December 4, 2020

Mr. Greg Lippe President California Board of Pharmacy 2720 Gateway Oaks Dr, Ste. 100 Sacramento, CA 95833

Dear Mr. Lippe,

The California Pharmacists Association (CPhA), is writing to urge the Board of Pharmacy, at the December 10 Board meeting, to extend the current waiver of Business and Professions Code 4114 related to allowing an additional intern pharmacist for each supervising pharmacist in order to perform immunizations consistent with the provisions of Pharmacy Law. Additionally, we are requesting that this waiver be modified to include two additional intern pharmacists, instead of one, so that the ratio would temporarily be 4:1 intern pharmacist to pharmacist.

As California begins to roll out its COVID-19 vaccination plan, the need to immunize an estimated 40 million Californians over the next several months is going to require an increased workforce of qualified immunizers. Whether immunizing at the pharmacy, a health fair, a grocery store, or other setting, it's clear that an appropriate number of qualified healthcare providers need to be in place.

CPhA, as a sponsor of AB 1710 (Wood), which allows pharmacists to independently immunize patients with the COVID-19 vaccine when one becomes available, fully supports temporarily allowing an increased ratio of intern pharmacists to address anticipated workforce needs when administering the COVID-19 vaccine. Intern pharmacists, through their doctor of pharmacy (PharmD) curriculum, are trained and certified immunizers. This, in turn, will create a needed supply of readily available healthcare providers without much delay.

For these reasons, CPhA supports an extension of the waiver and requests that the ratio be increased to two additional intern pharmacists. Should you have any questions about this, please don't hesitate to contact me at <a href="mailto:dmartinez@cpha.com">dmartinez@cpha.com</a> or at (916) 779-4519. Thank you.

Sincerely,

Danny Martinez

Director, Regulatory Affairs and Policy Development

California Pharamcists Association