



# california pharmacists association

October 19, 2020

Debbie Veale, R.Ph.  
Chair, Licensing Committee  
California Board of Pharmacy  
2720 Gateway Oaks Dr, Ste. 100  
Sacramento, CA 95833

Dear Ms. Veale,

The California Pharmacists' Association (CPhA) is respectfully submitting comments on Agenda Item VI of the Licensing Committee's report on October 20, 2020 relating to the development of a mandatory reporting requirement for schools of pharmacy to notify the Board of licensees engaged in academic dishonesty.

CPhA recently adopted new policy at our last House of Delegates meeting on September 13, 2020 regarding Professional Conduct. Our recently adopted policy states:

*"The California Pharmacists Association supports the pursuit of individual integrity, ethics, and professional conduct in academic and professional activities.*

*The California Pharmacists Association supports uniform standards for the criteria of academic integrity, ethics, and professional conduct that uphold the dignity and honor of the profession.*

*The California Pharmacists Association supports ongoing education on academic integrity, ethics, and professional standards in pharmacy curricula and post-graduate continuing education and training.*

*The California Pharmacists Association supports systems that facilitate the reporting and monitoring of violations of academic integrity, ethics, and professional standards.*

*The California Pharmacists Association supports the individual's obligation to report violations of integrity, ethics, and professional conduct, whether these violations are of one's own or their colleagues."*

We understand the Board's desire to address the issue of academic dishonesty. However, we question the Board's authority to place reporting requirements on institutes of higher learning. While the Board holds jurisdiction over intern pharmacists (students) and faculty (pharmacists) as individual licensees, it holds no jurisdiction on the operation of any school of pharmacy in California. The only jurisdiction that the Board holds is the ability to "recognize" a school of pharmacy per CCR 1719 through accreditation requirements by the Accreditation Council for Pharmacy Education (ACPE) or through some other way of 'recognition' by the Board. But the purpose of recognition is solely for the licensing of individuals, not oversight of the school.

Additionally, of the 15 schools of pharmacy in California, three are part of the University of California system, which is governed and overseen by the UC Board of Regents. This proposal could be seen as an inappropriate interference of their autonomous governance structure. CPhA would then be concerned with the potential unequal application of the mandatory reporting requirement depending on the school of pharmacy.

Rather than attempting to require the schools to report to the Board, it may want to consider a requirement of its licensees to report. CPhA would respectfully request that if the Board is seeking to propose such requirement for mandatory reporting of academic dishonesty of its licensees, it must consider the following:

- Provide a clear definition of academic dishonesty in order to remove any ambiguity.
- Have the Board conduct its own survey of students and faculty in all schools on what they consider academic dishonesty and see if it lines up with the results done on Loma Linda's survey of its own students.
- Create appropriate reporting mechanisms, procedures, and consequences for such instances of academic dishonesty.

CPhA looks forward to working with the Board on the development of this proposal. Should you have any questions about these comments, please don't hesitate to contact me at [dmartinez@cpha.com](mailto:dmartinez@cpha.com) or at (916) 779-4519. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Martinez', with a stylized flourish at the end.

Danny Martinez  
Director, Regulatory Affairs and Policy Development  
California Pharmacists Association