

December 12, 2016

Representative Daniel Hawkins
Chair, 2016 Special Committee on Organization of Public Health Boards
Kansas State Capitol
300 SW 10<sup>th</sup> Street
Room 521-E, Seat 7
Topeka, KS 66612

## RE: Opposition Letter to the Proposed Merging of the Kansas Board of Pharmacy into the Umbrella Board of Public Health

## Dear Chairman Hawkins:

On behalf of ASHP (American Society of Health-System Pharmacists), I am writing to express our concern over the proposed merging of the Kansas Board of Pharmacy into an umbrella Board of Public Health. ASHP believes that an independent board of pharmacy is critical to ensure that practice pharmacy is properly supervised and is in the best interest of patients. We urge the Kansas Board of Pharmacy to advocate remaining an independent regulatory body.

ASHP represents pharmacists who serve as patient care providers in acute and ambulatory settings. The organization's more than 43,000 members include pharmacists, student pharmacists and pharmacy technicians. For over 70 years, ASHP has been at the forefront of efforts to improve medication use and enhance patient safety.

ASHP supports an independent state board of pharmacy in Kansas, and states and territories across the United States. The mission of the Kansas Board of Pharmacy is "to protect the public's health, safety and welfare and promote the education and understanding of pharmacy related practices." We are concerned that combining health professional boards into one umbrella organization could have a negative impact on public health and safety.

Among the services an independent board of pharmacy performs are licensure, compliance, inspection and discipline. For example, state boards provide oversight of sterile compounding practices and perform inspections of pharmacies who prepare sterile products. Boards of pharmacy are uniquely positioned to provide these critical oversight services as they have the expertise and in-depth knowledge of pharmacy practice. Proper oversight helps ensure that sterile compounding practices are being followed in accordance with state law, and that compounded medications administered to patients are safe.

Another valuable service provided by state boards is setting training and education requirements around the clinical roles pharmacists play in healthcare. Pharmacists graduating today receive doctor of pharmacy degree and often complete post residency training to gain additional patient care experience.

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As training of health professionals becomes more specialized, the need for oversight by those with the knowledge and skills necessary to provide effective oversight and set meaningful standards has also increased. It is for these reasons that ASHP urges you to oppose the proposal for merging the board of pharmacy under an umbrella board of public health. We believe that the Kansas Board of Pharmacy should remain an independent regulatory body.

I appreciate the opportunity to provide these comments as the Board reviews this important issue. If you have any questions regarding this letter, or if we can be of any assistance, please do not hesitate to contact Nicholas Gentile at ngentile@ashp.org or 301-664-8687.

Sincerely,

Joseph M. Hill

Director, Government Relations

American Society of Health-System Pharmacists

Encl.