error reporting and development of solutions to prevent errors.

## **Reimbursement, Compensation, and Coverage**

*Policies pertaining to third party policies and healthcare administration*

### **Medi-Cal DME/Medical Supplies**

The California Pharmacists Association supports the ability of all pharmacies to provide all covered DME/Medical supplies to Medi-Cal beneficiaries and receive compensation from the Medi-Cal program for those supplies.

### **Third Party Insurance Cards**

The California Pharmacists Association supports the uniformity of all third party insurance cards; third party payers providing adequate information on patient identification cards to facilitate efficient claims processing; and third party payers adopting a standardized system of identifying numbers for members and their dependents (i.e., 01, 02, 03, etc.).

### **Professional Dispensing Fee Review**

The California Pharmacists Association supports the determination of dispensing fees based on a bi-annual review of the actual cost to fill a prescription in California.



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## **Pharmacy Networks**

The California Pharmacists Association supports the opportunity for any willing and qualified provider to participate in pharmacy networks and the open negotiation of third party contracts.

## **Workers' Compensation Reimbursement**

The California Pharmacists Association supports a Workers' Compensation fee schedule for medications and medical supplies that recognizes the value of pharmacy services and the unique expenses associated with Workers' Compensation claims.

The California Pharmacists Association supports the enforcement of interest and penalties for pharmacy claims that are not paid in a timely manner as defined under law.

## **Drug Formularies**

The California Pharmacists Association supports pharmacist involvement in the development of formularies and formulary systems that are based on quality of care/quality of life considerations, evidence-based criteria, and cost effectiveness. A formulary system must include an efficient method of obtaining therapeutic entities not listed in the formulary.

## **Optional Co-Payment and Mandated Services**

The California Pharmacists Association supports elimination of co-payment requirements where the provision of pharmacy services is mandated regardless of whether or not the co-payment is made by the beneficiary.

## **Contract Reform**

The California Pharmacists Association supports requirements that all pharmacy related third party contracts come with a summary page outlining the major terms of the contract.

The California Pharmacists Association supports requirements that all third party pharmacy contract changes come with a cover page outlining the changes.

## **Third Party Contracting**

The California Pharmacists Association supports negotiation of compensation rates and other contract terms between third party programs and pharmacists/pharmacies and opposes unilateral determination of contract terms by third party programs.

The California Pharmacists Association supports state and federal legislation permitting pharmacists to negotiate collectively with third party program sponsors, administrators, and/or subcontractors.

## **Third Party Plan Limitations**

The California Pharmacists Association opposes third party plan length of therapy or dispensing limitations.

## **Pharmacist Professional Fees**

The California Pharmacists Association supports adequate payment for professional services.



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The California Pharmacists Association supports the right of individual pharmacists to determine fees for their professional services.

## **Pharmacist Provider Recognition**

The California Pharmacists Association supports recognition of the practice of pharmacy as a profession and pharmacists as healthcare providers by public and private payers with timely compensation for pharmacists' professional services.

## **Prior Authorization Standardization**

The California Pharmacists Association supports online access to and standardization of prior authorization processes.

The California Pharmacists Association supports the ability of pharmacists to initiate the prior authorization process.

## **Pharmacy Benefit Manager (PBM) Payments**

The California Pharmacists Association supports fair, transparent, current, and reasonable payments to all local pharmacies and pharmacists by Pharmacy Benefits Managers (PBMs) and other payers, such as health plans, trust funds, government, and self-funded employers.

The California Pharmacists Association supports the ability of pharmacy entities and pharmacists to assess and negotiate financially risk-acceptable contracts for Pay-for-Performance (P4P) programs that may result in positive or negative financial impact.

The California Pharmacists Association supports education for pharmacists, student pharmacists, and pharmacy personnel to develop sufficient understanding of payer organizations' policies and operations regarding contracts.

The California Pharmacists Association encourages pharmacists to become competent in understanding payer organizations' policies and operations regarding contracts so that they can make informed decisions when negotiating and interacting with payers and pharmacy services organizations.

## **Technology In Pharmacy**

*Policies pertaining to technology in pharmacy practice*

### **Electronic Claims Systems**

The California Pharmacists Association supports uniform standards for electronic claims systems for products and professional services.

### **Information Technology Testing and Verification**

The California Pharmacists Association supports thorough testing of any computer programs and verification of data used in medical care related systems and that satisfactory completion of the testing and verification be accomplished prior to implementation of any changed or new programs or data.



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## Unique Identifiers for Database Registrations

The California Pharmacists Association supports the use of an alternative unique identifier in place of social security number for identification to register for any electronic database.

## Workforce and Workplace

*Policies pertaining to employees, employers, or the environment they work in*

### Smoke Free Workplace

The California Pharmacists Association supports a smoke-free workplace.

### Polygraph Testing

The California Pharmacists Association opposes the use of polygraph testing in any pharmacy practice setting.

### Professional Corporations

The California Pharmacists Association supports pharmacists' ability to form and participate as members in professional corporations.

### Equitable Opportunity

The California Pharmacists Association supports equitable opportunity for professional advancement independent of age, disability, ethnicity, gender, gender expression, race, religion, or sexual orientation.

### Dependent Care Benefit

The California Pharmacists Association supports and encourages employer-assisted dependent care benefits.

### Family Leave

The California Pharmacists Association supports family leave as an employee benefit.

### Disabled Pharmacists and Staff

The California Pharmacists Association supports pharmacies providing reasonable accommodations to disabled and/or physically impaired pharmacists/interns/technicians and ancillary personnel. All pharmacy related personnel should be educated on how to provide reasonable accommodations for these individuals.

### Productivity Quotas

The California Pharmacists Association opposes any pharmacist productivity quotas.



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## Harassment

The California Pharmacists Association supports educational efforts which enhance the awareness and prevention of all forms of harassment.

The California Pharmacists Association opposes any form of harassment.

The California Pharmacists Association supports the right of pharmacy personnel and patients to be treated in a considerate, respectful and professional manner.

The California Pharmacists Association encourages employers to provide support to pharmacy personnel who face mistreatment in the workplace in the form of discrimination, harassment, as well as physical, verbal, or emotional abuse.

## Unlicensed Pharmacy Personnel

The California Pharmacists Association supports the use of any number of qualified individuals who may perform order entry, but may not perform repackaging tasks.

## Corporate Officer Liability

The California Pharmacists Association supports the application of liability to both pharmacist and non-pharmacist corporate officers for policies and procedures affecting pharmacy practice. The application of such liability should apply to any entity which affects the delivery of pharmacist care.

## Safety in the Workplace

The California Pharmacists Association supports the development of policies, resources, and practices to support pharmacy personnel's safety and wellbeing in the workplace.

The California Pharmacists Association supports business policies, practices, resources and staffing models that ensure patient safety



## **Standards of Practice**

### **Purposes and Application**

The California Pharmacists Association Standards of Practice shall guide a pharmacist in fulfilling the responsibilities of the profession. The term "shall" denotes services or functions that are essential to the provision of acceptable pharmacist care services and the term "should" denotes levels of practice which are felt to be desirable.

### **Facilities and Equipment**

A facility shall provide adequate space, equipment, and supplies for the healthcare services provided.

### **Communication**

Pharmacists shall communicate using an appropriate level of health literacy to ensure patient safety, taking into consideration a patient's individual needs, including language preference and visual, hearing, and physical impairment.

### **Policies and Procedures**

Pharmacists shall be involved in the development and annual review of policies and procedures that impact the practice of pharmacy.

### **Medication Review**

Pharmacists shall perform a medication review as required and as needed based upon the pharmacist's judgment to optimize patient care.

### **Emergency Drug Supplies**

Pharmacists shall maintain and furnish emergency drug supplies.

### **Sterile Compounding**

The compounding of sterile preparations shall be done in a fully qualified environment, by persons proficient in aseptic/sterile techniques, performed by or under the direct supervision of a pharmacist, and subject to the appropriate end product testing and related quality standards.





# california **pharmacists** association

## **Definitions of Supervision**

The California Pharmacists Association adopts the following definitions to be utilized in the interpretations of its policies.

“Direct supervision” means that the supervisor shall be present in the same facility as the person being supervised and available for consultation and/or assistance.

“Immediate supervision” means that the supervisor shall be physically present while a task is being performed.

## **Pharmacist Counseling**

Confidential consultation by a pharmacist shall be provided when warranted to meet the needs of a patient.

## **Coordination of Therapy**

Healthcare providers involved in the care of a patient should exchange pertinent patient health and medication record information.

## **Pharmacist Activities**

The activities of pharmacists and pharmacy personnel shall be commensurate with their level of training, skill, and experience.

## **Provision of Services**

Pharmacists shall provide pharmacist care services and referrals consistent with the health needs of their patients.

## **Pharmacy Services**

Pharmacy services should incorporate essential safe guards to public health and safety and, at a minimum, include the following:

1. Timely access to pharmacist consultation for all patients or their representatives.
2. Full compliance with ethical responsibilities and Federal and State laws and regulations.
3. Timely and accurate medication or device distribution.
4. Pharmacist care services.

## **Patient Information**

Pharmacists shall determine the necessary information to provide patient care.

## **Pharmacists on a Patient Care Team**

Pharmacists should be an integral member of any interdisciplinary patient care team.



# california **pharmacists** association

## **Direction and Control**

The provision of pharmacy services in any setting shall be under the direction and control of a pharmacist who is responsible for all aspects of the service.

## **Therapy Interventions**

Pharmacists shall make interventions regarding a patient's therapy to assure optimal outcomes.

## **Patient Health Information**

Pharmacists shall request their patients to report allergies, prior adverse drug reactions, medical conditions, lifestyle practices, and medications and supplements used to their healthcare providers.

## **Health Facility – Definition**

The term "health facility" shall include facilities where healthcare is provided.

## **Health Facility Committees**

Pharmacists shall actively participate in all appropriate committees of the health facility.

## **Health Facility Staff Education**

Pharmacists should provide education to health facility personnel.

## **Pharmacies - Hours of Operation**

Pharmacies providing services to the public shall prominently post their hours of availability.

## **Staffing**

The provision of pharmacist care in any setting shall be accomplished by a sufficient number of competent personnel for the services offered.

## **Standards for Products and Services**

All California recipients of pharmaceutical products, devices, and pharmacist care should receive the same quality of products and services. Every provider should meet the requirements, including licensure, of the California State Board of Pharmacy.

## **Pharmacist Role Models**

Pharmacists should promote pharmacy as a profession, educate future pharmacists, and serve as role models.



### **Product Expiration Dating**

Pharmacists shall use professional judgment to determine an appropriate expiration date or beyond use date.

### **Pharmacist Care Services**

The California Pharmacists Association defines pharmacist care as a service that optimizes therapeutic outcomes for patients and improves their quality of life. This service may or may not occur in conjunction with the provision of a medication or device. Collaborative efforts of an inter-disciplinary patient care team are important to the provision of meaningful pharmacist care.