



california pharmacists association

December 13, 2022

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

Re: Proposed Addition of Business & Professions Code Sec. 4113.1 Pharmacy Operations Related to Medication Error Reporting

Dear President Oh,

The California Pharmacists Association (CPhA) appreciates the recent discussions and research the Medication Error Reduction and Workforce Ad Hoc Committee has undertaken since the beginning of 2022. While CPhA supports the goal of reducing medication errors, we would like to share some potential concerns of mandating that medication errors be reported to one defined entity.

Although the Institute for Safe Medication Practices (ISMP) develops great resources to report and reduce medication errors, the tools and services are not universal to all pharmacy practice settings and may not be easily integrated into all pharmacy systems and workflows. Furthermore, the Agency for Healthcare Research and Quality (AHRQ), lists federally recognized Patient Safety Organizations (PSOs) that meet national standards of medication error reporting and resources to reduce errors and patient harm. Providing pharmacists and pharmacies the ability to choose the PSO and tools directly aligned with the clinical services, setting, and workflow will allow for meaningful reporting, and ultimately development of best practices to reduce medication errors.

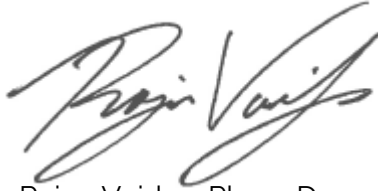
CPhA respectfully requests that the Board provide pharmacies the option to report medication error data to any federally recognized PSO. This model has worked in other states and will reduce any undue burden on a pharmacy to report and manage medication errors to ensure safer patient outcomes.

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 rvidya@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, appearing to read "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