

Damoth, Debbie@DCA

From: Sandra Bardas <sandbar1343@gmail.com>
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To: Damoth, Debbie@DCA; kyoshizula
Subject: Public Comments for the board of Pharmacy Meeting February 7, 2024

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Member of the Board of Pharmacy,

In reading over the proposed regulations for a Pharmacist-in-Charge (P.I.C.) , I am asking the Board to clarify that a Consulting Pharmacist for the Clinic Pharmacy License is not equivalent to a P.I.C. I read the duties of the Consultant Pharmacy from the application as:

" Consulting Pharmacist Certification: I certify as the Consulting Pharmacist for this clinic, I will comply with the requirements as defined in Pharmacy Law. I further certify that the policies and procedures of the clinic's drug distribution service, relative to inventories, security procedures, training, protocol development, recordkeeping, packaging, labeling, dispensing, and patient consultation are consistent with the promotion and protection of the health and safety of the public."

Although there was mention of a Surgical Clinic Self-Assessment Form in the Meeting of August 25, 2022 meeting, such a template is not posted on the Board of Pharmacy website.

According to BPC sections 4182(a) & (b)/BPC 4192 (a)&(b) the consultant pharmacist is only required to be present in the facility for a minimum of once quarterly to file an inspection report which is to be kept on file for at least 3 years.

Respectfully Submitted,
Sandra Leigh Bardas RPH 32639