

## **BOARD OF PHARMACY**

### **FINAL STATEMENT OF REASONS**

Hearing Date: None.

Section Affected: Title 16, Section 1732.2

#### Updated Information

The Initial Statement of Reasons is included in the file and was updated with a 15-day notice of modified text. The proposed amendment of Title 16, Section 1732.2 would allow the board to accept continuing education coursework approved by the Medical Board of California, the California Board of Podiatric Medicine, the California Board of Registered Nursing or the Dental Board of California upon completion by the pharmacist. This amendment would eliminate the required written petition to the Board of Pharmacy for such coursework. This amendment includes the above-mentioned coursework that meets the standard of relevance to the practice of pharmacy and has been approved for continuing education by the previously mentioned boards.

A public hearing was not requested nor was it scheduled. The board did not receive public comment for the 15-day comment period commencing March 14, 2003, and concluding March 28, 2003.

#### Local Mandate

A mandate is not imposed on local agencies or school districts.

#### Small Business Impact

The Board of Pharmacy has determined that the proposed regulations would affect small businesses. No alternatives were proposed to lessen such adverse economic impact on small businesses.

#### Consideration of Alternatives

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the board would be either more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed regulation.

#### Objections or Recommendations/Responses

The following comments were made regarding the proposal:

1. In an email dated November 27, 2002, John Sie, Pharm.D. offered support for the board's proposal. Dr. Sie stated that working in a group of Ambulatory Care pharmacists, he assists cardiologists in managing patients' drug therapy. In order to provide such assistance, he must attend CME programs that are not given ACPE credit. In addition, he has to attend ACPE accredited programs to satisfy his continuing education requirement for the board. Dr. Sie stated that attending disease specific symposiums or CME programs allow for better thinking processes and clinical decisions.

2. In an email dated December 5, 2002, Sharon D. Ow-Wing, Pharm.D. offered support for the board's proposal. Dr. Ow-Wing stated it would be helpful to claim hours spent at education courses provided by UCSF School of Medicine without \$40 per unit expense. Dr. Ow-Wing fully supports obtaining continuing education in specialty areas of interest.