



California State Board of Pharmacy
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Business, Consumer Services and Housing Agency
Department of Consumer Affairs
Gavin Newsom, Governor



To: Board Members

Subject: Agenda Item V: Discussion and Possible Action Related to Proposed Addition of Section 1700 Related to Digital Signatures to California Code of Regulations, Title 16, Including Review of Comments Received During the 45-Day Comment Period

Background:

At the April 24, 2024, Board meeting, the Board approved the proposed regulation text to add Section 1700 related to Digital Signatures.

As required by the Administrative Procedure Act, Board staff released the proposed text for the 45-day comment period on December 20, 2024, which ended on February 3, 2025. The Board received one comment during the public comment period, stating support of the proposed regulation.

Attached to this memo are:

1. The proposed text that was released for the 45-day public comment period.
2. Comment received during the 45-day comment period.

At this Meeting:

The Board will have the opportunity to discuss the regulation and determine what course of action it wishes to pursue. Staff recommend that the Board adopt the regulation text as noticed on December 20, 2024.

Possible Adoption Language:

Adopt the regulation text as noticed on December 20, 2024. Authorize the executive officer to take all steps necessary to complete the rulemaking. Further, delegate to the executive officer the authority to make technical or non-substantive changes as may be required by the Control agencies to complete the rulemaking file.

**Department of Consumer Affairs
Title 16. Board of Pharmacy**

**Proposed Regulation Text
Digital Signatures**

Legend: Added Text is indicated with an underline.

Add section 1700 to Article 1 of Division 17 of Title 16 of the California Code of Regulations to read as follows:

§ 1700. Digital Signatures

Consistent with the authority established in Government Code Section 16.5, in any written communication, application or other document in which a signature is required or used, the Board shall accept digital signatures that meet the requirements set forth in the California Code of Regulations, Title 2, section 22003(a).

NOTE: Authority Cited: Section 16.5, Government Code. Reference: Section 16.5, Government Code.



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January 22, 2025
California State Board of Pharmacy
Attention: Anne Sodergren, Executive Director
2720 Gateway Oaks Drive, Suite 100
Sacramento, CA 95833

Via Email:

RE: § 1700 Digital Signatures.

Dear Executive Director Sodergren and members of the California Board of Pharmacy,

On behalf of all pharmacies owned and operated by Walgreen Co. licensed in the State of California, we thank the Board for the opportunity to comment on the proposed rules.

Walgreens strongly supports the Board's proposed regulation that permits the acceptance of digital signatures on written communications, applications, and other documents where a signature is required. This initiative will bring significant benefits to both pharmacists and the public, streamlining processes and enhancing efficiency across the Board's operations.

The acceptance of digital signatures in accordance with the California Code of Regulations, Title 2, Section 22003(a) represents a forward-thinking approach that aligns with modern technological advances and best practices in professional and administrative settings. This regulation will not only save valuable time for both applicants and Board staff but also reduce the administrative burden by facilitating smoother and quicker transactions. It will also contribute to more sustainable practices by reducing the need for paper documents, supporting California's ongoing environmental goals. By embracing digital signatures, the Board is also providing greater accessibility and convenience for all regulated entities and individuals, particularly those in remote or underserved areas. This will allow pharmacists and other permit holders to submit necessary paperwork and documentation without being hindered by geographic or logistical challenges.

I commend the Board for recognizing the need for a more efficient, modernized process and for supporting the use of technology in a way that continues to prioritize security and compliance. I am confident that this change will enhance the overall experience for everyone involved.

Thank you for your consideration of this important change, and for your ongoing commitment to improving the practices that serve the public and pharmacists in California.

Sincerely,

Lorri Walmsley, RPh, FAzPA