

May 1, 2020

The Honorable Gavin Newsom State of California, Governor State Capitol Building, First Floor Sacramento, California 95814

RE: Authorizing Pharmacists to Order and Administer COVID-19 Tests to Expand Capacity

Dear Governor Newsom:

The California Society of Health-System Pharmacists (CSHP) respectfully requests that you issue an Executive Order authorizing pharmacist in California to order and administer COVID-19 tests during this public health crisis. Doing so will rapidly and safely expand California's COVID-19 testing capacity by leveraging our highly trained professional pharmacy workforce.

On April 14, 2020, your office released six indicators that would help guide California's transition out of the current statewide shelter-in-place order. The first indicator is to monitor and protect communities through testing, contact tracing, isolating, and supporting those who are positive or exposed. California pharmacists are extremely well suited to rapidly and safely expand our state's testing capacity and help California achieve this indicator. In fact, on April 8, the federal Department of Health and Human Services (HHS) issued Guidance under the Public Readiness and Emergency Preparedness Act authorizing licensed pharmacists to order and administer FDA-approved COVID-19 tests.

The HHS guidance is clear: pharmacists, in partnership with other healthcare providers, are well positioned to aid COVID-19 testing expansion. Pharmacists are trusted healthcare professionals with established relationships with their patients. The vast majority of Americans live close to a retail or independent community-based pharmacy. That proximity reduces travel to testing locations, which is an important mitigation measure. Pharmacists also have strong relationships with medical providers and hospitals to appropriately refer patients when necessary.

Unfortunately, despite the HHS guidance referenced above, the California Department of Public Health (CDPH) has recently indicated that pharmacists are not permitted to order or administer COVID-19 tests, citing roadblocks in current California state law. In many respects, California has led the nation by empowering its pharmacy profession to meet the needs of our communities. However, there are several states ahead of us that have already acted to directly authorize pharmacists to order and administer COVID-19 tests, including New York, Florida, Illinois, Kentucky and Pennsylvania. We believe California can and should do the same.

There are over 47,000 pharmacists practicing in over 6,500 pharmacies throughout California who are already directly authorized to offer an array of critical public health

services, such as the ability to prescribe and offer vaccines, hormonal contraception, nicotine replacement services, travel medications, and opioid antagonist medication. Additionally, pharmacists are often one of the few or only advanced practice health care professionals that are accessible to people living in many rural or underserved communities. This makes us the ideal profession to democratize testing access across the state.

The pharmacy profession stands ready to meet this moment and help our state safely and rapidly expand its COVID-19 testing capacity. We urge your Administration to adopt an Executive Order to allow pharmacists to order and administer COVI9-19 tests as quickly as is practicable. We would be happy to meet to discuss this matter further or answer any questions you or your staff may have.

Sincerely,

Loriann DeMartini, PharmD, MPH, BCGP

Chief Executive Office

California Society of Health System Pharmacists

Founded in 1962, CSHP represents thousands of pharmacy professionals across California who serve patients and the public through the promotion of wellness, patient safety and the optimal use of medications. CSHP members practice in a variety of organized healthcare settings – including, but not limited to, hospitals, integrated health systems clinics, ambulatory care settings, retail settings and home healthcare settings.