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

California State Board of Pharmacy
Department of Consumer Affairs
DRAFT Enforcement and Compounding Committee Meeting Minutes

Date: April 16, 2026

Location: OBSERVATION AND PUBLIC COMMENT IN PERSON:
California State Board of Pharmacy
2720 Gateway Oaks Drive, First Floor Hearing Room
Sacramento, CA 95833

Board of Pharmacy staff members were present at the observation and public comment location. All Committee members participated from remote locations via Webex.

PUBLIC PARTICIPATION AND COMMENT FROM REMOTE LOCATIONS VIA WEBEX

Board Members Present:
Maria Serpa, PharmD, Licensee Member, Chair
Renee Barker, PharmD, Licensee Member, Vice Chair
Jeff Hughes, Public Member
Seung Oh, PharmD, Licensee Member
Ricardo Sanchez, Public Member
Nicole Thibeau, PharmD, Licensee Member

Staff Present:
Anne Sodergren, Executive Officer
Julie Ansel, Deputy Executive Officer
Corinne Gartner, DCA Counsel
Deepi Miller, DCA Regulations Counsel
Julie McFall, Executive Specialist Manager

I. Call to Order, Establishment of Quorum, and General Announcements

Chairperson Serpa called the meeting to order at approximately 9:00 a.m. Dr. Serpa reminded everyone that the Board is a consumer protection agency charged with administering and enforcing Pharmacy Law. Department of Consumer Affairs' staff provided instructions for participating in the meeting.

Roll call was taken. The following members were present via Webex: Renee Barker, Licensee Member; Jeff Hughes, Public Member; Seung Oh, Licensee Member; Ricardo Sanchez, Public Member; Nicole Thibeau, Licensee Member; and Maria Serpa, Licensee Member. A quorum was established.

Dr. Serpa reminded Committee members to remain visible with cameras on throughout the open portion of the meeting. Dr. Serpa advised if a member needed to temporarily turn off their camera due to challenges with internet connectivity, they must announce the reason for their non-appearance when the camera was turned off.

II. Public Comments on Items Not on the Agenda/Agenda Items for Future Meetings

Members of the public participating from Sacramento and via Webex were provided the opportunity to comment; however, no comments were made.

III. Discussion and Possible Action to Approve Minutes of the January 7, 2026 Enforcement and Compounding Committee Meeting

The draft minutes of the January 7, 2026 Enforcement and Compounding Committee meeting were presented for review and approval. Members were provided the opportunity to comment; however, no comments were made.

Motion: Approve January 7, 2026 Enforcement and Compounding Committee meeting minutes as presented.

M/S: Oh/Barker

Members of the public participating from Sacramento and via Webex were provided the opportunity to comment; however, no comments were made.

Support: 6 Oppose: 0 Abstain: 0 Not Present: 0

Board Member	Vote
Barker	Support
Hughes	Support
Oh	Support
Sanchez	Support
Serpa	Support
Thibeau	Support

IV. Discussion and Possible Action to Make a Recommendation to the Board to Initiate a Rulemaking to Amend Title 16, California Code of Regulations, Section 1711, Regarding Quality Assurance Programs

Dr. Serpa recalled that in February 2024, the Board approved proposed regulation text to amend section 1711 related to quality assurance (QA) programs. In November 2024, the Board reviewed comments on the regulation, voted to amend the text in response to the comments received, and initiated an additional 15-day comment period. Subsequently, in January 2025, the Board reviewed comments on the regulation, voted to amend the text again in response to the comments received, and initiated a second 15-day comment period. During the March 2025 Board meeting, members considered comments received and the regulation text, and discussed the importance of emphasizing a quality assurance program that requires a systematic review of medication errors.

Dr. Serpa noted that the Board's discussions recognized that the current QA regulation's purpose was to minimize medication errors by analyzing errors, both individually and collectively. Members considered that the regulation, as written, focused on reporting and analyzing only individual errors, and discussed the importance of an aggregate medication error analysis. Dr. Serpa further noted that the Board deferred a decision on the QA regulation to allow staff to develop possible language to include an emphasis on aggregate medication error analysis.

During the June 2025 Board meeting, staff advised that the one-year timeframe to complete the QA rulemaking would end on August 25, 2025, and the Board voted to withdraw the QA rulemaking. This approach enabled the Board to continue its policy discussion on how to address both individual and aggregate medication error analyses and initiate a future rulemaking with clear regulatory language to address the Board's policy.

Dr. Serpa noted that the meeting materials included a copy of proposed draft amendments to section 1711, as recommended by staff. The proposal includes additional language on medication error analysis and aligns the definition of "medication error" with the definition in BPC 4113.1. The proposed language also requires that the pharmacy shall establish policies

and procedures that define the facility's overall QA program requirements, including the process for medication error reviews, notification to impacted parties, the frequency of aggregate medication error reports, the frequency with which the PIC is required to review individual and aggregate reports, and the method to communicate process improvements to pharmacy personnel to mitigate and minimize errors.

Dr. Serpa stated that she believed the proposed amendments were appropriate and noted should the Committee believe the draft language was ready for consideration by the Board, the Committee could refer the proposed regulation amendments to the full Board.

Members were provided the opportunity to comment. Members spoke in general support of the proposal, and also discussed potential changes to the language.

Member Sanchez left the meeting at 9:29 a.m.

Members of the public participating in Sacramento were provided the opportunity to comment; however, no comments were made.

Members of the public participating via Webex were provided the opportunity to comment. The Committee heard comments regarding medication errors and support of QA programs. One commenter suggested adding "within California" to the proposed regulation text to avoid sharing error information with other states, and noted that pharmacy technicians should be included in the process and the analysis should be shared with all staff.

Members were provided the opportunity to comment having heard public comments. Members discussed that the policies and procedures could define the provisions for sharing within an organization. The Committee agreed to refer the draft language to the full Board for consideration and possible action.

V. Discussion and Possible Action to Make a Recommendation to the Board Regarding Updates to Frequently Asked Questions (FAQs) Related to Assembly Bill 1286 (Haney, Chapter 470, Statutes of 2023) – Including Updates to FAQs Regarding Medication Error Reporting

Dr. Serpa reminded members that as part of the Board's licensee education efforts, the Board has a series of Frequently Asked Questions (FAQs) available on its website to assist licensees in understanding pharmacy law and regulations. Dr. Serpa further recalled that as part of the Committee's discussion on implementation of Assembly Bill 1286, Board staff developed FAQs. The FAQs were most recently updated and approved by the Board during the October 2025 Board meeting. Dr. Serpa noted that based on questions raised by the regulated public, it was recommended that the FAQs be updated again. Specifically, Board staff proposed an update to the FAQs related to reporting requirements under California Medication Error Reporting (CAMER).

Dr. Serpa noted that question #9 was added related to infusion center pharmacies and CAMER reporting requirements to provide clarification.

Members were provided the opportunity to comment. Members discussed making technical changes throughout the FAQs to reflect that the requirements are currently (as opposed to prospectively) effective.

Members of the public participating in Sacramento were provided the opportunity to comment; however no comments were made.

Members of the public participating via Webex were provided the opportunity to comment. The Committee heard a comment from a medication safety officer who suggested inspectors be apprised of the updates to the FAQs. The Committee also heard a comment suggesting that there be more patient safety measures in outpatient surgery centers.

The Committee agreed to refer the updated FAQs to the full Board for consideration and possible action.

VI. Discussion and Possible Action to Make a Recommendation to the Board Regarding Updates to Frequently Asked Questions (FAQs) Related to Automated Drug Delivery Systems (ADDS)

Dr. Serpa noted staff were also suggesting updates to the current FAQs related to ADDS based on questions raised by licensees and changes to law enacted by the Board's sunset bill, Assembly Bill 1503 (Berman, Chapter 196,

Statutes of 2025) and Assembly Bill 447 (Gonzalez, Chapter 363, Statutes of 2025). Additionally, staff have reorganized and categorized the questions to help the regulated public more easily find topics of interest.

Members were provided the opportunity to comment. Members spoke in support of the revisions. Members discussed removing question 13 and question 23 and adding a table of contents to help navigate the FAQs.

Members of the public participating in Sacramento were provided the opportunity to comment; however, no comments were made.

Members of the public participating via Webex were provided the opportunity to comment. The Committee heard a comment noting that interactions between food and drugs are important and pharmacy technicians needed to be included in information sharing to identify drug interactions. Another commenter asked if the Board collaborated with DEA regarding question 23. Another commenter stated the FAQs would provide excellent help, spoke in support of keeping question 13, and suggested that "near misses" could be incorporated into the answer. The commenter also suggested that it may be appropriate to include a link to the DEA pharmacist manual in the response in question 23. A final commenter stated it would be helpful to define AUDS in question 1.

Members were provided the opportunity to comment having heard public comments. The Committee agreed to refer the updated FAQs to the full Board for consideration and possible action.

VII. Discussion and Possible Action to Make a Recommendation to the Board Regarding Updates to the Wholesaler/Third-Party Logistics Provider Self-Assessment (Form #17M-26)

Dr. Serpa noted that the Board requires specified licensees to periodically engage in the self-assessment process, which includes self-evaluation of a facility's compliance with state and federal laws as a means to promote compliance through self-examination and education. Self-assessment forms include a compilation of relevant laws applicable to the license type. Historically, the Board's self-assessment requirements resided in various provisions of pharmacy law and regulations. Dr. Serpa noted that the Board's sunset bill, AB 1503, centralized the self-assessment process into statute and that new BPC section 4040.6 provides that the self-assessment process be performed on a form approved by the Board in consultation with

stakeholders and posted on its website. Dr. Serpa further noted that AB 1503 allows the Board to streamline the process of annually updating the forms and ensures consistency in the Board's approach to promoting licensee self-compliance.

Dr. Serpa recalled that at the January Board meeting, the Board updated the Community Pharmacy / Hospital Outpatient self-assessment and introduced a new format for self-assessment forms. As noted during that discussion, the Board would continue updating all self-assessment forms as part of its annual law-update process. Dr. Serpa reminded members that the new format for self-assessment forms was arranged by pharmacy law and regulation category requirements and contained a hyperlink to the specific law section referenced.

Dr. Serpa referenced the meeting materials, which included a draft of the updated Wholesaler/Third-Party Logistics Provider self-assessment in the new format.

Members were provided the opportunity to comment. Members spoke in support of the updated form and suggested that a subscriber alert be sent to solicit feedback from licensees on the Wholesaler/Third-Party Logistics Provider self-assessment, and the other two self-assessment forms being considered at this meeting.

Members of the public participating in Sacramento were provided the opportunity to comment; however, no comments were made.

Members of the public participating via Webex were provided the opportunity to comment. The Committee heard a comment in support of obtaining input on the new form from designated representatives and responsible managers. The commenter also suggested the Board discuss whether distribution to independent nurse practitioners is allowed.

Members were provided the opportunity to comment having heard public comments. The Committee agreed to refer the updated Wholesaler/Third-Party Logistics Provider self-assessment to the full Board for consideration and possible action.

The Committee took a break from 10:14 a.m. – 10:30 a.m.

Roll call was taken. The following members were present via Webex: Renee Barker, Licensee Member; Jeff Hughes, Public Member; Seung Oh, Licensee Member;

Nicole Thibeau, Licensee Member; and Maria Serpa, Licensee Member. A quorum was established.

VIII. Discussion and Possible Action to Make a Recommendation to the Board Regarding Updates to the Surgical Clinic Self-Assessment (Form #17M-118)

Dr. Serpa noted that similar to the previous agenda item, staff had updated the Surgical Clinic self-assessment to incorporate new laws and also updated the format of the form. The updated form was included in the meeting materials.

Members were provided the opportunity to comment. Members spoke in support of the updated form and discussed potential technical edits. It was also noted that the footnote to the "services provided" section was left out intentionally on the justification that surgical clinics do need to provide the types of services when they apply for initial licensure.

Members of the public participating in Sacramento were provided the opportunity to comment; however, no comments were received.

Members of the public participating via Webex were provided the opportunity to comment. Members heard a comment suggesting the title of PIC be given to the consultant pharmacist in a surgical center .

Members were provided the opportunity to comment having heard public comments. The Committee agreed to refer the updated form to the full Board for consideration and possible action.

IX. Discussion and Possible Action to Make a Recommendation to the Board Regarding Updates to the Hospital Pharmacy Self-Assessment (Form #17M-14)

Dr. Serpa noted that staff had also revised the Hospital Pharmacy self-assessment form to incorporate new laws and update the format of the form, and highlighted that section 12 was added to be completed by the licensee if the hospital pharmacy furnishes drugs to outpatients, employees, or walk-in customers under their HSP license. Dr. Serpa noted this approach streamlines the self-assessment process and ensures the hospital pharmacy is only completing one self-assessment form.

Members were provided the opportunity to comment. Members discussed the language in the section covering policies and procedures. Members also

discussed adding "if applicable" language and possibly taking a different approach to offering "N/A" as an option for every item. A member recommended replacing "other permit" with "other license" on page 2 and using LSC license number since the public is familiar with the shorten version. Members also discussed splitting out discharge and emergency room prescription under other services.

Members of the public participating in Sacramento were provided the opportunity to comment; however, no comments were made.

Members of the public participating via Webex were provided the opportunity to comment. The Committee heard a comment questioning if 12.22 was appropriate since that section is only applicable to home health or hospice. The commenter also suggested removal of the reference to HSC 11167.5 based on challenges with the DEA interpretation of the provisions.

Members were provided the opportunity to comment having heard public comments. The Committee agreed to refer the updated form to the full Board for consideration and possible action.

X. Discussion of Enforcement Statistics

Dr. Serpa advised the meeting materials included a summary of enforcement statistics for the third quarter of fiscal year 2025/26, noting the Board had initiated 2,863 complaints and closed 2,185 investigations. As of April 1, 2026, the Board had 2,185 investigations pending. Dr. Serpa noted the meeting materials provided a breakdown of the average timeframe for the various stages of the field investigation process.

Members were provided the opportunity to comment; however, no comments were made.

Members of the public participating in Sacramento and via Webex were provided the opportunity to comment; however, no comments were made.

IX. Advisement of Future Committee Meeting Dates

Dr. Serpa advised the next meeting was scheduled for June 10, 2026.

X. Adjournment

The meeting adjourned at 11:01 a.m.