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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS

**VERBATIM EXCERPT OF DISCUSSION -
CHANGE IN THE INTERN HOURS REQUIREMENT**

MEETING OF:

STATE BOARD OF PHARMACY

TIME: 9:13 A.M.

PENNSYLVANIA DEPARTMENT OF STATE
Board Room B
One Penn Center
2601 North Third Street
Harrisburg, Pennsylvania 17110

November 27, 2018

State Board of Pharmacy

November 27, 2018

BOARD MEMBERS:

Janet Getzey Hart, R.Ph., Chairperson
Katelin Lambert, Deputy Commissioner, Bureau of
Professional and Occupational Affairs
Robert B. Frankil, R.Ph., Vice Chairman
Theresa M. Talbott, R.Ph., Secretary
Gayle A. Cotchen, Pharm.D./MBA, R.Ph.
Patrick M. Greene, Esquire, Office of Attorney
General

BUREAU PERSONNEL:

Kerry E. Maloney, Esquire, Board Counsel
Heather J. McCarthy, Esquire, Board Prosecution
Liaison
Keith E. Bashore, Esquire, Board Prosecutor
J. Karl Geschwindt, Esquire, Board Prosecutor
Alissa Harrison, Esquire, Board Prosecutor
Tara J. Smith, Esquire, Board Prosecutor
Melanie Zimmerman, R.Ph., Executive Secretary

ALSO PRESENT:

Patricia A. Epple, CEO, Pennsylvania Pharmacists
Association
Lisa Scannapieco, Director of Pharmacy Education and
Clinical Integration, Pentec Health
Barbara Knightly, Executive Vice President of
Pharmacy, Pentec Health
Rebecca S. Finley, Pharm.D., MA, FASHP, Dean,
Jefferson College of Pharmacy
James Reed, Area Healthcare Supervisor, Walgreens
Edward Foote, Pharm.D., FCCP, BCPS, Dean, Philadelphia
College of Pharmacy at the University of Sciences
Gregory Smith, Director of Pharmacy, Central Admixture
Pharmacy Services
Andrew C. Harvan, Esquire, Pennsylvania Medical
Society
John Sisto, Express Scripts, Incorporated
Erin R. Kawa, Esquire, Post & Schell, P.C.

State Board of Pharmacy

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ALSO PRESENT: (Continued)

- Lawrence P. Carey, B.S. Pharm, Pharm.D., Pennsylvania Society of Health-System Pharmacists/Temple School of Pharmacy
- Steve L. Sheaffer, Pharm.D., FASHP, Pennsylvania Society of Health-System Pharmacists
- Jenna L. McCarthy, Malady & Wooten
- Christine Roussel, Pharm.D., BCOP, Pennsylvania Society of Health-System Pharmacists, Doylestown Hospital
- Charles Hartwell, Esq.

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2 State Board of Pharmacy

3 November 27, 2018

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5 [VERBATIM EXCERPT AS REQUESTED BY MR. MALONEY.]

6 DR. FOOTE: As outlined in our letter,
7 the Deans of Pharmacy unanimously support removing the
8 500-hour requirement for intern hours above and beyond
9 what is required in our curriculum. As you may know,
10 we require 1740 hours through the Pharm.D curriculum
11 as required by our accreditation standards.

12 Those additional 500 hours, while we
13 think they are worthwhile and we think student
14 pharmacists learn from those experiences outside of
15 our curriculum, in particular over the last few years
16 they have really caused a number of problems, I think,
17 with the students. No other states or very few other
18 states require additional hours beyond what is
19 required in the curriculum for licensure.

20 And because of that, there is a real difficulty
21 for students who want to come into Pennsylvania to
22 practice pharmacy to get licensed in a timely manner.
23 Probably the biggest problem is with students who are
24 pursuing residencies. Probably about a third of
25 students nationwide pursue residency training, so

1 post-Pharm.D training and hospice, other healthcare
2 settings.

3 And for them to come to Pennsylvania,
4 many of these institutions will put some kind of time
5 frame on that for them to be licensed, and usually it
6 is sometime in the late summer, early fall. We have
7 had instances where students can't get those hours
8 transferred in a timely manner or they do not know how
9 to do it. They cannot get them verified, so we have
10 had problems with students not being licensed in a
11 timely manner. So, we would recommend that those
12 requirements be removed.

13 DR. FINLEY: I just want to add a few
14 things. As Ed alluded to, what has really changed
15 over the last decade from going back even to the
16 standards of 2008 with the accreditation of pharmacy
17 schools, the experiential portion of the curriculum is
18 longitudinal. It goes literally -- at many of our
19 schools, our students go out to their first rotation
20 the second week of classes. It goes longitudinally
21 across, rather than waiting until the concentration in
22 the fourth year, which many of us experience.

23 The other major thing that has
24 happened since the standards of 2008 that has even
25 raised, I think, in standards of 2016, is the intense

1 requirement for preceptor training, really preparing
2 our preceptors to be effective teachers in their
3 pharmacies and such that adds a lot to our quality
4 assurance and quality improvement program and the
5 amount of feedback that we get. So, we still need a
6 minimum of 1740 hours.

7 Many of our programs exceed that
8 amount of hours. Of course, as Ed said, many of our
9 students continue to do paid internships, but we
10 really feel that they are pretty well prepared, and
11 especially since we have such a great preceptor pool
12 out there, and the longitudinal nature of the
13 experience that they have.

14 MS. TALBOTT: I have two questions,
15 and you kind of alluded to one, Becky. How many --
16 what percentage of students do you think would get a
17 job in a pharmacy anyway, would get internship if it
18 was not required?

19 DR. FINLEY: In our school, it is
20 about -- it's close to 90 percent, probably.

21 MS. TALBOTT: Ed, do you think
22 that's --?

23 DR. FOOTE: Yeah, I would agree, and
24 think they will continue to do it, actually. I think
25 most of our students will get that experience, because

1 they understand the value.

2 DR. FINLEY: I can tell you that we
3 have across the Jefferson Health System, which we are
4 now, I think, 16, soon to be 18 hospitals and 13
5 retail establishments, some home infusion companies
6 and such. We employ student interns from at least
7 five different Schools of Pharmacy across Jefferson
8 Health, and that will remain a priority to offer that
9 employment opportunity for student pharmacists.

10 MS. TALBOTT: That was my next
11 question. Do you think that pharmacists will still
12 step up to be preceptors for the schools and
13 preceptors for private interns if it is not required?

14 DR. FINLEY: I can't speak to
15 community pharmacy, but I can tell you for health
16 system we depend on student pharmacists for manpower
17 for those employed hours. It really fills the need
18 between the technician level and the pharmacist level,
19 and our student pharmacists get an exceptional
20 experience doing that. So, those are highly sought
21 after positions. I can't imagine that they would
22 disappear.

23 MS. TALBOTT: And you would concur?

24 DR. FOOTE: Yeah.

25 MS. TALBOTT: Temple concurs. I know

1 -- I had the conversation with Doug Bricker from
2 Duquesne saying the same thing. He concurred as well.

3 Okay. That's all I have.

4 CHAIRPERSON HART: Any other
5 questions?

6 MR. FRANKIL: My question is a comment
7 -- maybe it's a question. So, if we remove the
8 requirement, the need for pharmacists to be a
9 preceptor would go away?

10 DR. FINLEY: No. Besides the --- we
11 have to have it for the --- I mean, they'd have to be
12 a preceptor with the school.

13 MR. FRANKIL: With the school?

14 DR. FINLEY: Yeah.

15 MR. FRANKIL: Right, but, for example,
16 I'm a preceptor for a student to work in my pharmacy.

17 MS. TALBOTT: If they wanted to get
18 paid as an intern, you'd still have to their
19 preceptor, because they can't work unsupervised.

20 MR. FRANKIL: Okay.

21 DR. FOOTE: Our assumption that there
22 still will be an intern licensure process.

23 MS. TALBOTT: Especially if the
24 immunization regs ever pass, we are going to need a
25 preceptor to supervise the pharmacy intern.

1 MR. FRANKIL: Okay.

2 DR. FINLEY: We continue to support
3 intern licensure. A number of states have done away
4 with that or insist students be registered
5 technicians.

6 MS. TALBOTT: So, Melanie, just ---.

7 MR. MALONEY: In the act, it talks
8 about it, the intern requirement.

9 MS. TALBOTT: Yeah, I think it's in
10 the act and then the requirements are in the reg, but
11 if we --- so we waive them until 2020. So, I guess
12 when we get into this time or middle of next year, we
13 actually have to look at how are we going to waive
14 them further out, depending on where the General
15 Revisions are in the process, if we would choose to do
16 that.

17 MR. MALONEY: Yes, and we have the
18 other waiver to look at in January. But along those
19 lines, one thing for the Board to consider is it's not
20 just Pennsylvania interns, but how do we treat the
21 intern requirement for those coming from out of state.
22 So, that's something the Board also needs to consider
23 as we look at the regulations.

24 MS. TALBOTT: Yeah, so if we are going
25 to waive that requirement, we might want to talk about

1 new licensure. We have to talk about is it Pharm.D.
2 grads; is it, you know, anybody who has graduated
3 from ACPE, you know, outside the state.

4 MR. MALONEY: For our guests, the
5 accreditation that we talk about, is that ACPE
6 accreditation?

7 DR. FINLEY: Yes.

8 MR. MALONEY: And that requires, what
9 did you say, 750?

10 DR. FINLEY: 1740 is the minimum.
11 Many schools have more than that in their curriculum.

12 MR. MALONEY: That's total intern
13 hours?

14 DR. FINLEY: Total intern hours, and
15 it has to include community pharmacy, hospital
16 pharmacy, direct patient care, clinical pharmacy,
17 ambulatory care.

18 DR. FOOTE: But we would call those
19 experiential hours as opposed to intern hours, which
20 are the Board mandated hours.

21 I guess I would just add as you talk
22 about people coming from other states. That's
23 probably the biggest problem. You know, our own
24 students who live in Pennsylvania, go to school in
25 Pennsylvania, they kind of get it. I do not see that

1 that's the problem.

2 In particular, it's new graduates who
3 have come in or students from other schools. Some of
4 our health systems are actually kind of -- are very
5 concerned about their being able to practice and
6 quality of candidates from outside the state.

7 DR. FINLEY: That's been an issue
8 several times at Jefferson Health with our --- we have
9 four residency programs across Jefferson Health and
10 occasionally somebody matches into the residency that
11 does not have those extra hours.

12 That has been a problem, because under
13 the ASHP residency accreditation, one must be
14 licensed, I think, before October 1st. And to get
15 those hours, you have to have a very benevolent
16 residency program director to be able to accomplish
17 that.

18 MR. MALONEY: Another thing for the
19 Board to consider is both in state and out of state.
20 Again, the experience that's required both for
21 interns, residents, I think we need to include all of
22 that. And for all of the deans of the Pennsylvania
23 schools, I intend to include all of you as
24 stakeholders, so any exposure draft that would go out
25 would be sent to you for your comments.

1 For the Board, it's always kind of a
2 balancing act. Do we include that in General
3 Revisions, or do we do a separate one on its own? In
4 something like this that really is a discrete item in
5 the regulations, I normally would recommend sending it
6 forward on its own because -- well, you've seen how
7 big the General Revisions are.

8 It could get lost in there. And if
9 the General Revisions are held up for some other
10 reason, then it also holds this up. So, that would be
11 my recommendation, and the Board can discuss whether
12 we want to move forward with something like that.

13 But I do appreciate you coming here.
14 Actually, some of the things you've said I haven't
15 considered that will be important.

16 [END OF REQUESTED VERBATIM.]

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19 EXCERPT CONCLUDED AT 9:30 A.M.

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CERTIFICATE

I hereby certify that the foregoing proceedings, Discussion regarding the Change in the Intern Hours Requirement, was reported by me on November 27, 2018 and that I, Adam Beck, read this transcript, and that I attest that this transcript is a true and accurate record of the proceeding.

A handwritten signature in black ink, appearing to read "Adam Beck", is written over a horizontal line.

Adam Beck,

Court Reporter