

Louisiana Board of Pharmacy

3388 Brentwood Drive Baton Rouge, Louisiana 70809-1700 Telephone 225.925.6496 ~ E-mail: info@pharmacy.la.gov



NOTICE IS HEREBY GIVEN that a Public Hearing has been ordered and called for **9:00 a.m. on Wednesday, February 26, 2025** at the Board office, for the purpose to wit:

AGENDA Revised 01-20-2025

- 1. Call to Order 9:00 a.m.
- 2. Appearances
- 3. Solicitation of Comments & Testimony on Proposed Rule Changes
 - A. Regulatory Project 2025-01 ~ Pharmacist-in-Charge (PIC) Requirements
 - B. Regulatory Project 2025-02 ~ Marijuana Pharmacy
- 4. Opportunity for Public Comment
- 5. Adjourn /2:00 p.m.

Public Comments

Interested persons may submit written comments, via United States Postal Service or other carrier, or in the alternative by personal delivery to M. Joseph Fontenot Jr., Executive Director, at the Board office. He is responsible for responding to inquiries regarding the proposed Rule amendments. The deadline for the receipt of all written comments is 12 p.m. on Wednesday, February 26, 2025.

Public Hearing

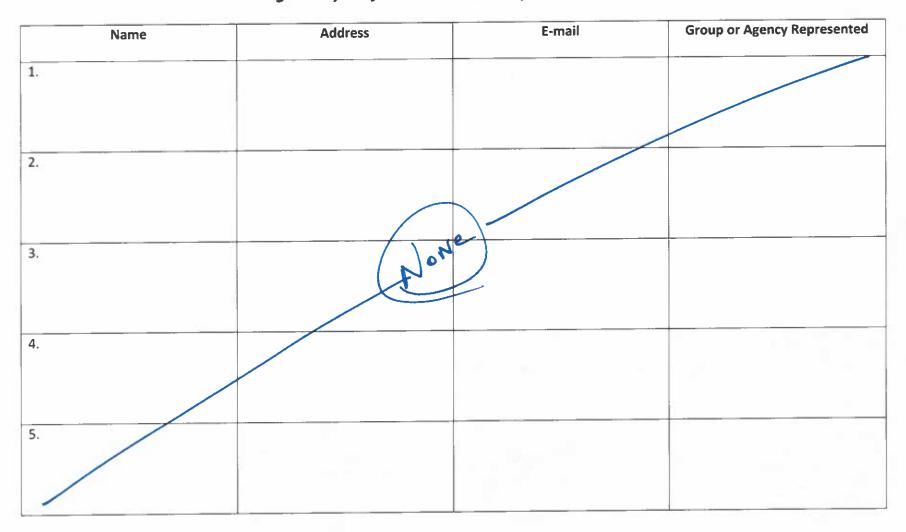
During the hearing, all interested persons will be afforded an opportunity to submit comments and testimony, either verbally or in writing. The deadline for the receipt of all comments and testimony is 12 p.m. that same day. To request a disability accommodation, please contact Joe Fontenot, Executive Director, at 225.925.6496 or email at <u>ifontenot@pharmacy.la.gov</u>.

<u>NOTICE:</u> In compliance with Act 256 of the 2019 Louisiana Legislature, the Board gives public notice that any information submitted to the Board may become public record unless specifically exempted by the Public Records Law, R.S. 44:1 *et seq.* **NOTICE:** To request a disability accommodation, please contact Joe Fontenot, Executive Director, at 225.925.6496 or email at **ifontenot@pharmacy.la.gov**

Conisiana Board of Pharmacy

Public Hearing Attendance Record ~ February 26, 2025

Regulatory Project 2025-01 ~ Pharmacist-in-Charge (PIC) Requirements Regulatory Project 2025-02 ~ Marijuana Pharmacy





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February 26, 2025

Public Hearing

Opportunity for Public Comment

lone 1. Name representing Comments:

2.	Name	representing

Comments:

3.	Name	representing
	Comments:	

4.	Name	_ representing	
	Comments:		



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Summary of Testimony & Public Comments

Regulatory Project 2025-01 ~ Pharmacist-in-Charge (PIC) Requirements at February 26, 2025 Public Hearing

1. Letter from Jessica Elliott representing Louisiana Alliance of Retail Pharmacies

Ms. Elliott expressed support for the regulatory project and noted the advancement in pharmacy education and training in recent years which better prepare pharmacist for leadership responsibilities. Ms. Elliott noted, after one year of practice many pharmacists have already developed the skills and confidence necessary to manage a pharmacy effectively and uphold patient safety.

2. Letter from Jeenu Philip representing Walgreens

Mr. Philip expressed full support for the regulatory project. Mr. Philip stated Walgreens fully endorses the principle that any pharmacist who chooses to serve as a PIC must be thoroughly trained and capable before assuming the role. Walgreens does not believe that increasing the required years of experience as a pharmacist directly correlates with the ability to successfully fulfill the PIC position, nor does it compromise patient safety or quality, provided the PIC is aware of their responsibilities and willing to serve. Additionally, Walgreens believes that reducing the prior practice experience requirement for PIC eligibility creates more opportunities for capable and willing pharmacists who may not have been previously eligible.



February 17, 2025

M. Joseph Fontenot, Jr. Louisiana Board of Pharmacy 3388 Brentwood Dr. Baton Rouge, LA 70809-1700

Re: Regulatory Project 2025-01 ~ Pharmacist-in-Charge (PIC) Requirements

Dear Mr. Fontenot,

On behalf of the member companies operating over two hundred pharmacies throughout Louisiana, the Louisiana Alliance of Retail Pharmacies (LARP) is writing to express our support for Regulatory Project 2025-01, which will allow pharmacists with one year of experience to qualify for a Pharmacist-in-Charge (PIC) position. This modification represents a progressive step that acknowledges the evolving landscape of the pharmacy profession and the preparedness of pharmacists to assume leadership roles earlier in their careers.

Pharmacy education and training have advanced significantly in recent years, equipping pharmacists with a robust foundation in clinical knowledge, management, and patient care. New graduates enter the workforce with extensive practical training from internships, advanced practice rotations, and exposure to a variety of settings, which better prepare them for leadership responsibilities. After one year of practice, many pharmacists have already developed the skills and confidence necessary to manage pharmacy operations effectively and uphold patient safety.

This rule change would also address current workforce challenges, including the shortage of qualified candidates for PIC positions in some areas. By allowing experienced pharmacists with one year of practice to assume these roles, pharmacies could better serve their communities by maintaining stable operations and consistent leadership. Additionally, this change would empower ambitious and capable pharmacists to grow professionally and contribute to the field without unnecessary delays.

Of course, maintaining rigorous standards for PIC performance is critical. Many pharmacists achieve significant milestones in their first year of practice, including developing proficiency in workflow management, regulatory compliance, team leadership, and patient care. Allowing qualified individuals with one year of experience to take on the PIC role does not compromise the safety or quality of care provided but rather aligns requirements with the demonstrated capabilities of today's pharmacists.

P.O. Box 78039 * Baton Rouge, LA * 70837 225.344.9481 LARP appreciates the opportunity to submit comments in support of this proposed rule change. If you have any questions or need additional information, please contact Jessica Elliott at <u>jessica@laretail.org</u> or 225-344-9481.

Sincerely,

Jessica Elliott

Jessica Elliott Louisiana Alliance of Retail Pharmacies



Jeenu Philip, R.Ph. Director, Pharmacy Affairs Walgreen Co. p: 904-386-6776 jeenu.philip@walgreens.com

February 21st, 2025

<u>Via Email</u>

Louisiana Board of Pharmacy Attention: M. Joseph Fontenot, Jr, Executive Director 3388 Brentwood Drive Baton Rouge, LA 70809-1700 Email: jfontenot@pharmacy.la.gov

Re: Support of Regulatory Project 2025-01 ~ Pharmacist-in-Charge (PIC) Requirements

Dear Mr. Fontenot,

On behalf of all pharmacies owned and operated by Walgreen Co. in the state of Louisiana, we express our full support for Regulatory Project 2025-01 ~ Pharmacist-in-Charge (PIC) Requirements, which reduces the minimum experience requirement for a pharmacist to serve as a PIC from two years of active pharmacy practice to one year.

Walgreens fully endorses the principle that any pharmacist who chooses to serve as a PIC must be thoroughly trained and capable before assuming the role. We do not believe that increasing the required years of experience as a pharmacist directly correlates with the ability to successfully fulfill the PIC position, nor does it compromise patient safety or quality, provided the PIC is aware of their responsibilities and willing to serve. Additionally, we believe that reducing the prior practice experience requirement for PIC eligibility creates more opportunities for capable and willing pharmacists who may not have been previously eligible.

We have identified several real-life scenarios that highlight the management and leadership skills pharmacists acquire through their pharmacy school training or other work experiences. These scenarios demonstrate that an increased minimum practice experience requirement should not be applied universally. We believe that the time spent as a pharmacist should not be the sole factor in determining readiness to serve as a PIC. Other factors to consider include:

- Pharmacists who have worked as pharmacy technicians and/or pharmacy interns prior to becoming pharmacists, gaining years of operations and people management experience.
- Pharmacists with managerial experience and demonstrated leadership skills from previous leadership positions within any organization or military service before attending pharmacy school.
- Pharmacists who have received managerial and/or leadership training through their pharmacy school curriculum, self-directed online or in-person training seminars, or from their employer.

We believe this approach allows employers to select the right person for the position based on qualifications beyond just length of employment.



We applaud the Board's efforts with this rule change and believe it is a positive step forward in addressing the workforce challenges many community pharmacies face in identifying a qualified PIC amidst a reduced applicant pool. Additionally, reducing this regulatory barrier is a significant win for capable and trained pharmacists who wish to advance their careers by serving as a PIC earlier.

Walgreens thanks the Board for the opportunity to comment and fully supports this rule change. If the Board requires additional information, please feel free to contact me.

Sincerely,

Jeenu Philip R.Ph.