



1413 Florence Drive, Gwynedd Valley, PA 19437

April 7, 2026

Anne Sodergren, Executive Director
California State Board of Pharmacy
2720 Gateway Oaks Drive, Suite 100, Sacramento, CA 95833

RE: PATIENT ACCESS TO AUTOMATED DRUG DELIVERY SYSTEMS AND INSPECTION REQUIREMENTS

Dear Executive Director Sodergren,

On behalf of the Convenient Care Association (CCA), I am writing to request the Board's guidance on two issues that directly affect whether patients in California can conveniently and affordably access their prescription medications. Since our founding in 2006, CCA's north star has been ensuring that all people have access to accessible, affordable, and high-quality healthcare, regardless of where they live, how they see their provider, or what barriers stand between them and the care they need. Our members, including retail health clinics, mobile health programs, and allied organizations, serve millions of patients each year in pharmacies, grocery stores, retail centers, and underserved communities nationwide.

We have learned that Board staff communications have raised questions about whether automated patient dispensing system (a type of automated drug delivery system) (APDS) kiosks at medical offices may serve patients whose prescriptions originated from telehealth visits. For patients, this distinction can mean the difference between picking up a medication conveniently at the clinic where their provider practices, or facing additional trips, delays, and barriers that undermine adherence and outcomes. A patient who chooses a virtual visit with their provider is still a patient of that practice. They still need their medication promptly. They still deserve the same convenient access as a patient who walked through the door. Our review of California statute, in particular BPC §4427.3(b)(5) and §4427.6(j), does not indicate any basis for treating these patients differently, and we believe that doing so would create an inequitable two-tiered system that harms the very patients APDS technology was designed to help. We respectfully urge the Board to make clear that patients of the practice, whether seen in person or via telehealth, may access their prescriptions through APDS kiosks at their provider's medical office.

Additionally, we ask the Board to confirm that monthly physical pharmacist inspections are not required for APDS kiosks in medical offices under BPC §4427.6(j). Board staff has indicated such inspections would be required; however, neither BPC §4427.6(j) nor the California ADDS Self-Assessment form imposes this requirement for medical office kiosks. While HSC §1261.6(h) and BPC §4119.11(h) do include monthly inspection requirements, those statutes apply only to health facilities and 340B covered entities, respectively, not to medical office settings. Imposing requirements beyond what the law requires risk reducing APDS availability, particularly in underserved communities where patients already face significant barriers to getting their medications on time.

Thank you for your consideration. CCA shares the Board's commitment to patient safety, and we believe clarity on both issues will serve patients by ensuring equitable, convenient access to their medications. We welcome the opportunity to discuss further and are happy to provide any additional information the Board may find helpful.

Kind regards,

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