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OCT 29 2025

California State
Board of Pharmacy

California Board of Pharmacy
2720 Gateway Oaks Dr Suite 100
Sacramento, CA 95833

October 28, 2025

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Dear President Oh and Members of the Board:

We are writing to address the issues raised in the Enforcement and Compounding Committee Summary of Presentation on Duty to Consult and Discussion of California Regulations, Title 16, Section 1707.2.

In the Summary of Committee Comments, it notes that the Committee discussed whether "it may be appropriate to consider an exemption to the consultation requirements, in instances where a drug is filled by a pharmacy for administration by a healthcare provider in a medical office or clinic." Hartley Medical Center Pharmacy endorses the position.

Hartley has been shipping patient specific sterile compounded intrathecal medication directly to prescribers for over 25 years. Hartley has conformed to California law and included with each prescription a written insert for the patient which informs the patient that a pharmacist is available for no less than 40 hours, 6 days a week and the number to call. In all these years, we have had no calls from patients requesting a consultation.

A patient who is receiving medication directly in a medical office or clinic has the prescriber at the site to answer any questions. Hartley has no direct contact with our patients. Any pharmacy whose medication is shipped directly to prescribers is in the same situation.

We respectfully request that in reviewing CCR Title 16 Section 1707.2 the Board include language exempting pharmacies who ship directly to the prescriber for administration of the medication in a medical office or clinic from the duty to consult.

Sincerely,

Mirian Paik

Director of Pharmacy