



# california pharmacists association

December 13, 2022

Seung Oh, President  
California Board of Pharmacy  
2720 Gateway Oaks Dr, Ste 100  
Sacramento, CA 95833

***Re: Proposed Amendment of Business & Professions Code Sec. 4113.5 Related to Pharmacy Staffing***

Dear President Oh,

The California Pharmacists Association (CPhA) appreciates the discussion and work of the Medication Error Reduction and Workforce Ad Hoc Committee since the beginning of 2022. CPhA writes in support of the proposed amendments to Business & Professions Code Sec. 4113.5 as it relates to appropriate and safe staffing of pharmacies and the autonomy of the Pharmacist in Charge (PIC) in determining safe working conditions.

As discussed in the Ad Hoc Committee meetings, there is a correlation between appropriate staffing levels and pharmacy personnel burnout leading to potential medication errors. This recommendation complements the CPhA sponsored bill in the most recent legislative cycle, SB 362 (Newman) Pharmacy Quotas, which aims to reduce the burnout with profit driven metrics and a lack of focus on patient-centered outcomes.

In addition, the following CPhA policies fully support the recommendations of the Ad Hoc Committee:

- *The California Pharmacists Association supports pharmacist and technician staffing which supports workflow without compromising patient safety.*
- *The California Pharmacists Association supports the development of policies, resources, and practices to support pharmacy personnel's safety and wellbeing in the workplace.*
- *The California Pharmacists Association supports business policies, practices, resources and staffing models that ensure patient safety*

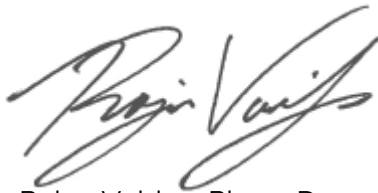
CPhA fully supports the autonomy provided to the pharmacist on duty to determine adequate staffing levels to honor their oath as a pharmacist to provide patient care services safely without fear of retaliation.

We appreciate the opportunity to comment and provide feedback to the Board to develop and effectively implement this important patient safety initiative. Should you have any questions about this recommendation, please feel free to contact me at [rvaidya@cpha.com](mailto:rvaidya@cpha.com).

Founded in 1869, the California Pharmacists Association (CPhA) is the largest statewide association representing the pharmacy profession in all practice settings. Our mission is to advance the practice of pharmacy for the promotion of health.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Rajan Vaidya". The signature is fluid and cursive, with the first name "Rajan" and last name "Vaidya" clearly distinguishable.

Rajan Vaidya, PharmD  
Vice President, Practice & Professional Development