September 25, 2026

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Letter sent electronically via email to PharmacyRulemaking@dca.ca.gov

Re: Support for the Board's Second Modified Text to 16 CCR section 1707.4 Related to Proposed Central Fill Pharmacies Regulations

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

On behalf of the California Retailers Association (CRA), we write in support of the California Board of Pharmacy's (Board's) second modified text recently released for California Code of Regulations, Title 16, section 1707.4, central fill pharmacies proposed regulations.

CRA represents retailers throughout California, including companies that operate retail pharmacies and provide pharmacy services to patients in communities across the state. Our members are committed to safe, timely, and accessible prescription-drug services, while maintaining robust patient protections and compliance with California's pharmacy laws.

CRA appreciates the Board's removal of the proposed requirement that a central fill pharmacy be located in California. Modern pharmacy operations frequently rely on centralized dispensing and fulfillment systems that can serve California patients safely and efficiently, subject to the Board's existing licensure, inspection, oversight, recordkeeping, and patient-protection requirements. A geographic-location mandate would unnecessarily limit operational flexibility, constrain access to central fill capacity, and potentially inhibit the efficient use of established pharmacy infrastructure without a corresponding patient-safety benefit.

We also support the addition of subsection (e), which expressly permits prescriptions filled by a central fill pharmacy to be delivered directly to patients through mail service. This provision appropriately recognizes the ways patients increasingly receive prescription medications and helps ensure that central fill services can support convenient, continuous access to prescribed therapies. Direct delivery is especially important for patients who face transportation barriers, live in underserved or rural areas, have limited mobility, or need a reliable option for ongoing medication access.

Finally, CRA appreciates the Board's use of the phrase "mail order pharmacy model," rather than simply "mail order pharmacy." That distinction is important. The term "mail order pharmacy" may carry separate meanings in pharmacy-benefit contracting, network design, reimbursement, and benefit administration. Those implications extend beyond the purpose of this rulemaking, which is to clarify that

central fill pharmacies may use direct-to-patient delivery through mail service. Referring to a "mail order pharmacy model" more accurately describes the delivery mechanism contemplated by the proposal and avoids unintentionally importing contracting or reimbursement consequences that are not necessary to accomplish the Board's regulatory objective.

For these reasons, CRA respectfully supports the proposed amendments to section 1707.4 and encourages the Board to adopt: (1) the removal of the in-state location requirement for central fill pharmacies; (2) proposed subsection (e) allowing direct-to-patient delivery through mail service; and (3) the "mail order pharmacy model" terminology.

Thank you for your consideration and for the Board's continued work to modernize pharmacy regulations while safeguarding California patients and access to care.

Sincerely,



Sarah Pollo Moo
Vice President
California Retailers Association

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