



CALIFORNIA STATE BOARD OF PHARMACY

BE AWARE AND TAKE CARE: Talk to your pharmacist!

REMINDERS FOR NEW PICs

Congratulations on your appointment as the Pharmacist-in-Charge (PIC). This is an important leadership role, and the Board appreciates your commitment to ensuring safe, compliant, and effective pharmacy operations. As the PIC, you hold legal responsibility for ensuring the pharmacy's compliance with all state and federal laws and regulations pertaining to the practice of pharmacy.

This document provides some reminders to assist you as you transition into your new role. It is not, however, intended to serve as a comprehensive or all-inclusive statement of all PIC responsibilities.

Time-Sensitive PIC Responsibilities

- Complete Appropriate Self-Assessment Form

The PIC must complete the appropriate self-assessment form based on the type of license, by July 1 of every odd-numbered year and **within 30 days of any of the following**: (1) a new pharmacy license is issued, (2) a new PIC appointment, or (3) a change in the location of a pharmacy to a new address. The self-assessment is designed to help you evaluate compliance with major legal requirements and identify areas needing corrective action.

[Reference: BPC §4102](#)

- Complete Inventory Activities and Inventory Reconciliation Reports of Controlled Substances

A new PIC of a pharmacy shall complete an inventory reconciliation report for the following federal controlled substances **within 30 days of becoming PIC**:

- Federal Schedule II controlled substances

- Alprazolam, 1 milligram/unit
- Alprazolam, 2 milligrams/unit
- Tramadol, 50 milligrams/unit
- Promethazine/codeine, 6.25 milligrams of promethazine and 10 milligrams of codeine per 5 milliliters of product

[Reference: 16 CCR §1715.65](#)

Note: Refer to [16 CCR §1715.65](#) for a full understanding of the Board's requirements regarding periodic controlled substance inventory activities. Refer to the DEA Pharmacist's Manual for an overview of federal controlled substance inventory requirements. A link to the manual is provided below.

- Review Staffing Levels and Determine the Pharmacist-to-Technician Ratio
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. Further, PICs working in an outpatient pharmacy are responsible for determining the appropriate pharmacist-to-pharmacy technician ratio, not to exceed the maximum ratio established in BPC section 4115(g).

[Reference: BPC §4113](#)

Additional Recommendations

- Review and update internal policies and procedures.
- Ensure all staff are trained, licensed appropriately, and performing only duties permitted by law.
- Verify that drug procurement, storage, recordkeeping, and dispensing practices meet all regulatory standards.
- Oversee security of dangerous drugs and devices, including access controls and reporting obligations for losses or thefts.
- Review the list of pharmacy personnel authorized to order medications.
- Review the Power of Attorney to confirm which individuals are authorized to obtain and execute DEA Forms 222.

Mitigation

[BPC section 4306.6](#) requires the Board to use 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 if all of the conditions set forth in BPC section 4306.6 are met.

Resources to Assist You

[The Role of a PIC Policy Statement](#)

[Self-Assessment Forms](#)

[How to Prepare for an Inspection](#)

[Frequently Asked Questions](#)

[Compilation of California Pharmacy Law](#)

[DEA Pharmacist's Manual – An Informational Outline of the Controlled Substances Act](#)

[Got a question? Ask an Inspector](#)