



## **COMMUNICATION AND PUBLIC EDUCATION COMMITTEE**

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

### **I. Call to Order and Establishment of Quorum**

### **II. Public Comment for Items Not on the Agenda; Matters for Future Meetings**

*The committee may not discuss or act on any matter raised during the public comment section that is not included on this agenda, except to place the matter on a future meeting agenda. [Government Code sections 11125 & 11125.7(a)]*

### **III. Discussion and Possible Action to Approval the Draft Minutes of the June 12, 2025, Communication and Public Education Committee Meeting**

A draft of the minutes is in **Attachment 1**.

### **IV. Discussion and Consideration 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. Patients who display red flag behaviors at pharmacies 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 our June 2025 committee meeting members provided feedback and the materials went back to staff for further refinement.

#### At Today's Meeting

During the meeting members will have an opportunity to consider the updated draft., which is included in **Attachment 2**.

### **V. Discussion and Consideration 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.

#### 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.

#### At Today's Meeting

These materials are being brought to committee for members to review and determine if any edits should be made for future release.

The notice is included in **Attachment #3**.

### **VI. 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 include dates and tasks for the 2026 year.

#### At Today's Meeting

During the meeting members will have the opportunity to review the calendar and provide feedback to staff.

Attachment #4 includes a copy of the proposed calendar.

### **VII. Discussion and Consideration on the Notice on How to File a Complaint**

Communication and Public Education Committee Meeting – January 8, 2026

### 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 Board's Pharmacy Law page. As draft the notice also includes the address to mail in a complaint, should an individual elect to mail in the information.

### At Today's Meeting

During the meeting members will have the opportunity to review the sample notice and provide feedback to staff. The sample notice is included in

### **Attachment #5**

## **VIII. Update on Communication and Public Education Activities by Staff**

### **a. The Script**

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

A Special Edition will be released in January 2026 and will focus on AB 1503.

### **b. Staff Outreach**

**Attachment 6** has a list of dates and locations of where these presentations took place. These presentations cover multiple topics, including updates in Pharmacy Law.

**c. News Media Inquires**

A list of media is in **Attachment 7**.

**d. 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 will receive information about possible recommendations to increase the Board's social media presence.

**IX. Future Meeting Dates**

- June 10, 2026

*Meeting dates are subject to change.*

**X. Adjournment**

**Upon Conclusion of Business**

# **Attachment 1**



## Communication and Public Education Committee DRAFT Meeting Minutes

**DATE:** Thursday, June 12, 2025

**LOCATION:** California State Board of Pharmacy  
2720 Gateway Oaks Drive, Hearing Room, First Floor  
Sacramento, CA 95833  
Participation also through teleconference via Webex

### COMMITTEE

**MEMBERS PRESENT:** Nicole Thibeau, PharmD, Licensee Member,  
Chairperson  
J. Newell, Public Member, Vice Chairperson  
Renee Barker, PharmD, Licensee Member  
Claudia Mercado, Public Member

**STAFF PRESENT:** Anne Sodergren, Executive Officer  
Julie Ansel, Deputy Executive Officer  
Debbie Damoth, Senior Administration Manager  
Sara Jurens, Public Information Officer  
Shelley Ganaway, Board Counsel

### I. Call to Order and Establishment of Quorum

Dr. Thibeau called the Communication and Public Education Committee meeting to order at 2:00pm. Dr. Thibeau reminded all present that the Board is a consumer protection agency. Dr. Thibeau advised the meeting was being conducted in person and through teleconference via Webex and asked the moderator to provide general instructions on providing public comment via Webex. The meeting moderator provided updated WebEx instructions for members of the public participating in the meeting. Dr. Thibeau took roll call: Present: Renee Barker, J. Newell, Claudia Mercado and Nicole Thibeau. Quorum established.

**II. Public Comment for Items Not on the Agenda; Matters for Future Meetings**

Members of the public were provided the opportunity to provide comments for items not on the agenda; no comment was provided by the public, however, member Claudia Mercado asked if the Department of Consumer Affairs (DCA) could provide the Board with a presentation on how they can help the Board with marketing to have a bigger impact and to be transparent with constituencies.

**III. Approval of the July 18, 2024, Communication and Public Education Committee Meeting Minutes**

Dr. Thibeau referenced the draft minutes from the July 18, 2024, Communication and Public Education Committee meeting. Members were provided an opportunity to comment. No comments were made.

**Motion:** Approve the July 18, 2024, Communication and Public Education Committee meeting minutes as presented in the meeting materials.

**M/S:** Barker/Newell

Members of the public were provided with an opportunity to provide public comment; however, no comment was provided.

**Support: 4   Oppose: 0   Abstain: 0   Not Present: 0**

| <b>Committee Member</b> | <b>Vote</b> |
|-------------------------|-------------|
| Newell                  | Support     |
| Barker                  | Support     |
| Mercado                 | Support     |
| Thibeau                 | Support     |

**IV. Education Materials on Buprenorphine**

Members received education materials on Buprenorphine which included the challenges patients face when trying to receive this prescription and other addiction medication. As part of the discussion, members suggested removing the term “four corners,” including direct information from the relevant guidelines, clarifying the content to convey information more

directly, and to include a link to the relevant guidelines. Members also suggested developing a Continuing Education (CE) course focused on dispensing buprenorphine. The educational material is intended to be provided through the subscriber alert, included in the next newsletter and be posted on the Board's website.

## **V. Discussion and Consideration of Committee's Strategic Objectives**

The Committee's Strategic Objectives were made available for members to review. Staff listed the objectives in this report and provided comments for each objective for the committee's consideration. After reviewing the objectives, committee members were offered the opportunity to provide comments or direction to staff regarding the strategic goals.

### **Strategic Objective 4.1**

Member Mercado inquired about what the Board's visibility level is online as the Board develops educational campaigns. Dr. Thibeau inquired about obtaining engagement information for the Board's social media posts. Member Mercado expressed support for social media beyond the Board's X account as she believes the public is interested in engaging with state agencies. Member Newell expressed reservations with LinkedIn and other social media due to the political climate and the risk to the Board being put in a vulnerable position.

### **Strategic Objective 4.3**

Dr. Thibeau inquired on the status of transitioning the self-assessment process online to make it more interactive. Deputy Executive Officer Julie Ansel explained that the self-assessment is transitioning to a new process, which is under development and Board staff are evaluating different options. Ms. Ansel noted that once self-assessment requirements are established in statute, the Board will have more flexibility. Additional updates will be available at future meetings.

### **Strategic Objective 4.7**

Dr. Thibeau inquired by the frequency of recall subscriber alerts and perhaps they can be sent out at the same time every day or once a week. Dr. Barker indicated that getting the recalls in real time is important and that she



believes getting them once a week would defeat the purpose. Dr. Thibeau indicated that an end of week roundup would be helpful.

#### **Strategic Objective 4.8**

Dr. Thibeau expressed support for recognizing pharmacists that are performing the work that the Board is promoting and sought feedback from members on this objective. Member Mercado expressed support recognizing new pharmacists to uplift the profession. Member Newell expressed concern with the Board nominating a pharmacist as that Board could be left in an unfavorable position should that licensee do something negative in the future and the Board publicly supported them. Member Newell inquired if the Board has done commercial advertising and what, if any, were the engagement results from that endeavor. Ms. Ansel explained to the members that the Board has previously displayed a billboard along freeways and that research would need to be completed by Board staff to determine if engagement results are available.

#### **VI. Update on Communication and Public Education Activities by Staff**

The Board's Public Information Officer, Sara Jurrens, gave a report on activities by staff.

##### **The Script**

The Board released a newsletter in [May 2025](#).

##### **Staff Outreach**

Presentation and Training: A list of activities by individual staff members, from January to June, was made available for Committee members.

##### **News Media Inquires**

Committee members were provided information of the news media inquiries.

#### **VII. Future Meeting Dates**

Dr. Thibeau thanked everyone for their time and suggested consulting the website for future meeting dates.

#### **VIII. Adjournment**

The meeting was adjourned at 3:03pm.

# **Attachment 2**

## **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.

Buprenorphine is primarily used in the treatment of Opioid Use Disorder (OUD) and as such, the clinical purpose of the prescription must be considered as part of a pharmacist's assessment. Pharmacists are legally required to verify the legitimacy of the prescriber and the appropriateness of prescription. While opiates pose a high risk of abuse potential for patients, buprenorphine when used to treat OUD, is used to prevent withdrawal, to reduce cravings, and support recovery. Given the clinically significant distinctions in buprenorphine's use, pharmacists are obligated to monitor indicators of concern, while simultaneously acknowledging that improper denial of buprenorphine to a patient with OUD can have severe consequences. Although establishing a strong patient relationship is preferable, it may not be achievable. It is essential to consider the different circumstances patients may face.

Examples may include, the geographical distance between the pharmacy and/or the prescriber and the patient including telehealth settings, and/or an early refill that could indicate a change in dose, lost or damaged a dosage unit, or patient preparation for changes in residence or insurance benefits.

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."](#)

# **Attachment 3**

## **“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](mailto: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 4**

## Master Calendar 2026 Public Education and Communication

|                 |  |
|-----------------|--|
| <b>January</b>  | <ul style="list-style-type: none"> <li>• Roundup for licensees (Subscriber/Website/Twitter)</li> <li>• Substance Use Disorder Treatment Month</li> <li>• Special Edition AB 1503 Newsletter</li> <li>• National Pharmacists Day (January 12)</li> <li>• CPJE notice January 26 for February 2 (Subscriber/Twitter)</li> </ul>                          |
| <b>February</b> | <ul style="list-style-type: none"> <li>• Roundup (Subscriber/Website/Twitter)</li> </ul>   |
| <b>March</b>    | <ul style="list-style-type: none"> <li>• Roundup (Subscriber/Website/Twitter)</li> <li>• CPJE notice March 27 for April 4 (Subscriber/Twitter)</li> <li>• National Consumer Protection Week (March 1-7)</li> <li>• National Drug and Alcohol Facts Week</li> <li>• Subscriber alert for licensees on SB306</li> <li>• Develop FAQ on SB 497</li> </ul> |
| <b>April</b>    | <ul style="list-style-type: none"> <li>• Roundup (Subscriber/Website/Twitter)</li> <li>• Medication Safety Week (April 1-7)</li> <li>• Patient Access Week (April 5-11)</li> <li>• National Public Health Week (April 6-12)</li> <li>• World Health Day (April 7)</li> <li>• National Prescription Take Back Day, 25th</li> </ul>                      |
| <b>May</b>      | <ul style="list-style-type: none"> <li>• Roundup (Subscriber/Website/Twitter)</li> <li>• National Prevention Week</li> <li>• Newsletter</li> </ul>   |
| <b>June</b>     | <ul style="list-style-type: none"> <li>• Roundup (Subscriber/Website/Twitter)</li> <li>• CPJE notice on June 4 for June 11 (Subscriber/Twitter)</li> </ul>   |



|                  |   |
|------------------|---|
| <b>July</b>      | <ul style="list-style-type: none"> <li>• Roundup (Subscriber/Website/Twitter)</li> <li>• CPJE notice July 2, 21 and 30 for July 9, 28 and August 6 (Subscriber/Twitter)</li> <li>• Annual Report</li> </ul>   |
| <b>August</b>    | <ul style="list-style-type: none"> <li>• Roundup (Subscriber/Website/Twitter)</li> <li>• National Immunization Awareness Month</li> <li>• CPJE notice August 18 for August 25</li> <li>• CDC Overdose Awareness (IOAD)</li> <li>• International Overdose Awareness Day (August 31)</li> </ul>   |
| <b>September</b> | <ul style="list-style-type: none"> <li>• Roundup (Subscriber/Website/Twitter)</li> <li>• National Recovery Month</li> <li>• National Suicide Prevention Week (September 6-12)</li> <li>• World Pharmacists Day September 25, 2026</li> <li>• CPJE notice for September 26</li> </ul>  |
| <b>October</b>   | <ul style="list-style-type: none"> <li>• Roundup (Subscriber/Website/Twitter)</li> <li>• Health Literacy Month</li> <li>• American Pharmacist Month</li> <li>• CPJE notice for October 13</li> <li>• National Pharmacy Week (October 19-25)</li> <li>• Pharmacy Technician Day (October 20)</li> <li>• Check Your Meds Day (October 21)</li> <li>• National Prescription Drug Take Back Day (October 31)</li> <li>• Newsletter</li> </ul> |
| <b>November</b>  | <ul style="list-style-type: none"> <li>• Roundup (Subscriber/Website/Twitter)</li> <li>• CPJE on November 6 and 26 for November 13 and December 3</li> </ul>  |
| <b>December</b>  | <ul style="list-style-type: none"> <li>• Roundup (Subscriber/Website/Twitter)</li> </ul>  |

# **Attachment 5**

## Your Voice Is Important!



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 The Pharmacy Lawbook



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](mailto: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.*

**California State Board of Pharmacy**

# **Attachment 6**

## **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.

# **Attachment 7**

## 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.