



California State Board of Pharmacy

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Department of Consumer Affairs

Gavin Newsom, Governor



Communication and Public Education Committee Report

Nicole Thibeau, PharmD, Licensee Member, Chairperson

Jason Newell, Public Member, Vice Chairperson

Renee Barker, PharmD, Licensee Member

Claudia Mercado, Public Member

Ricardo Sanchez, Public Member

a. Summary of Discussion of Education Materials on Buprenorphine

Background

On February 6, 2025, the Board received a presentation on the challenges patients face when trying to receive addiction medication such as buprenorphine. When prescriptions are red flagged, patients can be denied access to their medication. Several doctors and healthcare advocates provided explanations for certain patient behaviors, such as why multiple patients may have the same address, why a patient appears nervous and anxious, or the reason a patient may try to obtain an early refill of their medications. In the June 2025 committee meeting members reviewed educational materials intended to be provided through the subscriber alert, the newsletter and posted on the website. Members provided feedback and materials went back to staff for further refinement.

Summary of Committee Discussion

During the meeting, members discussed edits made to the revised materials and noted support for both the materials and the recommended resource materials included via link, ["The Pharmacy Access to Resources and Medication for Opioid Use Disorder \(PhARM-OUD\) Guideline, A Joint Consensus Practice Guideline from the National Association of Boards of Pharmacy and the National Community Pharmacists Association."](#)

Attachment 1 includes draft material on buprenorphine.

b. Summary of Discussion of Public Education Materials Related to the Federal Three-Day Rule

Relevant Law

[Business and Professions Code \(BPC\) section 750](#) requires specified boards that license prescribers to develop informational and educational material regarding the Federal "Three Day Rule" on an annual basis.

Communication and Public Education Committee Chair Report

Board Meeting January 26-27, 2026

Page 1 of 5

Background

Provisions in BPC 750 became effective January 1, 2025. As included in the statute, the Board is required to develop and release information on the Federal "Three Day Rule" to ensure prescriber awareness of existing medication-assisted treatment pathways to serve patients with a substance use disorder.

The Department of Consumer Affairs provided materials to be distributed by all healing arts Boards by December 31, 2025 to ensure compliance with the legislative mandate. Staff posted the material on the website and sent out a subscriber alert to licensees. To stay in compliance, the Three-Day Rule materials will be released every year.

Summary of Committee Discussion

During the meeting, members acknowledged that it is a helpful reminder and indicated they agree that the information presented is appropriate. The notice is included in **Attachment 2**.

c. Summary of Discussion of Master Calendar of Public Education Campaigns

Background

Several strategic objectives for the Committee support the Committee's strategic goal to educate consumers, licensees and stakeholders about the practice and regulation of the profession.

To ensure a number of the Committee's strategic objectives are met, staff has developed a Master Calendar of educational campaigns, many of which align with state and national initiatives. The proposed calendar includes dates and tasks for the 2026 year.

Summary of Committee Discussion

During the meeting, members suggested the calendar to include presentations that Board staff provides to schools.

Members also more generally discussed education provided regarding new legal requirements and changes in law. Members requested a subscriber alert to be released that includes one page focusing on new laws with a link to the ask inspector program.

Implementation Status: Since the meeting, the calendar has been updated to reflect the months staff typically provides outreach to the California schools including an offer presentations.

Staff created a one-page resource guide that includes 2025 Legislative Bills with links and the ask inspector contact information. This information has been added to the Laws and Regulations page of the Board website.

Further, consistent with the master calendar, on January 12th, National Pharmacist's Day, the Board released an alert thanking pharmacists for their continued commitment and dedication to California patients.

Attachment 3 includes a copy of the proposed calendar.

Attachment 4 includes a copy of the one-page resource guide.

Attachment 5 includes a copy of the communication to pharmacists for Pharmacist Day.

d. Summary of Discussion of Notice on How to File a Complaint

Relevant Law

[Business and Professions Code section 4113.6](#), establishes requirements for chain community pharmacies. As recently amended under provisions in Assembly Bill 1503 (Berman, Chapter 196, Statutes of 2025), a chain community pharmacy is required to post, in a prominent place for pharmacy personnel, a notice that provides information on how to file a complaint with the Board.

Background

During the November 2025 Board meeting, members discussed various implementation activities related to AB 1503, including the provisions above. Members referred development of a sample notice to the Communication and Public Education Committee.

Subsequent to this direction, staff developed a sample notice. As drafted, the notice includes the use of QR codes. The first QR code would take pharmacy personnel to the Board's webpage where they can file a complaint with the Board. The second QR code (at the bottom of the sample notice) would take the individual to the page with relevant pharmacy laws. The draft notice also includes the address to mail in a complaint, should an individual elect to mail in the information.

Summary of Committee Discussion

During the meeting, members noted general agreement with the draft notice, underscoring that the notice is for pharmacy personnel. Members suggested to make the title of the notice, How to File a Complaint with the California State Board of Pharmacy. Staff suggested changing the wording for the lawbook to say, “scan here for a compilation of relevant pharmacy laws.”

Implementation Status:

Since the meeting, the changes mentioned have been made to the sample notice and are reflected in **Attachment 6**.

e. Summary of Discussion of Update on Communication and Public Education Activities by Staff

1. The Script

The Board recently released its [November 2025](#) newsletter. The issue highlighted changes in pharmacy law, provided updates on the reporting of medication error and provided education are a variety of topics including provisions for pharmacist-initiate immunization, routine inspection outcomes and the Board’s citation and fine program.

Implementation Status:

Since the meeting, a Special Edition newsletter on AB 1503 was released on January 12, 2026, with a corrected version issued January 15, 2026. The newsletter can be found on the Board website and a notification of the release was sent in a subscriber alert and posted on Twitter.”

2. Staff Outreach

A list of presentations and trainings by individual staff members is in **Attachment 7**.

3. News Media Inquiries

A list of media inquiries is in **Attachment 8**.

4. Social Media

Staff met with the DCA communications team and discussed options on how to increase the Board's presence to stakeholders. During the meeting members received information about possible recommendations to increase the Board's social media presence.

Summary of Committee Discussion

During the meeting, committee members and staff considered several impacts of adding social media. It was noted that licensees are required by law to sign up to receive subscriber alerts to ensure communication from the Board. Further, the Committee discussed using the Department of Consumer Affairs (DCA) to learn more about missed opportunities when not using social media, AI, the importance of Public Records Act (PRA) requests and record retention, Americans with Disabilities Act (ADA) compliance, identity fraud risks and reaching out to DCA for education on AI security. Members considered outreach to consumer groups and a campaign to remind patients not to use AI for medical advice in place of a pharmacist. It was noted that the communication from the Board is dry and needs to be less intimidating. Members appeared to reach consensus that should the Board expand its use of social media; it should focus on one-way communication.

Implementation Status: As part of the committee's decision, staff created visual graphics for the listserv. A BOP logo will be included at the footer of future subscriber alerts.

Attachment 1

Corresponding Responsibility Considerations for Dispensing Buprenorphine

State and Federal law establish that pharmacists share a corresponding responsibility with prescribers to ensure controlled substances are dispensed solely for a legitimate medical purpose and within the bounds of professional practice. Because buprenorphine is most often prescribed for the treatment of Opioid Use Disorder (OUD), its therapeutic intent should be a key part of the pharmacist's evaluation. Pharmacists are legally required to verify the legitimacy of the prescriber and the appropriateness of the prescription. This assessment should reflect buprenorphine's established role in preventing withdrawal, reducing cravings, supporting long-term recovery, and lowering rates of overdose, emergency department visits, hospitalizations and death.

Research consistently shows that access to buprenorphine is protective. Given the clinically significant distinctions in buprenorphine's use, pharmacists are obligated to balance vigilance for potential concerns with an understanding that delaying or denying buprenorphine can expose patients with OUD to serious harm.

Pharmacists should also be aware that commonly cited indicators of potentially fraudulent controlled substance prescriptions do not always translate well to buprenorphine used for OUD treatment. Long travel distances, telehealth prescribing, cash payment, early refills, or use of multiple pharmacies often reflect limited availability of prescribers or pharmacies, particularly in rural or underserved areas, rather than misuse or diversion. Because interruptions in buprenorphine therapy can increase the risk of relapse and overdose, pharmacists are encouraged to take these access challenges into account, communicate with prescribers when questions arise, and support continuity of care when prescriptions are determined to be legitimate.

Additional resources are available to assist pharmacists in identifying practice considerations, including ["The Pharmacy Access to Resources and Medication](#)

for Opioid Use Disorder (PhARM-OUD) Guideline, A Joint Consensus Practice
Guideline from the National Association of Boards of Pharmacy and the
National Community Pharmacists Association.”

Updated 1.5.2026

Draft

Attachment 2

“Three Day Rule” for Initiating Opioid Maintenance or Detoxification Treatment to Patients

Date: **[Insert Date]**

To: Prescriber Licensees

Subject: Dispensing Opioid Treatments to Initiate Maintenance or Detoxification Treatment Under The Federal Three Day Rule ([21 CFR § 1306.07\(b\)](#))

This notice is to inform you of an important federal rule that may apply in your practice when making arrangements to refer a patient to a narcotic treatment program for opioid use disorder (OUD).

Business and Professions Code section 750 requires the Board to post online and annually disseminate this informational material to licensees authorized to write or issue controlled substance prescriptions pursuant to Health and Safety Code section 11150.

“Three Day Rule” for Opioid Use Disorder Treatment

Under federal and state law ([21 CFR § 1306.07\(b\)](#) and Health & Saf. Code, § 11158), authorized practitioners who are not specifically registered with the federal Drug Enforcement Administration to conduct a narcotic treatment program (NTP) may dispense on an emergency basis Schedule II narcotic medication (e.g., methadone) to patients for the purpose of initiating maintenance treatment or detoxification treatment (or both).

Key Requirements of the Rule:

- Practitioners may dispense up to a three-day supply of Schedule II narcotic medication while referral to opioid treatment is being arranged.
- Not more than a three-day supply may be dispensed to one person for one person's use. This emergency treatment may not be renewed or extended.
- The rule is intended as a short-term emergency bridge until the patient can be admitted to a licensed NTP.

The Three Day Rule represents one pathway for practitioners to dispense Schedule II medications to initiate treatment for OUD. For more information about the Three Day Rule and other pathways to treat OUD, see the Additional Resources at the bottom of this notice.

For questions about this notice, contact the Board at **[insert contact information]**.

For more information about licensed narcotic treatment programs, review the online [provider directory](#) or contact the California Department of Health Care Services (DHCS), Licensing and Certification Division, Counselor and Medication Assisted Treatment Section at:

Website: [DHCS Licensing and Certification](#) Email: DHCSNTP@dhcs.ca.gov

Phone: (916) 322-6682

Additional Resources

[DEA Guidance on Development of Revised Three Day Rule \(Jan. 12, 2023\)](#)

[DEA Notice of Final Rule, Dispensing of Narcotic Drugs to Relieve Acute Withdrawal Symptoms of Opioid Use Disorder \(Aug. 8, 2023\)](#)

[DEA Practitioner's Manual, An Informational Outline of the Controlled Substances Act \(Rev. 2023\)](#)

[Substance Abuse and Mental Health Services Administration, Federal Guidelines for Opioid Treatment Programs \(Fall 2024\)](#)

[California Department of Public Health, Substance and Addiction Prevention Branch, Resources: Health Care Providers](#)

[Medical Board of California, Guidelines for Prescribing Controlled Substances for Pain \(July 2023\)](#)

Attachment 3

Master Calendar 2026 Public Education and Communication

January	<ul style="list-style-type: none">• Roundup for licensees (Subscriber/Website/Twitter)• Special Edition AB 1503 Newsletter• National Pharmacists Day (January 12)• CPJE notice January 26 for February 2 (Subscriber/Twitter)• Staff sends offer to schools to provide presentations to graduating students on the pharmacist exam and licensure process.
February	<ul style="list-style-type: none">• Roundup (Subscriber/Website/Twitter)
March	<ul style="list-style-type: none">• Roundup (Subscriber/Website/Twitter)• CPJE notice March 27 for April 4 (Subscriber/Twitter)• National Consumer Protection Week (March 1-7)• National Drug and Alcohol Facts Week• Develop FAQ on SB 497
April	<ul style="list-style-type: none">• Roundup (Subscriber/Website/Twitter)• Medication Safety Week (April 1-7)• Patient Access Week (April 5-11)• National Public Health Week (April 6-12)• World Health Day (April 7)• National Prescription Take Back Day, 25th
May	<ul style="list-style-type: none">• Roundup (Subscriber/Website/Twitter)• National Prevention Week• Newsletter
June	<ul style="list-style-type: none">• Roundup (Subscriber/Website/Twitter)• CPJE notice on June 4 for June 11 (Subscriber/Twitter)

July	<ul style="list-style-type: none"> • Roundup (Subscriber/Website/Twitter) • CPJE notice July 2, 21 and 30 for July 9, 28 and August 6 (Subscriber/Twitter) • Annual Report • Staff sends offer to schools to provide presentations to newly enrolled students on the intern licensure process.
August	<ul style="list-style-type: none"> • Roundup (Subscriber/Website/Twitter) • CPJE notice August 18 for August 25 • CDC Overdose Awareness (IOAD) • International Overdose Awareness Day (August 31)
September	<ul style="list-style-type: none"> • Roundup (Subscriber/Website/Twitter) • National Recovery Month • National Suicide Prevention Week (September 6-12) • World Pharmacists Day September 25, 2026 • CPJE notice for September 26
October	<ul style="list-style-type: none"> • Roundup (Subscriber/Website/Twitter) • Health Literacy Month • National Pharmacy Week (October 19-25) • Pharmacy Technician Day (October 20) • Check Your Meds Day (October 21) • National Prescription Drug Take Back Day (October 31)
November	<ul style="list-style-type: none"> • Roundup (Subscriber/Website/Twitter) • CPJE on November 6 and 26 for November 13 and December 3 • Education Campaign for New Laws
December	<ul style="list-style-type: none"> • Roundup (Subscriber/Website/Twitter)

Attachment 4



2025 Legislative Bills with Links

Governor Gavin Newsom has enacted several bills that introduce or revise existing laws regulating pharmacy practice in California. To read the full text of each law, click on the Assembly bill (AB) number or Senate bill (SB) number.

[**AB 50 Pharmacists: furnishing contraceptives.**](#) Expands pharmacist authority of over-the-counter contraceptives.

[**AB 82 Health care: legally protected health care activity.**](#) Expands confidentiality for reproductive and gender-affirming health care providers.

[**AB 144 Committee on Budget. Health.**](#) Establishes baseline for vaccine coverage for the immunization schedule recommended by the Advisory Committee on Immunization Practices as of January 1, 2025.

[**AB 260 Sexual and Reproductive Health Care.**](#) Protects reproductive healthcare access, including medication abortion.

[**AB 309 Hypodermic needles and syringes.**](#) Deletes the January 1, 2026 repeal date that allows licensees to provide hypodermic needles and sterile

syringes for human use without a prescription or permits if certain conditions are met.

AB 447 Emergency room patient prescriptions. Allows physicians or authorized prescribers to dispense an unused portion of a non-controlled medication to an emergency department patient upon discharge if certain conditions are met.

AB 489 Health care professions: deceptive terms or letters: artificial intelligence. Prohibits the use by artificial intelligence (AI) or generative artificial intelligence (GenAI) technology of certain terms, letters, or phrases that indicate or imply that the advice, care, reports, or assessments being provided through AI or GenAI is being provided by a natural person with the appropriate health care license or certificate.

AB 1152 Controlled substances: human chorionic gonadotropin. Removes human chorionic gonadotropin (hCG) from the list of Schedule III controlled substances under the California Uniform Controlled Substances Act.

AB 1503 Pharmacy Sunset Oversight Review Report. Makes changes to Pharmacy Law and Board operations, including extending the Board for four years until January 1, 2030.

SB 40 Health care coverage: insulin. Prohibits a health care service plan or health insurer from imposing step therapy as a prerequisite to authorizing coverage of insulin.

SB 41 Pharmacy benefits. Establishes the regulation of Pharmacy Benefit Managers (PBMs) within the California Department of Managed Healthcare (DMHC).

SB 306 Health care coverage: prior authorizations. Requires health care service plans and health insurers to report statistics to the DMHC and the Department of Insurance annually beginning December 31, 2026, and, starting January 1, 2028, to cease requiring prior authorization for the most

frequently approved covered health care services that are approved at a rate that meets or exceeds the threshold rate of 90%. These requirements will be repealed on January 1, 2034.

SB 470 Bagley-Keene Open Meeting Act; teleconferencing. Authorizes a state body to hold a meeting by teleconference subject to specified requirements.

SB 497 Legally protected health care activity. Prohibits the release of medical information related to gender affirming health care or gender-affirming mental health care, as defined in the bill.

SB 568 Pupil health: epinephrine delivery systems: school sites and childcare programs. Expands the authority of pharmacies to provide a broader range of epinephrine delivery devices.

This is for informational purposes only. Please use the links provided to familiarize yourself with the law.

A compilation of changes to laws is available [here](#).

The [November 2025 Issue of the Script](#) and the [January 2026 Special Edition of The Script](#) provides additional information regarding many of the measures sited above.

The California State Board of Pharmacy does not offer legal advice. Such requests should be directed to your attorney. While we can share with you commonly accepted interpretations of applicable laws and regulations, it should be noted that the applicability of statutes and regulations depend ultimately on the distinctive nature of a particular case, which will change given a different set of circumstances.

For general questions about pharmacy law or regulations, please visit contact the [Ask and Inspector call line or email](#).



Attachment 5

— happy pharmacist day —

The California State Board of Pharmacy would like to shine a spotlight on all the pharmacists and say thank you for the impact you make every day.

Hello everyone and Happy National Pharmacists Day!

I want to take this time to personally thank all of you for your hard work and dedication to patient care. We often say, and it is worth repeating, you are the most accessible healthcare professional in your community, and the last line of defense in preventing medication errors.

We, here at the Board, recognize the hard work you put in and we want to let you know we appreciate the quality health care you provide to consumers, patients and communities each and every day.

Thank you!

President Seung Oh



Attachment 6

How to File a Complaint with the California State Board of Pharmacy



How to file a complaint with the California Board of Pharmacy:

- Use QR Code Above
- Download a complaint form and mail to:
Board of Pharmacy
Attention: Complaint Unit
2720 Gateway Oaks Drive, Suite 100
Sacramento, CA 95833

To facilitate the Board's review of your complaint, please provide as much detailed information as possible and include copies of any relevant supporting documentation.

Scan here for a compilation of relevant pharmacy laws.



As a reminder, if conditions present an immediate risk of death, illness, or irreparable harm to patients, personnel, or pharmacy staff, as specified in Business and Professions Code section 4113(d), the Board has established the following email, PharmacyAlert@dca.ca.gov, for reporting.

Note: The Board welcomes and investigates all complaints received, including anonymous complaints. However, investigations of anonymous complaints may be difficult to investigate because investigators may need additional information from the complainant to establish facts necessary to prove a violation.

Attachment 7

Board of Pharmacy (BOP)

Staff Outreach Activities

Board staff reported the following outreach activities:

- June 12, 2025, Presentation on Pharmacy Law Updates 2025, Joint Meeting of the San Gabriel Valley Chapter, California Pharmacist Association and San Gabriel Valley Chapter, California Society of Hospital Pharmacists.
- August 19, 2025, Presentation on The Master File Process, California Society of Health Systems Pharmacist.
- August 20, 2025, Presentation on Pharmacy Law Updates 2025, Sacramento Chapter, California Society of Health Systems Pharmacists.
- August 25, 2025, Presentation: Loma Linda University Intern School Presentation
- August 26, 2025, Presentation: Keck Graduate Institute Intern School Presentation
- September 15, 2025, Training to the Division of Investigation for the Department of Consumer Affairs in Pomona.
- October 4, 2025, Presentation: Pharmacy Law Updates 2025, California Pharmacists Association.
- October 31, 2025, Co-Presenter: The Human Value of Recovering Clinical Practitioners, California Society of Health Systems Pharmacists.
- November 1, 2025, Presentation: Board of Pharmacy Update, California Society of Health Systems Pharmacists.
- November 12, 2025, Presentation: Board of Pharmacy Overview, Students, Chapman University, School of Pharmacy.
- December 1, 2025, Presentation: Board of Pharmacy Overview, Students, University of California San Diego, School of Pharmacy.
- December 17, 2025, Prescriptions and Patients, Addressing Challenges, Finding Opportunities, A Joint Forum on Controlled Substances and Medications for Opioid Use Disorder Access.

Attachment 8

Media Inquires

June 1, 2025 – December 31, 2025

6/9, Lena Beck, Veterinary Information Network News Service, asked if veterinarians are required to report gabapentin prescriptions.

6/10, Jose Moreno Del Angel (Edward Moreno), Sherwood News, had a public records act request for inspection documents for TMC Acquisitions LLC dba Tailor Made Compounding in Nicholasville, Ky from January 1, 2021, to June 10, 2025.

6/23, Paige Tortorelli, CNBC Universal, asked about complaints on prescription drug programs that companies use as a go-between wholesalers and pharmacies.

6/30, Julian Gill, Houston Chronicle, requested all inspection documents for Empower Pharmacy.

7/9, Julian Gill, *Houston Chronicle*, asked if pharmacy technicians perform inspections and how many inspectors are employed with the Board.

On 7/23, Andrew Oxford, Bloomberg Industry Group, requested an interview with BOP to discuss the Sunset Review and AB 1503.

8/27, Tom Murphy, *The Associated Press*, asked if pharmacists in California are limited to administering only vaccines that have been recommended by the CDC Advisory Committee.

9/10, Julian Gill, Houston Chronicle, requested an interview to discuss disciplinary actions on Empower Pharmacy.

10/1, Micheal Williams, The Capitol Forum, requested all license renewal inspections conducted by BOP for any facility in the United States that was inspected from January 1, 2025, to September 30, 2025.

10/20, Blake Ellis, CNN, contacted the Medical Board of California (MBC) and BOP regarding the prescribing habits of [Dr. Armaghan Azad](#), indicating they had billed more than \$160 million in prescriptions to Medicare, including the Shingrix vaccine to more than 200,000 people for a total of \$60 million. The reporter asked whether Dr. Azad is a designated prescriber for this vaccine, and if so, how this designation works, including whether the physician is paid by pharmacies or pharmaceutical companies.

11/13, Alice Tracey, The Capitol Forum, requested communication information between BOP and Imprimis RX from the time that the first amended accusation

was filed against Imprimis RX. On 12/8, the reporter asked if it is common for the Board to offer a two-month license extension and shorter renewal times while accusations are pending.

12/3, Edward Moreno, Sherwood News, requested 2025 inspection reports for Strive Pharmacy and investigatory materials concerning the inappropriate handling or compounding of ketamine at [Strive Pharmacy](#).

12/9, Lisa Halverstadt, Voice of San Diego, asked if BOP received a complaint regarding San Diego County's Chief Pharmacist Officer, Tram "Emily" Do, and if so, what did it include and can BOP confirm her pharmacy license number.