



**California State Board of Pharmacy**  
 2720 Gateway Oaks Drive, Suite 100  
 Sacramento, CA 95833  
 Phone: (916) 518-3100 Fax: (916) 574-8618  
 www.pharmacy.ca.gov

Business, Consumer Services and Housing Agency  
 Department of Consumer Affairs  
 Gavin Newsom, Governor



**California State Board of Pharmacy  
 Department of Consumer Affairs  
 Licensing Committee Meeting Minutes**

**Date:** April 15, 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 A REMOTE LOCATION VIA WEBEX

**Board Members Present via Webex:**

Seung Oh, PharmD, Licensee Member, Chairperson  
 Satinder Sandhu, PharmD, Licensee Member, Vice Chairperson  
 Renee Barker, PharmD, Licensee Member  
 Jessi Crowley, PharmD, Licensee Member  
 Claudia Mercado, Public Member

**Board Members Not Present:**

Kartikeya "KK" Jha, RPh, 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 Oh called the meeting to order at approximately 9:01 a.m. Dr. Oh reminded all individuals present that the Board is a consumer protection agency charged with administering and enforcing Pharmacy Law. Where

protection of the public is inconsistent with other interests sought to be promoted, the protection of the public shall be paramount. Department of Consumer Affairs' staff provided instructions for participating in the meeting.

Roll call was taken. The following members were present via Webex: Satinder Sandhu, Licensee Member; Jessica Crowley, Licensee Member; Claudia Mercado, Public Member; and Seung Oh, Licensee Member. A quorum was established.

Dr. Oh reminded Committee members to remain visible with cameras on throughout the open portion of the meeting. Dr. Oh advised if members needed to temporarily turn off their camera due to challenges with internet connectivity, they must announce the reason for their nonappearance 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 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 regarding the law requiring notification by pharmacies that are going to close, noting that the law applied to grocery stores and pharmacies but did not apply to outsourcing facilities. The commenter also felt the Committee should discuss the CPJE and suggested it was unfair to students who come from out of state who do not have IPPE or APPE experiences in California.

## **III. Discussion and Possible Action to Approve Minutes of the January 8, 2026 Licensing Committee Meeting**

The draft minutes of the January 8, 2026 Licensing Committee meeting were presented for review and approval.

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

**Motion:** Approve the January 8, 2026 Licensing Committee meeting minutes as presented in the meeting materials.

**M/S:** Crowley/Mercado

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 related to the licensing statistics table and confusion on whether the data was listed in days or weeks and suggested to amend the table to identify days.

Member Barker joined the meeting at 9:17 a.m.

Members identified the comment was related to meeting materials and not meeting minutes and proceeded with the original motion.

**Support: 5 Oppose: 0 Abstain: 0 Not Present: 1**

<b>Board Member</b>	<b>Vote</b>
Barker	Support
Crowley	Support
Jha	Not Present
Oh	Support
Mercado	Support
Sandhu	Support

**IV. Discussion of and Possible Action to Make a Recommendation to the Board Regarding Policy Statement Related to New Requirements for Nonresident Pharmacies Included in Assembly Bill 1503 (Berman, Chapter 196, Statutes of 2025)**

Chairperson Oh advised AB 1503 made several changes to laws governing nonresident pharmacies and it was recommended that the Board release a policy statement to provide education and convey the Board's policy related to compliance and enforcement of the legal provisions.

Dr. Oh noted attachment 2 of the meeting materials contained the draft policy statement.

Members were provided the opportunity to comment. Members discussed whether stating that the PIC must be “actively working” at the nonresident pharmacy was appropriate, and whether the Board had received feedback from nonresident pharmacies regarding challenges in meeting the July 1, 2026 deadline. It was noted that AB 1503 was signed into law in October 2025, and while most provisions of the bill became effective on January 1, 2026, the Legislature provided a delayed effective date of July 1, 2026, for many of the provisions impacting nonresident pharmacies. Staff also reminded members that additional CPJE test dates were added to provide more opportunities for pharmacists seeking California licensure in order to serve as the PIC of a nonresident pharmacy, and noted that targeted outreach to nonresident pharmacies has been done to ensure awareness about the upcoming changes. Members discussed the possibility of having a dedicated webpage for nonresident pharmacies.

Members of the public participating from 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 the head pharmacist of a mail order pharmacy expressing frustration about the California licensure process. Another commenter spoke in general support of the draft policy but noted concern about the policy’s use of open-ended language such as “including but not limited to,” and suggested the Committee consider removing or narrowing such phrases where possible. A third commenter complimented the efforts of the Committee, noted questions he has heard from nonresident pharmacies, and suggested the policy be updated to address some of those questions.

Members were provided the opportunity to comment having heard public comments. Members appreciated the comments and noted the process for licensing can be complicated. Members agreed to review the draft policy in light of the comments, and discussed adding a disclaimer statement to highlight that the policy statement should not be considered an “all-inclusive” resource. Members also discussed developing a fact sheet on inspections specifically for nonresident pharmacies.

**V. Discussion of and Possible Action to Make a Recommendation to the Board Regarding Draft Frequently Asked Questions Related to Digitizing Pharmacy Records Consistent with Business and Professions Code Section 4105**

Chairperson Oh recalled one of the implementation activities related to Assembly Bill 1503 was to develop FAQs related to new provisions for digitizing pharmacy records. Dr. Oh noted the meeting materials contained four possible FAQs. Dr. Oh further noted that the Board is working on developing searchable FAQs with the Board approval date of each FAQ included.

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

Members of the public participating from 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. A commenter spoke in support of digitizing records and provided examples of how digitizing records could be done.

The Committee agreed to refer the FAQs to the full Board for consideration.

**VI. Discussion of Changes in Pharmacy Law Included in Assembly Bill 1503 (Berman, Chapter 196, Statutes of 2025) Including Updates on Implementation Activities**

Dr. Oh reminded members that Governor Newsom signed the Board's sunset measure, Assembly Bill 1503, on October 1, 2025, and that with this action, significant changes to Pharmacy Law became effective January 1, 2026.

Dr. Oh noted his appreciation for the Board's efforts to pursue so many important patient safety provisions and further noted the Board's legislative report and the final outcome on the measure reflected the Board's strong commitment to California consumers.

Dr. Oh recalled during the January 2026 meeting, the Committee received the first update on implementation activities undertaken since passage of the measure and at today's meeting additional updates will be reviewed. Dr. Oh reminded members that the Board released a newsletter at the end of January which detailed changes made in AB 1503. Additionally, the Board recently released a training webinar in its learning management system which approximately 184 individuals have completed.

**New BPC Section 4001.5, Related to the Pharmacy Technician Advisory Committee (PTAC)**

Dr. Oh advised that Dr. Satinder Sandhu had been appointed to serve as the Board member on the advisory committee and noted the Board Member Procedure Manual had been updated to reflect the addition of the PTAC. Dr. Oh also noted it was anticipated that the online application portal would be available by mid-May.

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

**Amended BPC Sections 4016.5, 4210, and 4233, Related to Advanced Pharmacist Practitioners (Formerly Known as Advanced Practice Pharmacists)**

Dr. Oh noted implementation activities related to the retitling of Advance Practice Pharmacist to Advanced Pharmacist Practitioner were underway, with section 100 regulation materials under review by the Office of Administrative Law, and the technical changes required in the Board's IT systems having been completed.

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

**Amended BPC Section 4036, Pharmacist Defined**

Dr. Oh noted that this statutory amendment clarified that pharmacists are not restricted to practicing only within the four walls of a licensed pharmacy and recalled that the Board voted to initiate a rulemaking to establish parameters for remote processing of prescriptions. Dr. Oh further noted that the rulemaking process was currently underway and, in order to avoid any potential issues related to that process, no further discussions would be held at this time.

**New BPC Sections 4040.6 and 4102, Related to Self-Assessment Process**

Dr. Oh advised that consideration of revised self-assessment forms is being handled by the Enforcement and Compounding Committee.

Dr. Oh further advised that the Board had identified a need to repeal the prior self-assessment regulation sections and had begun the process of repealing those sections through the streamlined Section 100 process, but the Office of Administrative Law determined the Board must repeal the sections through the formal rulemaking process. Dr. Oh anticipated that the Board would consider this proposed rulemaking during the next Board meeting.

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

**Amended BPC Sections 4051 and 4052, Related to Standard of Care**

Dr. Oh recalled that the Board's policy statement related to the standard of care practice model had been posted on the Board's website and conforming changes were made to the Board Member Procedure Manual. Board trainings related to HIV PEP and PrEP as well as naloxone were also removed from the website as the trainings were no longer required by law.

Dr. Oh next noted that the Board had believed the repeal of numerous regulation sections that established protocols and mandatory CE requirements could be completed through the streamlined Section 100 process, but the Office of Administrative Law determined the Board must repeal these sections through the formal rulemaking process. Dr. Oh anticipated that the Board would also consider this proposed rulemaking during the next Board meeting.

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

**Amended BPC Sections 4081 and 4105, Related to Pharmacy Records**

Dr. Oh noted the FAQs related to digitizing pharmacy records were discussed earlier in today's meeting.

**Amended BPC Section 4111, Related to Ownership Prohibitions**

Dr. Oh indicated there were no updates to report.

**Amended BPC Sections 4112, 4113, and 4113.1, Related to Nonresident Pharmacies**

Dr. Oh noted the draft policy statement regarding nonresident pharmacies was discussed earlier in today's meeting.

**Amended BPC Section 4113, Related to Pharmacist-in-charge, Staffing**

Dr. Oh indicated the Board's Pharmacist-in-Charge: Overview and Responsibilities training webinar had been updated and was available in the Board's learning management system and recommended that all pharmacists listen to the webinar.

**Amended BPC Section 4113.6, Related to Chain Community Pharmacy**

Dr. Oh recalled that the Board had approved a sample notice that chain community pharmacies could use to meet the new requirement to post

information on how to file a complaint with the Board and noted that the sample notice was available on the Board's website and released via subscriber alert.

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

**Amended BPC Section 4115, Related to Pharmacy Technicians**  
**Amended BPC Section 4200.5, Related to Retired Pharmacist License**  
**New BPC Section 4317.6, Related to Mail Order Pharmacy**  
**Amended BPC Section 4400, Related to Fees**

Dr. Oh indicated there were no new updates to report.

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

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

The Committee took a break from 10:03 a.m. to 10:30 a.m.

Roll call was taken. The following members were present via Webex; Renee Barker, Licensee Member; Jessica Crowley, Licensee Member; Claudia Mercado, Public Member; Satinder Sandhu, Licensee Member; and Seung Oh, Licensee Member. A quorum was established.

**VII. Discussion of Requirements Related to the Use of Automated Patient Dispensing Systems, Including Provisions in Business and Professions Code Sections 4427.3 and 4427.6 and California Code of Regulations, Title 16, Section 1713**

Dr. Oh advised that section 4017.3 of the Business and Professions Code defines an automated drug delivery system as a mechanical system that performs operations or activities, other than compounding or administration, relative to the storage, dispensing, or distribution of drugs. The section further defines an automated patient dispensing system, or APDS, as an ADDS for storage and dispensing of prescribed drugs directly to patients pursuant to prior authorization by a pharmacist.

Dr. Oh noted that the meeting materials described other laws and regulations, including Business and Professions Code section 4427.3, which state that an ADDS shall be placed and operated inside an enclosed building, with a

premises address, at a location approved by the Board. Section 4427.6 further provides that an APDS may be located and operated in a medical office or other location where patients are regularly seen for purposes of diagnosis and treatment, and that the APDS may only be used to dispense dangerous drugs and dangerous devices to patients of the practice.

Dr. Oh next noted that the Board has received requests for clarification on the requirements for placement and use of an APDS.

Dr. Oh requested the Committee review the item to determine if the Board should consider developing regulations to more precisely define terms such as “medical office or other location where patients are regularly seen for purposes of diagnosis and treatment” as well as to clarify which patients are eligible to receive their prescriptions from an APDS when receiving medical care through telehealth prescribers.

Dr. Oh confirmed that Committee members received the written comments on this item that were sent to the Board prior to the meeting.

Members were provided the opportunity to comment. Members discussed the requests for additional clarity and agreed that clarification via regulation is appropriate.

Members of the public participating from Sacramento were provided the opportunity to comment. The Committee heard comments in support of APDS technology that integrates telemedicine and telepharmacy into a “kiosk”, and noting that such solutions can expand pharmacy access to those who need it most. The commenter requested clarification that an APDS unit can be placed at any location where patients are regularly seen, and that this is not restricted to in-person healthcare settings.

The Committee took a break from 10:45 a.m. to 10:55 a.m.

Roll call was taken. The following members were present via Webex; Renee Barker, Licensee Member; Jessica Crowley, Licensee Member; Claudia Mercado, Public Member; Satinder Sandhu, Licensee Member; and Seung Oh, Licensee Member. A quorum was established.

The Committee heard another comment from a member of the public participating in Sacramento. The commenter expressed concern that the report on this item in the meeting materials took an overly narrow and restrictive view

on the APDS location issue, and stated that it is not good policy to limit APDS to being located only in medical offices where in-person care is being provided.

Members of the public participating via Webex were then provided the opportunity to comment. The Committee heard several comments requesting clarity on telehealth patient eligibility to use APDS, APDS location requirements, and pharmacist oversight and inspection requirements for APDS in medical offices. One commenter also noted long-standing confusion about the Board's regulatory authority over APDS-like systems operated by entities other than pharmacies, and urged the Board to clarify where its oversight applies, especially when prescriptions are dispensed by physicians rather than pharmacies. All commenters stressed that telehealth patients should receive the same access to medication via APDS as in-person patients and encouraged the Board to remove unnecessary barriers to care and maintain patient safety, while supporting modern, technology-enabled care models.

Dr. Oh noted that he saw two separate issues: (1) where can an APDS be located, and (2) which patients can access these devices. He also noted that he agreed BPC section 4427.6(j) was not clear, and that clarification through the regulatory process will take time.

Members were provided the opportunity to comment. Members noted their appreciation for the public comments. Members discussed concerns about APDS placement, security, drug storage conditions, and ensuring proper pharmacist consultation. They emphasized that not all APDS technologies are the same and suggested the need for a presentation to understand different APDS types and their current use in California. Members stressed caution when expanding APDS use, particularly for advanced dispensing machines, and highlighted the importance of maintaining sufficient pharmacist oversight and human interaction. There was also acknowledgment that telehealth patients may need equal access, but the Board must formally clarify how the statute applies before moving forward. Dr. Oh noted they will develop some regulation language for a discussion in a future meeting.

#### **VIII. Discussion of Proposal to Establish Definitions for Outpatient Pharmacies Based on Business Model**

Chairperson Oh advised that the requirements for pharmacies apply equally among a variety of business models, unless specified, which allows for broad regulation; however, it can become challenging when business models vary but the requirements do not. Dr. Oh further noted that within existing law there are

several instances where a more specific definition is referenced, but only when applying to a specific provision of the law; for example, Pharmacy Law does not currently include a general definition of “chain community pharmacy.” Rather, in specified sections of statute and regulation, the law refers to Business and Professions Code section 4001 for the definition. BPC section 4001 provides, “For the purposes of this subdivision, a ‘chain community pharmacy’ means a chain of 75 or more stores in California under the same ownership, and an ‘independent community pharmacy’ means a pharmacy owned by a person or entity who owns no more than four pharmacies in California.”

Dr. Oh recalled that during the Committee’s October 2025 meeting, the Committee considered this issue, and during the Committee’s January 2026 meeting, the Committee received presentations on three specific business models – home health services, skilled nursing facilities, and infusion center pharmacies. Dr. Oh noted the presentations highlighted the opportunity for more specific regulation if pursuing the approach of developing definitions and tailoring requirements for specific business models.

Dr. Oh indicated he had reviewed the draft definitions in the meeting materials and believed they were appropriate. Dr. Oh reminded members that the policy goal behind this effort is not to add more burdens but to streamline the Board’s regulatory approach where possible. Dr. Oh also reminded members that this applies specifically to the PHY license type.

Members were provided the opportunity to comment. Members expressed support for beginning the process of clarifying pharmacy and practice-type definitions but emphasized that significant discussion is still needed. Questions were raised about what constitutes “same ownership” for chain community pharmacies and how definitions may apply to franchise models. Several members noted inconsistencies and gaps in existing definitions, which can create regulatory burdens without improving consumer protection. Concerns were also raised about how rapidly pharmacy practice is evolving, making it difficult to create definitions that will remain accurate over time. Despite these challenges, members agreed that clearer definitions could help streamline enforcement and remove unnecessary requirements. President Oh acknowledged these concerns and committed to developing regulatory language, noting that the process will be complex and ongoing.

There were no public members in the Sacramento location. Members of the public participating via Webex were provided the opportunity to comment.

Speakers expressed appreciation for the Committee's work on defining outpatient pharmacy models and urged the Committee to keep any definitions broad and flexible to avoid limiting innovation or restricting evolving pharmacy roles. Commenters noted that pharmacy practice is rapidly changing across all settings, making overly prescriptive definitions difficult to maintain. A representative from Kaiser Permanente highlighted that managed care outpatient pharmacies operate differently from chain community pharmacies and may warrant separate consideration. A pharmacy technician suggested implementing a prescription tracking feature in hospital systems to improve discharge coordination and reduce readmissions. Additional comments cautioned the Committee to carefully review proposed terms such as "non-dispensing pharmacy," which could unintentionally require licensure for settings that do not handle medications. Speakers also noted challenges related to closed-door pharmacies, including signage and inspection expectations, and recommended that the Committee look at other states who have gone down this path already.

Members were provided the opportunity to comment having heard public comments. Members expressed appreciation for the public input and emphasized the importance of avoiding definitions that could create unintended restrictions or limit future innovation. They noted the challenge of developing definitions that remain flexible as pharmacy practice continues to evolve. Members discussed that the intent of the definitions is not to impose additional burdens but to allow certain pharmacies to be exempt from requirements that may not apply to them, based on self-identification of the services they provide. Members encouraged continued stakeholder feedback and invited additional written comments to support further discussion.

## **IX. Discussion of Licensing Statistics**

Dr. Oh noted the meeting materials included a summary of the licensing statistics for the first eight months of the fiscal year and noted that data for March was not available as of release of the meeting materials. Dr. Oh added that staff would include the licensing data for March as part of the Board meeting materials later in April.

Dr. Oh further noted processing times for the various facility business types vary and continue to fluctuate. While a few of the licensing programs are within the Board's performance targets, others exceed the 30-day target.

Dr. Oh reminded members the processing time noted in the meeting materials represented the oldest application of each type, and the average processing time is lower. Dr. Oh thanked licensing staff for working so diligently to process applications.

Dr. Oh noted that in the first eight months of the fiscal year the Board has issued 6,452 individual licenses and 501 permanent site licenses with an additional 761 temporary site licenses and further noted the numbers demonstrate how busy the Board's licensing staff remain. Dr. Oh also noted the significant increase in the number of pharmacy technician applications the Board had received.

Members were provided the opportunity to comment. Members requested insight at a future meeting on the increase in technician applications.

There were no public members in the Sacramento location. Members of the public participating via Webex were provided the opportunity to comment. A commenter noted the increase in PHY-licensed pharmacies may not necessarily indicate growth in specific categories such as chain pharmacies or dispensing pharmacies, and suggested further statistical analysis to better understand these trends, especially when considering issues like pharmacy deserts. The commenter cautioned the Committee to be careful when defining "specialty pharmacy," pointing out that other states' attempts had created complications and explained that some specialty pharmacies, such as oncology practices licensed as PHY, only dispense certain drugs, which could create access issues if definitions are too rigid.

#### **X. Advisement of Future Committee Meeting Dates**

Dr. Oh announced the next Licensing Committee meeting was currently scheduled for June 11, 2026.

#### **XI. Adjournment**

The meeting adjourned at 12:01 p.m.