

S.Gray/D.Robinson analysis

Recommendations. (with the Std of Care Cmte's edits)

The Board respectfully concludes that a **hybrid enforcement model** remains appropriate for the regulation of the practice of pharmacy for consumer protection. The Board recommends, based on the information received and considered, that California patients will benefit from pharmacists gaining additional independent authority to ~~perform~~ provide patient care services, as opposed not limited to the traditional dispensing tasks performed at licensed facilities, consistent with their respective education, training and experience. Further, the Board recommends revisions to certain provisions detailing a pharmacist's authorized scope of practice for specified clinical patient care services and repeal of some of the prescriptive conditions under which pharmacists are required to provide some patient care activities suggesting that a transition to a **standard of care model** for provisions of specified such patient care services is appropriate where sufficient safeguards are in place to ensure pharmacists ~~maintain~~ retain autonomy to make specified patient care decisions. Under those conditions, the Board believes that transitioning to greater use of a standard of care model in the provision of specified patient care services could benefit patients by providing expanded and timely access to patient care from suitably educated, trained and experienced health care providers that are readily accessible in communities.

Recommendations [after SoC edits (without DRobinson's edits)]

The Board respectfully concludes that a **hybrid enforcement model** remains appropriate for the regulation of the practice of pharmacy for consumer protection. The Board recommends, based on the information received and considered, that California patients will benefit from pharmacists gaining additional independent authority to provide patient care services, not limited to the traditional dispensing tasks performed at licensed facilities, consistent with their respective education, training and experience. Further, the Board recommends revisions to certain provisions detailing a pharmacist's authorized scope of practice for specified clinical patient care services and transition to a **standard of care model** for provisions of specified patient care services where sufficient safeguards are in place to ensure pharmacists retain autonomy to make specified patient care decisions. Under those conditions, the Board believes that transitioning to greater use of a standard of care model in the provision of specified patient care services could benefit patients by providing expanded and timely access to patient care from suitably educated, trained and experienced health care providers that are readily accessible in communities.

Recommendations. [after SoC's Suggested Revisions. (with DRobinson's edits shown)]

The Board respectfully concludes that a hybrid enforcement model remains appropriate for the regulation of the practice of pharmacy for consumer protection. The Board recommends, based on the information received and considered, that California patients will benefit from pharmacists gaining additional independent authority to provide patient care services, not limited to the traditional dispensing tasks performed at licensed facilities, consistent with their respective education, training, and experience. Further, the Board recommends revisions to certain provisions detailing a pharmacist's authorized

scope of practice for specified clinical patient care services and the transition to a standard of care model where sufficient safeguards are in place to ensure pharmacists retain autonomy to ~~make specified~~ utilize professional judgement in making patient care decisions. Under those conditions, the Board believes that transitioning to greater use of a standard of care model ~~could~~ would benefit patients by providing expanded and timely access to patient care from suitably educated, trained and experienced health care providers ~~that are readily accessible in communities~~.

Drobinson

Recommendations (with Dan Robinson's edits)

The Board respectfully concludes that a hybrid enforcement model remains appropriate for the regulation of the practice of pharmacy for consumer protection. The Board recommends, based on the information received and considered, that California patients will benefit from pharmacists gaining additional independent authority to provide patient care services, not limited to the traditional dispensing tasks performed at licensed facilities, consistent with their respective education, training, and experience. Further, the Board recommends revisions to certain provisions detailing a pharmacist's authorized scope of practice for specified clinical patient care services and the transition to a standard of care model where sufficient safeguards are in place to ensure pharmacists retain autonomy to utilize professional judgement in making patient care decisions. Under those conditions, the Board believes that transitioning to greater use of a standard of care model would benefit patients by providing expanded and timely access to patient care from suitably educated, trained and experienced health care providers.

[Note: I believe the the SoC's bolding of the phrases "hybrid enforcement model" and "standard of care model" may be intentional for emphasis purposes for the SoC committee meeting? But the SoC may not be suggesting such bolding be in the final version?]

****Recommendations** (with S Gray's to Dan Robinson's version shown)

The Board respectfully concludes that a hybrid enforcement model remains appropriate for the regulation of the ~~practice of pharmacy~~ professional practice of pharmacists for consumer protection. "Hybrid", in this context means that, some practices, such as sterile compounding and controlled substance security, may need to be specified in detailed statutes or regulations for the sake of patient or public safety, respectively. ~~The~~ However, the Board recommends, based on the information received and considered, that California patients and the public will benefit from pharmacists gaining additional independent authority to provide patient care services, not limited to the traditional dispensing tasks performed at licensed facilities, consistent with their respective education, training, and experience. Further, the Board recommends revisions to certain provisions detailing a pharmacist's authorized scope of practice for specified clinical patient care services and the transition to a standard of care model where sufficient safeguards are in place to ensure pharmacists retain autonomy to utilize professional judgement in making patient care decisions. Under those conditions, the Board believes that transitioning to greater use of a standard of care model would benefit patients by providing expanded and timely access to patient care from suitably educated, trained and experienced health care providers.