Oregon Board of Pharmacy

Strategic Plan 2022-2026





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Oregon Board of Pharmacy

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# INTRODUCTION

On behalf of the board members and staff of the Oregon State Board of Pharmacy, I am pleased to present the board's Strategic Plan for 2022-2026. The purpose of this plan is to outline the direction and priorities which have been established by the board and which will ensure that pharmacy practice is regulated in the interest of public health and safety, result in exceptional service to our licensees and registrants, and advance the health of Oregonians.

Over the past two years, the board and staff have been working to implement the 2020-2024 Strategic Plan that was adopted in early 2020. Little did we know at that time, a global pandemic was beginning that would present extraordinary challenges to the public and the profession and would change pharmacy practice in significant ways. In addition, 2020 brought devastating wildfires to several areas in Oregon that further impacted the public and profession. Pharmacists, interns and technicians throughout the state have been asked to go above and beyond their already demanding roles to provide vaccinations, testing, and prescription services. The board and staff are extremely appreciative of the extraordinary professionalism and selflessness of pharmacists, interns and technicians in serving the needs of Oregonians during these public health emergencies.

We would like to acknowledge the input of stakeholders who share their views on priorities for pharmacy regulation that allows pharmacists, interns and technicians to provide the best possible care to all Oregonians. The practice of pharmacy and pharmaceutical supply chain have continued to undergo profound change due to technological advances, changes in healthcare delivery, increasing complexity in the supply chain, fragmentation of care, remote practice, social and political shifts, drug shortages, health disparities, access issues, opioid abuse, compounding and medication safety, natural disasters, and a variety of political and economic forces. We are committed to continuing to assure that pharmacy services are provided in a way that prevents healthcare disparities and to continue our affirmative action, diversity, equity and inclusion efforts in recruitment and retention of board and committee members and staff.

The five strategic goal areas outlined in this Strategic Plan will continue to guide the work of the board and staff to create the regulatory structure necessary to incorporate and encourage the best pharmacy practices to ensure public health and safety. This plan will be reviewed and updated annually to assess progress and to encourage safe and equitable delivery of pharmacy services. The five strategic goal areas include:

- Technicians
- Technology
- Licensing and Registration
- Regulation
- Communication

As we begin to implement these initiatives, we encourage continued active engagement with the board and participation in board meetings, committee meetings, rules hearings, and other board activities.

Joe Schnabel, Pharm.D., R.Ph. Executive Director

# OUR PURPOSE

## **Mission**

The Oregon Board of Pharmacy serves to promote and protect public health, safety, and welfare by ensuring high standards in the practice of pharmacy and through effective regulation of the manufacture and distribution of drugs.

## Vision

Partners for a Healthy Oregon

## Values

These values reflect both how our board and staff strive to conduct ourselves, and the behaviors we seek to instill across the practice of pharmacy in Oregon.



# PHARMACY STRATEGIC LANDSCAPE

Transformation of healthcare, pharmacy practice and society has occurred since early 2020 due to the COVID-19 pandemic. This will likely be a profoundly pivotal event in each of our lives and will have far-reaching consequences on the delivery of healthcare, pharmacy practice, and our way of life.

A variety of changes in how pharmacy services are delivered is impacting the board's regulatory activities, daily work and strategic priorities. Many of these changes offer potential benefits to the public, the pharmacy profession and health care while others pose clear risks. All, however, require careful monitoring and response from the board to ensure public safety is maintained and that licensing, regulation, enforcement and outreach efforts reflect the evolving landscape.

Some of the issues facing the Board of Pharmacy include:

**Access and distribution:** The COVID-19 pandemic has demonstrated the value of Pharmacists, Interns, Certified Oregon Pharmacy Technicians and Pharmacy Technicians as the most accessible healthcare professionals able to deliver essential services, such as vaccinations, testing, and therapeutics.

*Economic and social impacts:* The economics of pharmacy along with pharmacists and pharmacy technicians leaving the profession has resulted in challenges for the public seeking pharmacy services. Pharmacies have been closing and staff have been resigning in numbers that are impacting access to pharmacy services, particularly in rural Oregon.

**Regulatory trends:** The move to remote practice and telework has impacted pharmacy service models and regulation. Improvements in technology and the need to assure equitable access to pharmacy services for all Oregonians has necessitated new regulatory approaches. The board supports such rule changes when they result in improved access, efficiency, and protection of the public health, safety and welfare.

# STRATEGIC PRIORITIES

At its Strategic Planning meeting in November 2021, the board, executive director and the staff leadership team identified and evaluated a wide range of trends and challenges facing the practice of pharmacy and our agency. This process and deliberation led to agreement that the five critical Strategic Areas of focus identified in 2019 will remain the same for the 2022-2026 period and upon which the board's attention and resources will be focused.

#### **TECHNICIANS**

**Goal:** Articulate the regulatory structure where the accountabilities of pharmacists and the role of pharmacy technicians are aligned to enhance safety, access, service and efficiency

#### TECHNOLOGY

**Goal:** Articulate the regulatory structure where the accountabilities of pharmacists and the use of technology are aligned to enhance safety, access, service and efficiency

#### LICENSING and REGISTRATION

**Goal:** Clarify licensing and registration categories to promote appropriate professional licensure and drug outlet registration

#### REGULATION

**Goal:** Systematically refresh rules and standardize the rule development approach to improve clarity, compliance, and longevity

#### COMMUNICATION

**Goal:** Improve and maintain stakeholder and public engagement through proactive communication strategies

The board indicated that meaningful progress has been made in each goal area and additional work remains to be completed over the next two to four years. We will regularly assess progress and refine our goals and resource commitments as we work to achieve these key objectives.

The board met in November 2022 to review and revise the Strategic Plan. Recommended updates have been added to this document.

# TECHNICIANS

### Goal: Articulate the regulatory structure where the accountabilities of pharmacists and the role of pharmacy technicians are aligned to enhance safety, access, service and efficiency

The board seeks to develop clear rules to ensure that pharmacists understand their legal scope of practice and their accountability to provide patient care services and safe pharmacy practices. Rules permitting pharmacists to more fully and effectively utilize technician support must be structured to improve safety, access and patient care services.

The board seeks rule alignment to clearly describe the role of pharmacy technicians and how they assist the pharmacist in the practice of pharmacy. Regulatory structures developed for technician roles should delineate requirements for training, quality assurance, and pharmacist supervision.

### **Key Actions:**

- 1. Revise rules to make Pharmacy Technician (PT) license renewable indefinitely and remove five-year waiting period for reapplication of lapsed PT licenses.
- 2. Review technician licensing and training rules to remove barriers to licensure for those wishing to become licensed and renew their license.
- 3. Evaluate the impact of a single, renewable Pharmacy Technician license.
- 4. Evaluate role of national certification as a requirement for licensure and assess those functions in the assistance of the practice of pharmacy for which national certification would enhance public health and safety.
- 5. Review and assess applicable statutes for the development of rules that clearly articulate the responsibilities of a pharmacist and functions that only a pharmacist may perform.

### **Outcome Conditions:**

- Adoption of revised rules for Certified Oregon Pharmacy Technician and Pharmacy Technician licensure.
- Adoption of revised rules for Certified Oregon Pharmacy Technician and Pharmacy Technician training.
- Adoption of revised rules for pharmacist supervision, direction and control of Certified Oregon Pharmacy Technician and Pharmacy Technicians.
- Evaluation and board decision on the role of national certification in the licensing process.
- Enhanced capacity for pharmacist provision of patient care services while maintaining safety in dispensing services.

# TECHNOLOGY

Goal: Articulate the regulatory structure where the accountabilities of pharmacists and the use of technology are aligned to enhance safety, access, service and efficiency

The board seeks to develop clear rules to ensure that pharmacists understand their scope of practice and their accountability to provide patient care services and safe pharmacy practices while permitting the use of technologies that improve safety, access, service and efficiency. Regulatory structures developed for use of technology should be function-based and delineate pharmacist and drug outlet accountabilities for each critical stage of automated processes.

## **Key Actions:**

- 1. Implement Remote Dispensing Site Pharmacy (RDSP) rules and amend them as more is learned from experiences of Pharmacists, Certified Oregon Pharmacy Technicians, Pharmacy Technicians and the public about their effectiveness at maintaining public health and safety while improving access to pharmacy services.
- Draft and adopt rules for Pharmacy Prescription Lockers (PPL). Amend the PPL rules as more is learned from experiences of pharmacists, technicians, and the public about their effectiveness at maintaining public health and safety while improving access to medications and supplies.
- 3. Draft and adopt rules for kiosks. Amend the kiosk rules as more is learned from experiences of pharmacists, technicians, and the public about their effectiveness at maintaining public health and safety while improving access to medications and supplies.
- 4. Amend Remote Dispensing Machine (RDM) and Remote Distribution Facility (RDF) rules to align with RDSP and PPL rules.

## **Outcome Conditions:**

- Number of RDSPs registered in Oregon each year.
- Compliance cases involving RDSPs and their affiliated pharmacies.
- Number of PPLs registered in Oregon each year.
- Compliance cases involving PPLs and their affiliated pharmacies.
- Draft rules for board consideration that clearly delineate the use of new technology and pharmacist accountabilities in the practice of pharmacy.
- Defined accountabilities for each critical step in automated processes.
- Enhanced capacity for pharmacist provision of patient care services while maintaining safety in dispensing services.
- Effective quality assurance plan applied to all automated pharmacy processes.

# LICENSING and REGISTRATION

# Goal: Clarify licensing and registration categories to promote appropriate professional licensure and drug outlet registration

The board promotes patient safety through appropriate licensing and registration of all licensees and drug outlets engaged in the practice of pharmacy or assistance in the practice of pharmacy and in the manufacture, dispensing, delivery or distribution of drugs, devices and supplies. License and registration categories should clearly guide applicants to the appropriate license type.

## **Key Actions:**

- 1. Review technician licensing and training rules to remove barriers to licensure for those wishing to become licensed and renew their license.
- 2. Create and implement a consistent, ongoing process to evaluate applicable statutes for each drug outlet registration type and develop rules that clearly outline the appropriate registration type for each outlet.
- 3. Evaluate legislative and budgetary considerations that may be required to implement changes to drug outlet registration types.

### **Outcome Conditions:**

- Draft rules for board consideration that clarify the appropriate registration type for each drug outlet.
- Decrease in questions from applicants regarding appropriate registration type for which to apply.

# REGULATION

# Goal: Systematically refresh rules and standardize rule development to improve clarity, compliance, and longevity

The board proactively reviews and updates rules to provide clear expectations to licensees and registrants to promote compliance and patient safety. Rule updates should emphasize clarity, compliance, and longevity that allows practice variation that improves safety, access, service and efficiency.

## **Key Actions:**

- 1. Identify and complete process for submitting a legislative concept for board to compel licensees to undergo substance use disorder evaluation for compliance cases involving substance use.
- 2. Update Continuing Pharmacy Education rules to create clear expectations that guide licensees in professional development that improves their ability to safely engage in contemporary pharmacy practice.
- 3. Evaluate current state of pharmacy practice in Oregon and convene Safe Pharmacy Practice Conditions workgroup to develop rules to assure that clearly outline requirements for safe pharmacy practice in all pharmacy settings.
- 4. Create standard procedures and schedule to accomplish five-year rule review that emphasizes clarity and durability.
- 5. Conduct routine, scheduled, and systematic review of Board of Pharmacy rules by Division and draft revisions for board consideration.
- 6. Develop rules to ensure consistency with the Drug Supply Chain Security Act.\*
- 7. Amend rules for drug compounding to ensure consistency with updated USP chapters <795> and <797>.\*

## **Outcome Conditions:**

- Legislative concept submitted for substance use disorder evaluations for 2023 legislative session.
- Improved compliance rate with Continuing Education audits and reduce resources used to conduct such audits.
- Improved safe pharmacy practice conditions in all pharmacy settings and reduced licensee and public complaints regarding pharmacy practice conditions and services.
- At least four divisions are reviewed, updated and presented to board for consideration annually.
- Rules consistent with Federal DSCSA and current USP standards.\*

#### \* Added during November 2022 Strategic Plan review

# COMMUNICATION

# Goal: Improve and maintain stakeholder and public engagement through proactive communication strategies

The board communicates through multiple platforms to collaborate, educate, promote patient safety and enhance consumer protection.

## **Key Actions:**

- 1. Execute the agency's communication plan at all levels to improve access to relevant information and encourage stakeholder engagement.
- 2. Utilize public records request process to respond to inquiries for agency records and provide training to agency staff to respond in compliance to state law.
- 3. Continue regular outreach to stakeholder groups, including schools and colleges of pharmacy, pharmacy associations, and the public.
- 4. Utilize analytics from agency website and listserv platform to improve agency communications.
- 5. Staff to explore methods to provide useful legal information to licensees and registrants to facilitate compliance with statutes and rules.\*

## **Outcome Conditions:**

- Modern materials for agency communications, including branding and plain language used for presentations and other public documents.
- Agency website updated and maintained to provide current information and focused content, including forms and reference documents.
- Information available to licensees and registrants that facilitates compliance with statutes and rules.\*

#### \* Added during November 2022 Strategic Plan review