



September 11, 2026

Brianna Fujimoto
Board of Pharmacy
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PharmacyRulemaking@dca.ca.gov

Subject: Comments on Proposed Amendments to 16 CCR §1749 Fee Schedule

Dear President Oh and Members of the Board:

On behalf of the California Society of Health-System Pharmacists (CSHP), representing pharmacists practicing in hospitals, health systems, clinics, and integrated care environments throughout California, we appreciate the opportunity to provide comments regarding the Board of Pharmacy's proposed amendments to Section 1749 of Title 16 of the California Code of Regulations concerning Board fee schedules.

CSHP strongly supports the Board's fundamental responsibility to protect the public and recognizes that fulfilling this responsibility requires adequate and sustainable resources. Effective licensing, enforcement, inspections, investigations, disciplinary activities, implementation of new laws and regulations, and other public protection functions require appropriate personnel, technology, infrastructure, and administrative support. We therefore recognize that maintaining the Board's ability to fulfill its statutory responsibilities may necessitate periodic adjustments to licensing and regulatory fees.

At the same time, the environment in which the Board operates continues to change. New legislation and regulations may expand or alter the Board's responsibilities, create new oversight requirements, or require specialized expertise and additional staff resources. Conversely, changes within the pharmacy marketplace—including pharmacy closures and reductions or shifts in certain categories of licensed entities—may affect both Board revenues and the volume and nature of the regulatory workload.

Given these changing conditions, CSHP believes it is important that proposed fee adjustments be supported by an understanding of the Board's current and projected responsibilities and the

resources necessary to carry them out. This should include consideration of anticipated workload associated with new laws and regulations, licensing and inspection responsibilities, enforcement activities, and other statutory obligations, as well as changes in the number and types of entities subject to Board oversight.

We would therefore appreciate greater clarity regarding the foundation for future proposed fee increases and how the Board has projected its future resource requirements. In particular, it would be helpful for stakeholders to understand how projected staffing and operational needs have been evaluated in relation to changes in regulatory responsibilities, workload, and the number and types of licensees regulated by the Board.

As part of this assessment, CSHP also encourages consideration of opportunities for operational efficiencies. Advances in technology, automation, digital licensing and renewal processes, data analytics, risk-based approaches to oversight, and other process improvements may provide opportunities to improve efficiency while maintaining—or enhancing—the Board’s public protection responsibilities. Consideration of such opportunities is consistent with responsible stewardship of the resources provided by California’s licensees.

We recognize that operational efficiencies will not necessarily eliminate the need for fee increases. Indeed, the Board may determine that additional resources are necessary to appropriately carry out its responsibilities, particularly as the regulatory environment becomes increasingly complex. Where that is the case, providing stakeholders with a clear connection between regulatory responsibilities, workload, necessary resources, anticipated efficiencies, and the resulting fee structure would strengthen understanding of the proposed adjustments.

We also encourage the Board to consider the cumulative financial environment facing California pharmacies and pharmacy practice. Pharmacy closures, reimbursement pressures, workforce costs, technology requirements, and expanding regulatory obligations continue to affect the sustainability of pharmacy services. While regulatory fees represent only one component of these costs, consideration of their cumulative impact is important, particularly as California seeks to maintain patient access to pharmacy services.

In summary, CSHP supports ensuring that the California State Board of Pharmacy has the resources necessary to fulfill its critical public protection mission. We recognize that appropriate resourcing—including adequate personnel, technology, and infrastructure—may require adjustments to the Board’s fee structure. We encourage the Board, in determining the appropriate level of those adjustments, to clearly articulate the relationship between its evolving regulatory responsibilities, projected workload, changes in the regulated community, necessary staffing and operational resources, and opportunities for greater operational efficiency.

Such an approach would provide a strong and transparent foundation for determining the resources and fee structure necessary to support the Board’s public protection responsibilities now and into the future.

Thank you for the opportunity to provide these comments and for the Board's continued commitment to protecting the health and safety of Californians.

Respectfully,

A handwritten signature in black ink, reading "Loriann De Martini". The signature is fluid and cursive, with the first name "Loriann" and last name "De Martini" clearly distinguishable.

Loriann De Martini, PharmD, BCGP, MPH

Chief Executive Officer

California Society of Health-System Pharmacists