

## 9/23/2026 CALIFORNIA STATE BOARD OF PHARMACY LICENSING COMMITTEE MEETING

Part of Agenda **Item V. Auxiliary Labeling**

Place at the end of Attachment #2 and will be **EXHIBIT #1**

The pictures below are of both front and back portions of labels that were actually printed in 2009 and 2010 to meet the proposed label improvements at that time. I included them today, in 2026, to show what the main portion of the label is in 12-point on both labels. RX 362347 is 12-point because there are only 4 lines of directions and RX 361325 is only 8-point showing what happens when the computer automatically adjusts the font size from 12 to 8 point when the directions provided by the physician are longer than the normal 2 to 4 lines (like corticosteroid tablets) for the directions. These were Test Labels, only for showing font sizes, darkness in print and ease in reading the directions and auxiliary portions of the label, so the Xopenex label is totally incorrect in what is stated on the label and there is no shake well, etc.

Now specifically for the auxiliary label portion of the labels below: for RX 362347 the size of the vial is small, 12.2 drams, with the auxiliary-label portion in **6-point BOLD** and for RX 361325 the size of the vial is 20 drams, with the auxiliary-label portion in **8-point BOLD** due to different sources of the contents of the auxiliary labels. As you view these labels today, both the main label and auxiliary label portions' print look very good because they are in bold print, were taped and been kept in a file cabinet for ~ 16 years so that needs to be considered.

I hope this provides some insight into the value of having at least 6-point, **if not 7-point**, as a minimum size and the value of using bold print for auxiliary labels/warnings. I also would like to have the Board consider the inclusion that any print on the label, 7-point and less, be required in bold print.

There could be concerns today about more changes to the label, but remember, the original improvements in the past have worked well and it's too bad the auxiliary labeling was left out at that time. What resulted in many cases were illegible auxiliary labeling due to small font size and darkness in print that has not been voluntarily corrected in ~16 years! All the printing on the labels below still look good for their age and given today's larger label sizes and the changes in dimensions/sizes to vials, there is even more flexibility in making these improvements work to benefit the consumer with additional safety in **100%** of the label. This added consistency, through a few more changes, will be much easier to put into place than those in 2010.



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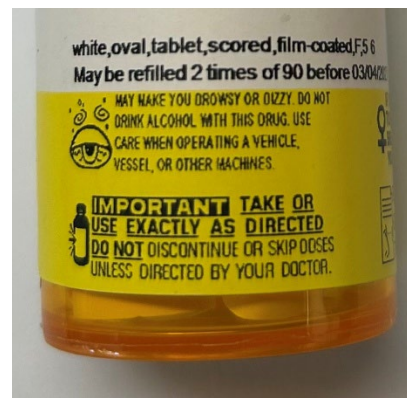
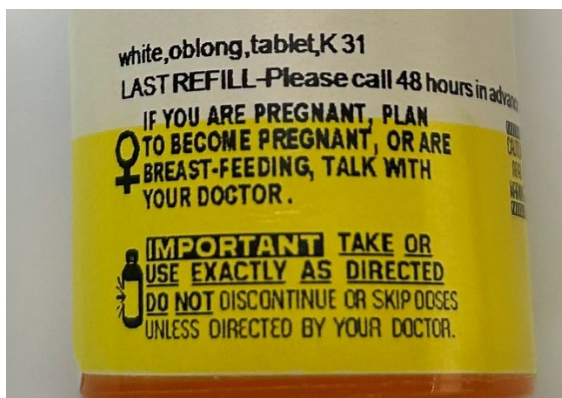
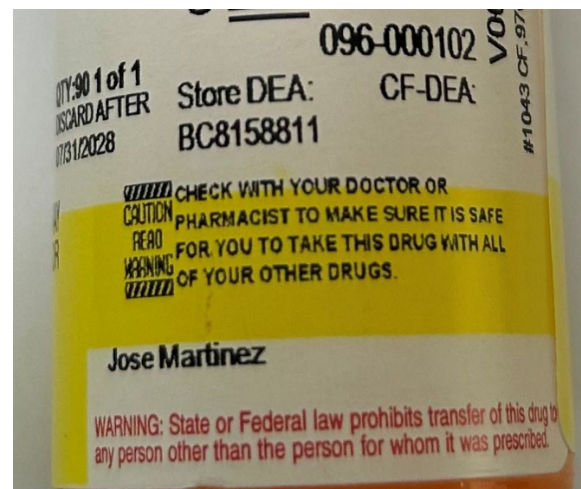
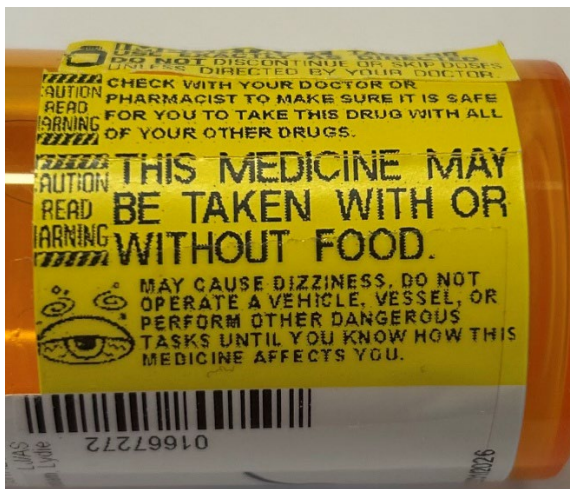
Part of Agenda **Item V. Auxiliary Labeling**  
Place at the end of Attachment #2 and will be **EXHIBIT #2**

These are pictures of labels for my actual prescriptions filled in 2026 from one of the two pharmacies I get my prescriptions filled. I only zeroed in on the auxiliary labeling portion to show the minimum font size of at least 7 possibly 8, and BOLD print throughout the label, making the labels very clear.

Additionally, the warning about transferring the prescription to another person below is clear, good font size and properly stated which adds the necessary consistency we are looking for today. It's not necessary to require red print but that's not a problem and I think a good idea if one chooses to do so.

I am not sure why the need for Jose Martinez who could be the pharmacist on duty who checked off the prescription, maybe initials would have sufficed after the actual date filled placed to the right of the patient's name on the label; the DEA Number is likely not necessary, plus the "096-000102" which could possibly have been included in the bar code adding to less clutter. Overall, this label is very good with the exceptions I mentioned in the previous sentence.

I realize our inspectors have more important issues to deal with, but during an inspection (or another representative from the Board of Pharmacy), look at a few prescriptions ready for pickup to review some of the points to see how much consistency is needed to improve the auxiliary labeling in terms of font sizes, darkness of print, location of all the pertinent dates to avoid confusion and reducing clutter from unnecessary data.



## 9/23/2026 CALIFORNIA STATE BOARD OF PHARMACY LICENSING COMMITTEE MEETING

### Part of Agenda **Item V.** Auxiliary Labeling

Place at the end of Attachment #2 and will be **EXHIBIT #3**

These are pictures of labels for my actual prescriptions filled in 2026 from the other of my two pharmacies I get my prescriptions filled. I zeroed in on the auxiliary labeling portion to point out the font size of 4 possibly 5, **NOT BOLD print**, making it difficult to read. Not only does it rub off easily due to the low level of darkness, but the smaller font size leaves less surface area to “adhere” to the label. when you couple all of these points together it is very hard to determine what date refers to what particular item. A LARGER FONT SIZE TO LIKELY 7 RATHER THAN THE 6 I INITIALLY SUGGESTED, BOLD PRINTING ON ANYTHING 7 FONT OR LESS WILL VASTLY IMPROVE THE ABILITY TO SEE AND READ THE LABEL.

As a separate comment, **UNRELATED** to the auxiliary labeling, please consider the requirement to separate the date the prescription was actually filled from the other dates on the Prescription Label. Instead of locating all three together in one column as depicted on the label below, located on the upper left (it can be confusing to see all the dates together). The date filled (in 12-point font) could be located to the right of the Patient’s Name and the original date of the prescription while the remaining refills or expiration date of refills and the expiration of the medication towards the bottom of the label, or on a different side of the label where the date actually filled appears, to help reduce confusion when that particular prescription was filled or refilled. I believe this would make it easier for the patient or caregiver to see what bottle is the current refill and know the last refill date much more easily.

