



April 9, 2026

California State Board of Pharmacy
Attn: Lori Martinez
2720 Gateway Oaks Drive, Suite 100
Sacramento, CA 95833

Via Email: PharmacyRulemaking@dca.ca.gov

Re: Followup Comments to Staff Responses and Recommendations for Central Fill Pharmacies

To California State Board of Pharmacy Members and Executive Officer Sodgren,

The California Retailers Association appreciates the California Board of Pharmacy's continued work on the Central Fill Pharmacies rulemaking, and we are encouraged by the addition of subsection (e), the allowance for electronic patient notification, and the controlled substances provision. These changes reflect a commitment to preserving flexible pharmacy models.

We write to raise two concerns that remain unclear in the modified text.

1. The "located in California" requirement is inconsistent with AB 1503 (Berman – 2025) Board of Pharmacy Sunset review.

The Modified Initial Statement of Reasons states that the "located in California" requirement is necessary because "the Board must be able to inspect central fill facilities, which requires that the facilities be located within California." However, AB 1503 expressly provides that "the board *may* inspect a nonresident pharmacy licensed pursuant to this section." The Board already has inspection authority over California-licensed nonresident pharmacies. The stated rationale for the geographic restriction therefore does not hold, and we respectfully request that the Board reconcile this inconsistency.

2. In-State Requirements Fail to Account for Geographic and Patient Realities

The Modified Initial Statement of Reasons further states that an in-state requirement is needed "to avoid any potential delays in therapy." This is not always accurate. A patient in Redlands, California, for example, is geographically closer to a central fill pharmacy in Phoenix, Arizona than to one in Sacramento, California. Limiting central fill to in-state locations can create access barriers — particularly for Limited Distribution Drugs and patients in underserved or rural communities — rather than eliminating them.

Recommended Revisions

1. Remove the in-state location requirement.

We recommend removing "located in California and" from subsection (c), as this language is inconsistent with the AB 1503 and creates unnecessary access barriers as described above:

§ 1707.4(c) — A central fill pharmacy ~~located in California and~~ licensed by the Board may process a request for ~~refill of a prescription~~ medication received by a another pharmacy ~~within this state~~, provided...

2. Allow direct-to-patient dispensing from a central fill pharmacy.

The current definitions in subsections (a) and (b) effectively require filled prescriptions to route back through the originating pharmacy before reaching the patient. We recommend removing this constraint. Allowing a California-licensed central fill pharmacy to ship directly to patients improves medication access, reduces time to therapy, and eliminates additional handling steps that introduce unnecessary risk of error or delay:

§ 1707.4(a) — For purposes of this section, a central fill pharmacy is defined as a California-licensed pharmacy that, pursuant to a contract or on behalf of a pharmacy under common ownership, prepares and packages prescriptions for another pharmacy ~~to dispense to the patient~~.

§ 1707.4(b) — For the purposes of this section, the originating pharmacy is defined as the pharmacy that received the patient's initial prescription ~~and dispenses the medication to the patient~~.

Together, these revisions preserve all of the Board's safety and accountability requirements while removing restrictions that limit patient access and innovation in the pharmacy space. We also respectfully renew the request, made by multiple stakeholders, that if significant changes are finalized, pharmacies be given ample lead time to implement new systems and transition patients safely.

Thank you for taking our followup comments on Central Fill Pharmacies into consideration. Please do not hesitate to contact me at sarah@calretailers.com if you have any questions.

Sincerely,



Sarah Pollo Moo
Vice President
California Retailers Association

cc: Seung Oh, PharmD, President Board of Pharmacy
Anne Sodergren, Executive Officer, Board of Pharmacy
Julie Ansel, Assistant Executive Officer