

Board of Pharmacy Policy Statement: The Role of the Pharmacist-in-Charge

Adopted November 6, 2025

Highlight

The California State Board of Pharmacy, recognizing the vital role a pharmacist-in-charge (PIC) plays in providing safe and effective patient care services, secures additional legal changes to underscore the autonomy of PICs.

Background

Every pharmacy must designate a PIC to serve as the supervisor or manager responsible for ensuring the pharmacy's compliance with all state and federal laws and regulations pertaining to the practice of pharmacy.¹ The PIC has responsibility for the daily operation of the pharmacy, and the pharmacy owner must vest the PIC with adequate authority to assure compliance with the laws governing the operation of a pharmacy.² Courts have confirmed a "strict liability" reading of the PIC's responsibilities in certain contexts.³

The Board wishes to remind licensees and other stakeholders about the important role of the PIC, and call attention to significant legal and policy changes the Board has undertaken, in response to comments received, to address identified barriers to a PIC achieving the level of autonomy necessary to fulfill the legal and ethical obligations inherent in a PIC position.

Such changes include:

1. Updating the Board's unprofessional conduct codes to explicitly state that actions or conduct that would subvert the effort of a PIC to comply with laws and regulations, exercise professional judgment, or make determinations about adequate staffing levels to safely fill prescriptions of the pharmacy or provide other patient care services in a safe and competent manner is unprofessional conduct.⁴

¹ See Business and Professions Code (BPC) sections 4036.5 and 4113.

² See California Code of Regulations, title 16, section 1709.1.

³ See *Sternberg v. California State Bd. of Pharmacy* (2015) 239 Cal.App.4th 1159, holding that BPC section 4081, understood in combination with a PIC's responsibility for pharmacy compliance and the obligation to protect the public, did not require "knowledge" to impose discipline for violations of inventory management, such that "strict liability" is proper in this context.

⁴ See BPC section 4301(w).

2. Updating the regulations related to PIC eligibility to require completion of a Board-provided Pharmacist-in-Charge Overview and Responsibility training course prior to appointment as a PIC.⁵

Recent Changes

Under provisions of Assembly Bill 1503 (Berman, Chapter 196, Statutes of 2025) several additional changes were made to reinforce the autonomy of decision-making of a PIC. Changes include:

1. The PIC **shall** make staffing decisions to ensure sufficient personnel are present in the pharmacy to prevent fatigue, distraction, or other conditions that may interfere with a pharmacist's ability to practice competently and safely.⁶
2. The PIC, using their independent professional judgment, shall determine the appropriate pharmacist-to-technician ratio, not to exceed a maximum ratio of 1:3.⁷

In addition, based on concerns that a PIC of a nonresident pharmacy has not established minimum competency with California law yet is responsible for operational and legal compliance with California pharmacy law, AB 1503 requires that, beginning July 1, 2026, a nonresident pharmacy must identify a California-licensed pharmacist employed and working at the nonresident pharmacy to serve as the PIC.⁸ Note: The individual designated as the PIC for a nonresident pharmacy must be fully vested with all authority necessary to ensure operational compliance to meet requirements established in California law. The Board further notes that, as a policy matter, it will not require the individual designated as the PIC for California operations to be the PIC on record for the resident state.

Additional Information

BPC section 4306.6 requires the Board to consider a report made by the PIC, regarding an actual or suspected violation of pharmacy law by another person, as a mitigating factor in a disciplinary action against the PIC.

⁵ See California Code of Regulations, title 16, section 1709.1, subdivisions (a) and (e).

⁶ See Stats. 2025, Ch. 196, Sec. 33 (AB 1503), effective January 1, 2026. (**Note:** Prior to this change, BPC section 4113(c)(2) stated that the PIC **may** make staffing decisions.)

⁷ See Stats. 2025, Ch. 196, Sec. 33 and 36 (AB 1503), effective January 1, 2026.

⁸ See Stats. 2025, Ch. 196, Sec. 32 (AB 1503), effective January 1, 2026.

To assist prospective PICs of nonresident pharmacies to learn about California pharmacist licensure requirements, the Board has information available [here](#). The Board highlights that the California Practice Standards and Jurisprudence Examination is only administered on dedicated days; see the Board's [website](#) for the schedule of test dates.