



TEXAS DEPARTMENT OF STATE HEALTH SERVICES

KIRK COLE
INTERIM COMMISSIONER

P.O. Box 149347
Austin, Texas 78714-9347
1-888-963-7111
TTY: 1-800-735-2989
www.dshs.state.tx.us

October 21, 2015

Gay Dodson, R.Ph., Executive Director and Secretary
Texas State Board of Pharmacy
William P. Hobby Building, Suite 3-600
333 Guadalupe Street
Austin, Texas 78701

Dear Ms. Dodson:

Thank you for your September 25, 2015 letter requesting input from the Department of State Health Services (Department) into the Texas State Board of Pharmacy's (Board) strategic planning process. We value our working relationship with the Board and our mutual desire to protect the public health of Texans.

In developing your long-term strategic plan for fiscal years 2017 through 2021, the Department recommends the Board consider measures to increase the safety of sterile drug products compounded by pharmacies. Additionally, the Department recommends the Board consider opportunities for cross-agency collaboration in areas such as: electronic tracking of prescription drugs from manufacturer to patient under the new federal Drug Supply Chain Security Act; diversion control of prescription drugs from normal channels of distribution, including the prevention, detection and investigation of diverted pharmaceuticals from pharmacies; donation of unused medications; and proper disposal of unused medications at pharmacy locations and elsewhere. Finally, the Department recommends the Board consider joint activities that would serve to further our common public health goals, such as: conducting joint inspections and joint training of inspection staff where appropriate; and assessing areas of overlapping jurisdiction and concerns through informal joint meetings.

I look forward to our continued efforts to ensure consumers receive safe and effective drug products. Karen Tannert, R.Ph., M.P.H., with the Drugs and Medical Devices Group is available to provide additional information or answer any questions you might have at (512) 834-6755 or via e-mail at Karen.Tannert@dshs.state.tx.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Kirk Cole".

Kirk Cole
Interim Commissioner



TEXAS SOCIETY OF HEALTH-SYSTEM PHARMACISTS
3000 JOE DIMAGGIO #30-A, ROUND ROCK, TX 78665-3994
800-242-8747 • FAX 512-852-8514 • WWW.TSHP.ORG • TSHP@TSHP.ORG

October 14, 2015

Gay Dodson, R.Ph.
Executive Director
Texas State Board of Pharmacy
333 Guadalupe Street
Austin, TX 78701

Re: TSBP 2017-2021 Strategic Plan

Dear Gay:

The Texas Society of Health-System Pharmacists (TSHP) represents the pharmacists, pharmacy residents, pharmacy technicians and pharmacy students who practice in a variety of health-system facilities. We polled our membership asking for comments for the provided questions. Below is a summary of the comments received which are submitting to the Board to take into consideration as part of your development of the 2017-2021 TSBP Strategic Plan.

1. *As the agency updates its Strategic Plan, what are the issues in general, and specifically in health care, which will affect the practice of pharmacy and the regulation of the practice, about which the agency should be concerned?*
 - a. USP standards for IV compounding. There needs to be a better balance between benefit of the standards relative to the resources needed to comply. We need to protect our patient's safety but not take steps backwards tying pharmacists to minimally beneficially additional validation steps when they could have greater patient benefit optimizing clinical care.
 - b. Pharmacist provider initiatives. The evolution of the practice of pharmacy in non-distributive roles will undoubtedly continue. With the increase in ambulatory care services, an aging population and provider shortage forecasts, the pharmacy profession can and should bridge those projected gaps in preventative and primary care to improve access to care, medication adherence, safe use of medications and overall health.
 - c. Transition of the DPS Prescription Access in Texas program. Transitioning this program to the Board with the projected changes and enhancements will significantly impact the profession's ability to monitor and control overutilization of narcotics.
 - d. Non-pharmacist dispensing of pharmaceuticals. We believe some level of pharmacist oversight should be maintained to ensure patient safety. TSBP should continue to evaluate new forms of pharmacy licenses that would allow pharmacist dispensing and over-site in unique practice settings.
 - e. Specialty medications. There has been an increasing trend of new and existing medications being classified as a specialty medication with limited distribution resulting in several hospital pharmacies being unable to purchase these medications.
 - f. Pharmacist workforce. We continue to see additional Schools and Colleges of Pharmacy open within Texas and across the nation. While not specifically a Board regulated issue, maintaining an awareness of the pharmacist workforce is important
 - g. PTCB 2020 initiative. The 2020 initiative needs to be evaluated by the Board to determine the impact on Texas' pharmacy technician workforce.
2. *How will any of these issues affect the agency's ability to carry out its mission?*

All of the above issues in one way or another affect the Board's ability to carry out its mission to protect patient safety in the state of Texas. TSBP should continue to expand patient safety through the use of pharmacy licensure and over-site in all possible areas.

3. *Which of these issues poses the greatest challenge for the agency in its ability to respond, and why?*

All issues pose unique challenges to the Board, but the pharmacist provider initiative may pose the greatest challenge as the success and implementation of this initiative relies heavily on outside stakeholders, not just the Board and profession itself. Pharmacist provider initiative will allow TSBP to expand the definition of pharmacist activities and the types of care over-seen by TSBP. New federal regulations such as USP 800 and 797 revisions offer an opportunity for TSBP to continue to enhance patient safety in the health-systems of Texas but present a challenge of balancing that increased safety with health-system operational ability. TSHP stands willing and able to support and help TSBP in this area of future challenges. The control substance monitoring program will offer challenges to TSBP staffing and implementation of the program. TSHP supports TSBP taking the program over and looks forward to the long term success despite the short term challenges.

4. *How should the agency attempt to respond to these issues and challenges?*

Continue to work with constituents to gather information broadly (as you are now) to fully vet issues and stay relevant while fulfilling your mission. It is in the best interest of the patient care for TSBP to continue to work through these issues and challenges. The expansions of TSBP roles and responsibilities in these areas will have long term benefits for not only the patients in Texas and the profession of pharmacy.

5. *What do you see as the greatest opportunity for the agency?*

Short term, the greatest opportunity already in motion is the transition of the DPS Prescription Access in Texas program over to the Board. Long term, working side-by-side with the profession to evolve the practice of pharmacy through the provider initiative has to be the greatest opportunity for the Board at this time. Improving patient access to care, safe medication use and medication adherence along with chronic disease management has the greatest potential to impact the mission of the Board to "promote, preserve and protect the public health, safety and welfare". Need to add something about TSHP supporting and helping and this would be good.

6. *What can this Board do to establish or maintain a position of strength for both the profession and the agency?*

- a. Continue to be the exemplary state agency respected by healthcare providers, legislators and the citizens of Texas.
- b. Embrace opportunities to promote the mission of the Board and the practice of pharmacy, when applicable, to increase public awareness of our role in the healthcare arena.
- c. Continue to push the profession and participants to expand the role of pharmacy and TSBP in the care of patients.
- d. Continue to involve TSHP as a trusted advisor in regards to health-system issues and challenges.

We believe that these ideas will assist the agency in maintaining its leadership on a state and national level within the regulatory field and assist in assuring the patients of Texas pharmacists receive the best possible care.

Gay, we thank you for the opportunity to submit our thoughts and want you to know that the Texas Society of Health-System Pharmacists is supportive of the efforts of the Texas State Board of Pharmacy. If there is anything that we can do to assist you or the Board in developing your Strategic Plan please let us know.

Sincerely,



Shane Greene, Pharm.D., BCPS
President



Sidney Phillips, Pharm.D., R.Ph.
President-Elect

Link to the

TEXAS STATE BOARD OF PHARMACY STRATEGIC PLAN

For the Fiscal Years 2015-2019

http://www.pharmacy.texas.gov/files_pdf/Strategic_Plan_FY_2015_2019.pdf

Link to the

**TEXAS STATE BOARD OF PHARMACY'S
SELF-EVALUATION REPORT
TO THE SUNSET ADVISORY COMMISSION**

<https://www.sunset.texas.gov/public/uploads/files/reports/Pharmacy%20Board%20Self%20Evaluation%20Report.pdf>