

December 6, 2021

Caroline D. Juran
Executive Director
Virginia Board of Pharmacy
9960 Mayand Drive, Suite 300
Henrico, VA 23233

RE: AMENDMENTS TO 18VAC110-20-25– UNPROFESSIONAL CONDUCT

Dear Ms. Juran,

I am writing to you on behalf of the National Community Pharmacists Association regarding proposed amendments to **18VAC110-20-25. UNPROFESSIONAL CONDUCT**. NCPA commends the Virginia Board of Pharmacy in addressing the issues of workplace safety that have resulted in documented public safety concerns. The amendments proposed by the Regulation Committee within the state's Board of Pharmacy seek to promote healthier work environment and more efficient operations.

NCPA represents the interest of America's community pharmacists, including the owners of more than 21,000 independent community pharmacies across the United States and 328 independent community pharmacies in Virginia that employ over 3,000 full-time employees who filled over 18.8 million prescriptions last year. Our members are small business owners who are among America's most accessible health care providers in many communities.

Increased workload and reports of burnout, even before the COVID-19 pandemic, have been associated with medication and dispensing errors. Regulators auditing pharmacies in Oklahoma found understaffed facilities, employees working around unopened delivery boxes and discovered that a specific pharmacy was up to two weeks behind on filling prescriptions because of inadequate staffing.¹ The state's Board of Pharmacy recommended increased training for technicians and removing some required metrics along with other tasks that could over burden the staff. Missouri's Board of Pharmacy is forming a taskforce on workplace conditions, including staffing, prescription volumes, this being a response to reports of pharmacists and staff feeling pressured to meet metrics and not having adequate time to complete tasks.² Virginia is no different from Oklahoma and Missouri, which is why it is incumbent on this Board to make all the proposed amendments available for public comment. There must be further examination and discussion on this issue as the Board must do its due diligence as the state's pharmacists can engage the governing body.

Over the past two years, pharmacists in Virginia and across the country have had to respond to a greater workload and have risen to the occasion by delivering quality services that may not have been accessed by the public due to capacity limits and

¹ Ellen Gabler *CVS Fined for Prescription Errors and Poor Staffing at Pharmacies* New York Times, July 16, 2020, available at <https://www.nytimes.com/2020/07/16/business/cvs-pharmacies-oklahoma.html>

² Annika Merrilees *Missouri board to investigate working conditions at pharmacies after hundreds complain* St. Louis Post-Dispatch, July 3, 2020, available at https://www.stltoday.com/business/local/missouri-board-to-investigate-working-conditions-at-pharmacies-after-hundreds-complain/article_7a872c83-93a6-58d3-bd26-097ffefdbfa5.html

spacing restrictions. As the demand has increased for pharmacy services and care, it is imperative that pharmacy staff are protected so they can deliver the highest quality of care possible. The Virginia Board of Pharmacy ensures that pharmacists can operate to their full scope of practice but that is not possible they are not granted the proper tools and guidance that raise standards of care and promotes patient safety. As this pandemic persists and demand of pharmacy services continue it is critical that safeguards are put in place assist pharmacists and pharmacies to practice and operate to the best of their ability.

NCPA appreciates the opportunity to provide comments supportive of the proposed amendments that promote quality patient care by defining unacceptable conduct in administering pharmacy services. We welcome the Board of Pharmacy's approach of encouraging acceptable working conditions and urge that all amendments proposed by the board's Regulation Committee be available for a 30-day public comment.

The amendments maintains accountability within the practice of pharmacy and better protects patients when providing care and other services. If you have any questions, please do not hesitate to contact me at belawoe.akwakoku@ncpa.org.

Sincerely,



Belawoe Akwakoku
State Government Affairs Manager
National Community Pharmacists Association

Cc: Virginia Board of Pharmacy