

Pennsylvania Pharmacists Association

Health Policy Manual

Last Updated: April 23, 2026

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Prescription Drug Abuse and Diversion/Controlled Substances

Fair Employment Practices for the Impaired/Recovered Pharmacist

The Pennsylvania Pharmacists Association (PPA) endorses referrals for pharmacists and pharmacy interns who may be impaired to entities recognized by the Board of Pharmacy (i.e. SARPH) for assessment and where so indicated, referral to evidence-based treatment and monitoring of compliance with treatment plans.

The Pennsylvania Pharmacists Association supports employment retention of pharmacists and pharmacy students who are compliant with treatment plans monitored by Board recognized entities.

The Pennsylvania Pharmacist Association further supports the hiring of pharmacists and pharmacy interns who have been endorsed by Board recognized entities (i.e. SARPH) as being able to safely return to the practice of pharmacy.

(07/11/1985) (04/12/2007) (05/10/2012) (04/27/2017) (07/12/2022)

Good Samaritan Laws

The Pennsylvania Pharmacists Association (PPA) supports Pennsylvania's concept and enactment of "Good Samaritan" laws to provide protection from criminal and/or civil liability to anyone who renders emergency care or treatment for persons in distress.

The PPA supports ongoing efforts to broaden the existing interpretation of the "Good Samaritan" laws to extend to protection from criminal, civil, and/or administrative immunity for the provision of any reasonable life-saving measures.

(05/08/2014) (9/20/2019) (revised 06/05/2025)

Medical Marijuana

The Pennsylvania Pharmacists Association (PPA) affirms that pharmacists should be involved in the safe and appropriate use of medical cannabis through engagement in public education, research, patient care activities, and the development of laws, regulations, and policies.

The PPA affirms that pharmacists should be involved in public education and research regarding non-medical use of cannabis.

(05/14/2015) (07/14/2020) (revised 06/05/2025)

Research of Schedule I Drugs

The Pennsylvania Pharmacists Association (PPA) asserts that qualified researchers or institutions should be able to design and execute scientifically sound investigations concerning the safety and efficacy of Schedule 1 drugs.

(05/14/2015) (07/14/2020) (06/05/2025)

Security and Integrity of the Prescription Process

The Pennsylvania Pharmacists Association (PPA) encourages prescribers, health systems, pharmacies, institutions, vendors, and other stakeholders to develop systems and processes to ensure security,

integrity, and accountability of the entire prescription process including manufacturing, distribution, prescribing, and dispensing of testing, medication, or other products and services.

(01/12/1980) (02/09/2008) (07/29/2013) (05/11/2018) (revised 09/23/2024)

Cybersecurity and Continuity of Care

The Pennsylvania Pharmacists Association (PPA) supports development, implementation, and maintenance of cybersecurity systems, safeguards, and response mechanisms to mitigate risk and minimize harm or disruption of care in the event of a cybersecurity incident.

(09/23/2024)

Third-Party Administration of Overdose Prevention Medication

The Pennsylvania Pharmacists Association (PPA) supports ongoing third party (i.e. family members, facilities, etc.) access to any therapies that have been deemed safe and effective for third-party administration in the event of opioid-induced respiratory depression.

The PPA maintains that the third party should be adequately trained and counseled regarding appropriate use and administration of opioid-reversal agents.

The PPA strongly asserts that both prescriber and pharmacist should not be held liable for improper use or administration of opioid-reversal agents by the third party.

(05/08/2014) (9/20/2019) (revised 06/05/2025)

Patient Care and Public Health

Active Promotion of Patient Adherence

The Pennsylvania Pharmacists Association (PPA) shall encourage its members, to actively promote medication adherence with their patients. Pharmacists are uniquely positioned to identify barriers to adherence and provide solutions to improve patient health outcomes.

(01/13/1979) (07/20/2007) (05/10/2012) (04/28/2017) (7/12/2022)

Basic Life Support (BLS) Certification

The Pennsylvania Pharmacists Association (PPA) encourages all pharmacy team members to become certified in BLS and to maintain their certification through renewal courses as required.

(07/18/1992) (06/06/2008) (07/29/2013) (05/11/2018) (revised 09/23/2024)

Continuing Professional Development

The Pennsylvania Pharmacists Association (PPA) supports professional development, a self-directed, individualized, systematic approach to life-long learning, to support pharmacist's efforts to maintain professional competence in their practice.

(12/01/2016) (12/8/2020)

Pharmacist Access to Electronic Medical and Electronic Health Records

The Pennsylvania Pharmacists Association (PPA) advocates for pharmacists across all practice settings to have lawful access to view and contribute to interoperable health care records such as Electronic

Medical Records (EMR), Electronic Health Records (EHR)/Personal Health Records (PHR), public health registries, and/or other patient healthcare information to enhance patient safety, improve the quality and efficiency of patient care, and reduce overall healthcare costs.

(02/11/2007) (07/26/2012) (04/28/2017) (revised 12/01/2022)

Pharmacist Collaboration in Development of Electronic Medical and Electronic Health Records

The Pennsylvania Pharmacists Association (PPA) strongly supports the establishment of secure, interoperable electronic health care records, including but not limited to, electronic medical and health records, and public health registries.

PPA advocates for the inclusion of pharmacists in any initiative charged with the development, enhancement, and/or implementation of electronic health information technologies and systems.

(04/28/2017) (revised 12/01/2022)

Patient Autonomy

The Pennsylvania Pharmacists Association (PPA) supports patients' ability to freely and privately make healthcare decisions for themselves in partnership with their healthcare team including, but not limited to, decisions regarding reproductive health.

The Pennsylvania Pharmacists Association will provide expertise to the public, the profession, and policymakers regarding the impact that any state or federal policy proposal may have on health inequities, including access to FDA-approved/authorized medications, and patients' right to autonomy and privacy within the commonwealth.

The Pennsylvania Pharmacists Association opposes state and federal law that limit patients' right to autonomy in healthcare decision making.

(12/01/2022)

Healthcare Provider Protection with Conflicting State/Federal Directives

The Pennsylvania Pharmacists Association (PPA) advocates for clear legal and professional guidance regarding a pharmacist's provision of healthcare services when federal and state directives conflict and/or Pennsylvania state directives conflict with those from other states. Additionally, PPA calls for liability protections if a pharmacist's responsibility to use professional judgement is limited by state or federal laws.

(12/01/2022)

Pharmacists Right of Conscientious Refusal

The Pennsylvania Pharmacists Association (PPA) recognizes a patient's right to access legally prescribed therapy while supporting the individual's pharmacist's right to exercise conscientious refusal. The PPA encourages the development of operational guidelines that facilitate the pharmacist's ability to exercise their right of conscientious refusal, while balancing the patient's right to obtain legally prescribed medications. Included in these guidelines is the position that any pharmacist making such a claim of conscience or who states an intention to make such a claim of conscience, should not be denied employment for this reason.

(08/04/2005) (11/21/2013) (05/11/2018) (06/13/2023)

Pharmacy Representation on Board and Committees Concerned with Any Phase of Public Health

The Pennsylvania Pharmacists Association (PPA) encourages and supports pharmacist representation on all appropriate federal, state, or local health boards, medical boards, healthcare teams, committees, and departments concerned with pharmacy, medicine, public health, health equity, team-based care, or the health of communities served.

(07/08/1974) (12/04/2008) (07/29/2013) (05/11/2018) (revised 09/23/2024)

Recognition of Pharmacists as Health Care Providers

The Pennsylvania Pharmacists Association (PPA) strongly supports that pharmacists be recognized in state and federal statute, regulation, and practice as health care providers.

PPA will support recognition and appropriate compensation for pharmacists as providers by advocating for parity of pharmacists with other health care providers in interactions with payers, including contracting, credentialing, and billing for services provided within the standards of practice of the profession of pharmacy.

PPA will actively communicate with and provide guidance to government agencies and payers to ensure their understanding of specific considerations and standards of practice for pharmacists as providers.

(01/23/1999) (06/06/2008) (07/29/2013) (05/11/2018) (revised 06/05/2025)

Tobacco Products and Pharmacists

It is the policy of the Pennsylvania Pharmacists Association (PPA) to support efforts to curb the use of tobacco products and oppose the sale of tobacco products, particularly in pharmacies. PPA supports and encourages pharmacists' involvement in and compensation for provision of tobacco cessation services.

(12/04/2008) (01/26/2014) (9/20/2019) (revised 06/05/2025)

The Use and Sale of Electronic Cigarettes (E-Cigarettes)

The Pennsylvania Pharmacists Association (PPA) opposes the sale of e-cigarettes and other vaporized nicotine products in pharmacies until such time that scientific data support the health and environmental safety of these products.

PPA opposes the use of e-cigarettes and other vaporized nicotine products in areas subject to current clean air laws, regulations, and policies for combustible tobacco products until such time that scientific data support the health and environmental safety of these products.

PPA urges pharmacists to become more knowledgeable about e-cigarettes and other vaporized nicotine products.

(06/05/2025)

Intimate Partner Violence

The Pennsylvania Pharmacists Association (PPA) supports public health approaches which promote

collaborative relationships amongst pharmacy teams and community partners to provide safety to those experiencing intimate partner violence (IPV).

PPA calls for pharmacy team members to support persons experiencing IPV, including by providing resources, understanding health consequences associated with IPV, and referring persons who experience IPV to additional medical treatment and services when necessary.

PPA promotes the inclusion of model curricula on IPV into pharmacy school education and continuing professional development.

(10/16/2025)

Pharmacy Practice

Ability of Qualified Pharmacy Interns to Administer Injectable Medications, Biologicals, and Immunizations

The Pennsylvania Pharmacists Association (PPA) supports allowing licensed pharmacy interns, who have completed a certificate training program, delivered by a nationally accredited provider or state-approved program, to administer medications, biologicals and immunizations under the direct supervision of a qualified pharmacist or other qualified healthcare professional.

(05/09/2013) (05/11/2018) (revised 09/23/2024)

Ability of Qualified Pharmacy Technicians to Administer Vaccines

The Pennsylvania Pharmacists Association (PPA) supports the participation by trained pharmacy technicians in vaccine administration.

The Pennsylvania Pharmacists Association supports immunizing pharmacists' individual discretion in delegating immunization administration to pharmacy technicians with the requisite education, training, and experience.

(09/23/2024)

Compounding

The Pennsylvania Pharmacists Association (PPA) supports that all licensed pharmacists be allowed to compound medications, as appropriate, to satisfy the medical needs of a particular patient and in compliance with current laws, regulations, and professional standards of practice. We fully support efforts to help improve and enhance pharmacy compounding and patients' access to quality health care.

(11/30/2007) (07/26/2012) (04/27/2017) (revised 12/01/2022)

Internet Pharmacies

The Pennsylvania Pharmacists Association (PPA) endorses the Digital Pharmacy Accreditation Program (formerly the Verified Internet Pharmacy Practice Sites™ (VIPPS®) program), developed by the National Association of Boards of Pharmacy, that is used to identify those online pharmacy practice sites that are appropriately licensed, are legitimately operating via the Internet, and that have successfully completed

a rigorous criteria review and inspection through a seal of approval. PPA further opposes the operation of internet pharmacies that do not meet these standards.

(05/19/2016) (12/8/2020)

Marketing

The practice of pharmacy is defined in PA as the provision of health care services by a pharmacist; therefore the Pennsylvania Pharmacists Association (PPA) is opposed to marketing which portrays pharmacies exclusively as a distributor of a drug product and/or diminishes the professional role of the pharmacist. PPA believes the profession's marketing should be based on accuracy and the value of the service, care, and expertise that a pharmacist provides.

(09/22/2011) (12/01/2016) (07/15/2021)

Medication Errors

The Pennsylvania Pharmacists Association (PPA) urges that organizations and governmental agencies adopt a non-punitive, system-based approach to medication errors which fosters a Just Culture of reporting and transparency, including confidential, non-retaliatory reporting of errors and safety concerns, emphasizing shared accountability for identifying and addressing systems-level contributing factors versus attributing blame to any one individual. PPA expects that organizations will take a proactive approach to medication safety based on regular review of events and near-misses, using learnings to inform short- and long-term medication error reduction plans, including updating processes, to close safety gaps related to medication distribution and management.

PPA encourages organizations to provide support of healthcare professionals as second victims and the development of programs and resources to assist individual practitioners following an error.

(7/12/2022)

Role of the State Board of Pharmacy

The Pennsylvania Pharmacists Association (PPA) affirms the role of the State Board of Pharmacy is to protect the health, welfare and safety of the citizens of the Commonwealth, and to ensure access to appropriate and safely provided medication and pharmacist-provided and/or pharmacy-provided services.

(09/23/2024)

State Board of Pharmacy Member Makeup

The Pennsylvania Pharmacists Association (PPA) endorses the philosophy that the State Board of Pharmacy shall be representative of the profession of pharmacy within the Commonwealth in terms of practice setting and people.

PPA supports the inclusion of a pharmacy technician seat on the State Board of Pharmacy.

PPA advocates for amendments to state legislation governing Board makeup and function to ensure the Board is best equipped to represent the profession and advance patient care.

(09/23/2024)

Nominees for State Board of Pharmacy

The Pennsylvania Pharmacists Association (PPA) affirms its role in recommending a qualified and committed member for any open, applicable seat on the State Board of Pharmacy to the Governor to be considered for appointment.

The PPA affirms its ability to offer comment on a potential candidate for a public member seat on the State Board of Pharmacy.

(01/19/1997) (09/28/2008) (07/29/2013) (06/26/2018) (revised 09/23/2024)

Pharmacists to Ensure Pharmaceutical Care Standards of Pharmacies in the Commonwealth

The Pennsylvania Pharmacists Association (PPA) supports that only Pennsylvania licensed pharmacists should be permitted to ensure that pharmacies in the Commonwealth of Pennsylvania uphold the standards of pharmaceutical care according to the laws and regulations of the Commonwealth.

(07/08/1974) (05/07/2009) (05/08/2014) (9/20/2019) (revised 06/05/2025)

Supervision of Pharmacy Technicians

The Pennsylvania Pharmacists Association (PPA) recognizes that pharmacy technicians provide an important service under the supervision of the pharmacist and that they are an integral part of the pharmacy team. Regardless of the practice setting, it is the responsibility of the pharmacist to supervise the technician(s) properly and adequately in their duties and defined roles. The pharmacy permit holder has a corresponding responsibility to ensure the appropriate supervision of technicians.

(07/14/2020) (1/20/2026)

Pharmacy Technician Training

The Pennsylvania Pharmacists Association that pharmacy technicians should receive adequate training to understand and perform their expected duties. Pharmacists should encourage and support certification of technicians through an approved certification training program and to pursue opportunities to further their education and develop their skills.

(07/14/2020) (1/20/2026)

Pharmacy Technician Registration

The Pennsylvania Pharmacists Association (PPA) believes that it is appropriate to require statewide registration of pharmacy technicians as a means for tracking and monitoring individuals hired to perform technician duties. Registration should include timely proof of a criminal background check having been completed.

(07/14/2020) (1/20/2026)

Telepharmacy

The Pennsylvania Pharmacists Association (PPA) encourages the development of standards for the practice of Telepharmacy affecting the Commonwealth that balance expanding patient access to pharmacy services while maintaining appropriate pharmacist supervision of the dispensing and medication management processes to ensure that quality of care, medication safety, and pharmacist-

patient relationships are not compromised. PPA further encourages continued research to identify Telepharmacy best practices to shape law and regulation in this area. PPA's expectation is that the same quality-level of care must be provided and all standards of practice must be adhered to when practicing via Telepharmacy.

(07/14/2020)

Protecting Critical Patient Access to Pharmacies and Pharmacy Teams

The Pennsylvania Pharmacists Association (PPA) supports the formal designation of community pharmacies as "Critical Access Provider Protection" Recipients within Pennsylvania's healthcare infrastructure and calls for immediate action by the Pennsylvania Governor, legislature, board of pharmacy, public health department, and Insurance Commissioner to sustain local public access to medications and pharmacist-provided patient care services.

PPA advocates for the modernization of state and federal regulations that impede the ability of community pharmacies and pharmacy teams to provide timely and safe access to medications and services, including reforms to reimbursement models, prior authorization processes, scope-of-practice limitations, and removal of policies that prevent patients from accessing pharmacies within their communities that can meet their individualized patient care needs.

PPA urges the Pennsylvania Department of Health, Board of Pharmacy and other relevant agencies to implement safeguards against the closure of community pharmacies in critical access zones (i.e. keystone pharmacies), including financial stabilization programs, emergency relief funding, and workforce support initiatives.

PPA supports policies that integrate community pharmacies into broader healthcare continuity of care, including electronic health record interoperability, collaborative practice agreements, and care transition protocols.

PPA recommends the establishment of a statewide pharmacy access monitoring system and review board to identify service gaps, track pharmacy closures, and inform and recommend to the governor responsive policy interventions aimed at preserving patient continuity of care and timely, safe access to medications and pharmacist-provided patient care services, and sustainability of community-based pharmacies, local employers, and wellbeing of pharmacy team members.

(10/16/2025)

Pharmacist Engagement in Professional Meetings and Access to Evidence-Based Information

PPA supports the right of pharmacy personnels to attend meetings to enhance their knowledge, understanding and delivery of evidence-based patient care, without restrictions or penalty from employers or government agencies.

PPA supports the right of pharmacy personnels to participate in professional organizations, including expressing their own personal policy views, participating in organizational governance, and presenting

evidence-based information without restrictions or penalty from employers or government agencies.

PPA encourages the timely availability and utilization of evidence-based health information to support the delivery and coverage of patient care services, whether from a government or credible professional organization.

PPA encourages the ongoing reinforcement of skills related to the evaluation of published studies, articles, and recommendations related to patient care through continuing professional development.
(1/20/2026)

Prescription Drugs

Non-Discriminatory Drug Pricing for Pharmacies

The Pennsylvania Pharmacists Association (PPA) opposes discriminatory drug product pricing towards pharmacies in Pennsylvania.

(03/11/1993) (02/09/2008) (11/21/2013) (06/26/2018) (revised 09/23/2024)

Drug Importation

The Pennsylvania Pharmacists Association (PPA) believes that a pharmaceutical drug importation program for the routine import of prescription drugs increases the risk of adulteration, puts unnecessary strain on the global drug supply chain, requires complicated oversight & regulation, and likely would result in confusion for Pennsylvanian patients & clinicians alike, all the while not addressing the core issues driving high drug prices. There may be situations (ex., a critical drug shortage) where the benefits of a pharmaceutical drug importation program clearly outweigh the risks – in these situations, the association will support the position that provides the most benefit and least risk to patients and healthcare professionals within the Commonwealth.

(05/19/2016) (revised 12/02/2021)

Generic Drugs

The Commonwealth of Pennsylvania modify the current Generic Equivalent Drug Law - Act of 1990, P.L. 509 No.121 as follows:

Allow Pharmacists to substitute a generically equivalent drug "A rated" & listed in the Food and Drug Administration's most current copy of the "Orange Book" for a prescribed brand drug unless indicated by the prescriber or requested otherwise by the patient.

Allow Pharmacists to substitute one manufacturer of a generic equivalent, "A rated" for another manufacture of the same generic equivalent "A rated" on an additional dispensing of a prescription without contacting the prescriber.

Move the administration and enforcement of generic substitution to the Board of Pharmacy from the Department of Health.

(11/30/2007) (05/10/2012) (11/30/2017)

Generic Substitution

The Pennsylvania Pharmacists Association (PPA) supports the following changes to the Pennsylvania Generic Equivalent Drug Law to support the exercise of pharmacists' professional judgment and efficiency in handling generic drug product substitution, ensuring patients' timely access to affordable medications.

1. Allowing pharmacists to make the following substitutions based on their professional judgment and in the best interest of patient care without prescriber notification or approval, unless otherwise expressly indicated by the prescriber or requested by the patient:
 - a. an "A rated" generic drug, as listed in the Food and Drug Administration (FDA)'s "Orange Book," for a prescribed brand drug.
2. an "A rated" generic drug for another manufacturer's "A rated" generic of the same reference drug. Allowing pharmacists to make the above substitutions on subsequent, as well as initial, fills of prescriptions based on their professional judgment and in the best interest of patient care (e.g. determining any special considerations when change of manufacturer is needed for balancing considerations such as narrow-therapeutic index drugs and drug shortages).
3. Moving the administration and enforcement of generic substitution to the Board of Pharmacy from the Department of Health.

PPA also encourages developers of dispensing systems, electronic medical records/electronic health records (EMR/EHR), and related health technologies to facilitate appropriate generic substitution, such as by incorporating Orange Book designations into substitution fields.

(09/23/2024)

Biological Product Substitution

The Pennsylvania Pharmacists Association (PPA) supports the following changes to the Pennsylvania Generic Equivalent Drug Law to support the exercise of pharmacists' professional judgment and efficiency in handling biological product substitution, ensuring patients' timely access to affordable medications.

1. Allowing pharmacists based on their professional judgment and in the best interest of patient care to make the following substitutions without prescriber notification or approval, unless otherwise expressly indicated by the prescriber or requested by the patient:
 - a. an interchangeable biological product, as listed in the FDA's "Purple Book," for a prescribed biological product.
 - b. one interchangeable biological product for another interchangeable biological product of the same reference biological product.
2. Allowing pharmacists to make the above substitutions on subsequent, as well as initial, fills of prescriptions based on their professional judgment and in the best interest of patient care.
3. Moving the administration and enforcement of biological product substitution to the Board of Pharmacy from the Department of Health.

PPA also encourages developers of dispensing systems, electronic medical records/electronic health records (EMR/EHR), and related health technologies to facilitate appropriate biological product

substitution, such as by incorporating Purple Book designations into substitution fields.
(09/23/2024)

Reference: Purple Book Background – <https://www.fda.gov/drugs/biosimilars/background-information-list-licensed-biological-products-reference-product-exclusivity-and>

Tablet Splitting

The Pennsylvania Pharmacists Association (PPA) believes tablet-splitting should be conducted according to a pharmacist’s professional judgment based on a specific patient’s circumstances (dosing needs vs. commercially-available formulations, affordability, dexterity, difficulty swallowing, health literacy, need for adherence support, etc.). Pharmacists should consider FDA, ISMP, USP <800>, drug schedule (e.g. controlled substances) and other relevant guidance in determining whether, and how, dosage forms should be split. This should include documenting tablet-splitting decisions to ensure consistent dispensing and counseling patients on, and verifying their understanding of, directions for administration. Payers should compensate pharmacy teams for the time required for tablet-splitting and counseling when splitting is deemed necessary.

Background:

- FDA Best Practices: <https://www.fda.gov/drugs/ensuring-safe-use-medicine/bestpractices-tablet-splitting>
- ISMP Do Not Crush List: <https://www.ismp.org/recommendations/do-not-crush>
- ISMP Article: <https://www.ismp.org/resources/tablet-splitting-do-it-only-if-you-half-and-then-do-it-safely>

(09/11/2023)

Specialty Pharmacy

Biosimilars

The Pennsylvania Pharmacists Association (PPA) encourages state legislators to follow the standards and guidance as set by the Food and Drug Administration regarding safe and effective biosimilar development, utilization and dispensing.

The dispensing of FDA approved biosimilars should be conducted in a manner that ensures access while avoiding unnecessary and redundant barriers for patients, providers, and payers.

(05/09/2013) (06/26/2018)

Restricted Drug Distribution System

The Pennsylvania Pharmacists Association (PPA) opposes the routine practice of shipping or dispensing medications via Brown Bagging and White Bagging. Collectively, these practices involve shipping non self-administered injectables, primarily from a specialty pharmacy, directly to the provider or to the patient’s custody. These practices circumvent safety and sourcing protocols that may impact product integrity. Patients and providers must take on more care coordination, risking care delays while

navigating new drug acquisition and handling responsibilities. Ultimately, the ability to provide safe, timely and accessible care is impacted. When appropriate, PPA supports clear bagging practices which allow a coordinated effort between a specialty pharmacy and provider, often under shared common ownership, to coordinate distribution of clinic administered medications.

(12/1/2016) (revised 12/02/2021)

Payer/Insurance

Open Access / Patient Choice of Pharmacy & Pharmacist

The Pennsylvania Pharmacists Association (PPA) believes that patients should have access to the pharmacy and pharmacist of their choice, free of mandates or incentives, or other mechanisms that restrict the freedom of the patient to choose.

(12/02/2021)

Payment for Dispensing

The Pennsylvania Pharmacists Association (PPA) strongly asserts that pharmacies should be compensated fairly for the process of dispensing medications. Fair compensation for dispensing medications should appropriately consider factors including, but not limited to, the actual acquisition cost of medication by the pharmacy, necessary operating expenses, compensation for the professional expertise provided by the pharmacist and care provided by the pharmacy and a reasonable profit. Compensation for dispensing medications should be clear and transparent to all parties involved, at all times.

(12/02/2021)

Pharmacist Payment for Non-Dispensing Services

The Pennsylvania Pharmacists Association (PPA) strongly asserts that pharmacists improve quality and provide value and therefore should be fairly compensated for professional and clinical services that are within their scope of practice. PPA will advocate for pharmacists to be fairly compensated for professional and clinical services that are within their scope of practice and which are paid for when performed by a physician, an advanced practice registered nurse, a physician assistant, etc.

(12/02/21) (7/12/2022)

Pharmacies Payment for Non-Dispensing Services

The Pennsylvania Pharmacists Association (PPA) strongly asserts that pharmacies serve to improve quality and provide value and therefore should be fairly compensated for the provision of professional and clinical services that are aligned with improving elements of the quadruple aim (as defined by the Agency for Healthcare Research and Quality).

(12/02/2021)

Fair Audit Practice

The Pennsylvania Pharmacists Association (PPA) supports fair audit guidelines to ensure pharmacy audits are conducted efficiently with minimal disruption to practice and focus on the detection of fraud, waste,

and abuse. These include, but are not limited to providing adequate (e.g. 30 days) advance written notice for an audit, providing the specific records requested – and the rationale – in advance, limiting the time period covered by the audit, and requiring that audits be conducted only by Commonwealth-licensed pharmacists without payment incentives based on amount recovered. A complete written review of all audited prescriptions should be provided to the pharmacy at the end of every audit.

Neither clerical nor recordkeeping errors, nor patient administration errors affecting days' supply, should be considered fraud and subject to recoupment. If recoupment is deemed to be necessary on a prescription where the correct medication was dispensed to a patient for legitimate medical use, the amount of the recoupment should be limited to the professional dispensing fee paid to the pharmacy. Recoupments should not be subject to statistical extrapolation.

(01/12/1980) (07/09/2009) (11/20/2014) (9/20/2019) (revised 12/01/2022)

Opposition to Any Tax on Prescriptions

The Pennsylvania Pharmacists Association (PPA) opposes any tax which would apply to any prescription or nonprescription medicines, other healthcare products, or health-related services, regardless of form of payment.

(01/17/1992) (12/04/2008) (07/29/2013) (06/26/2018) (revised 06/05/2025)

Prescribers and Other Healthcare Practitioners

Inclusion of Diagnosis on Prescriptions

The Pennsylvania Pharmacists Association (PPA) supports the inclusion of diagnosis on prescriptions for the improvement of patient care.

(02/05/2005) (04/28/2011) (11/19/2015) (07/14/2020)

Physician Dispensing

The Pennsylvania Pharmacists Association (PPA) upholds that prescribers should not engage in dispensing drug products to patients or caregivers. Pharmacists are uniquely trained to provide a prospective drug review pursuant to prescriptions being adjudicated. Checks and balances in the health care system are put in place to protect the health and welfare of the patient; to bypass the pharmacist has the potential to negatively impact patient outcomes.

(05/08/2014) (07/14/2020)

Workplace Conditions

The Pennsylvania Pharmacists Association (PPA) endorses the American Pharmacists Association's "2023 Workplace Conditions" policy. Specifically, PPA

1. calls for employers to provide fair, realistic, and equitable workplace conditions for pharmacy personnel that promote a safe, healthy, and sustainable working environment;
2. urges all entities that impact pharmacy personnel workplace conditions to adopt the [Pharmacists' Fundamental Responsibilities and Rights](#);
3. urges employers to develop and empower pharmacy personnel to use flexible practice management models based on available staffing, expertise, and resources that balance

workloads to minimize distractions;

4. advocates for employers to provide workplace onboarding and training for pharmacy personnel to optimize employee performance and satisfaction;
5. encourages pharmacy personnel, starting with leaders, to model and facilitate individualized healthy working behaviors that improve well-being and to encourage and empower colleagues to do the same;
6. opposes the sole use of productivity and fiscal measures for employee performance evaluations; and
7. calls for employers and employees to collaborate in the development and use of behavioral performance competencies in performance evaluations.

Background:

- Policies Adopted by the 2023 House of Delegates:
<https://www.pharmacist.com/About/Leadership/HOD/2023Policy-Updates>
- Pharmacist's Fundamental Responsibilities And Rights:
<https://www.pharmacist.com/pharmacistsresponsibilities>

(09/11/2023)

APPENDIX

Standards of Practice

I. PROFESSIONAL COMPETENCE:

- A. The Pharmacist shall utilize his expertise in assuring the optimal use of therapeutic.
- B. The Pharmacist shall utilize his expertise in selection and/or preparation of therapeutic agents.
- C. The Pharmacist shall participate in interprofessional activities to improve health care.
- D. The Pharmacist shall use his expertise to improve public and individual health in his community.
- E. The Pharmacist shall maintain his professional competence through the available means of continuing education.
- F. The Pharmacist shall not promote through public communication any professionally selflaudatory statements calculated to attract patients.
- G. The Pharmacist shall maintain an extensive and up-to-date drug information library adequate to provide optimal professional services.
- H. The Pharmacist shall be an active member of county, state, and national pharmacy organizations.
- I. The Pharmacist must meet his professional and legal responsibilities.

II. PROFESSIONAL SERVICES:

- A. The Pharmacist has the responsibility of monitoring the patient's therapy.
- B. The Pharmacist shall maintain surveillance of patient drug usage to maximize compliance and minimize misuse.
- C. The Pharmacist shall maintain and utilize a system of medication records for his patient.
- D. The Pharmacist shall provide information and consultation to assure proper drug utilization.
- E. The Pharmacist shall participate in the education of the pharmacy student.
- F. The Pharmacist shall encourage young people to enter health care professions.