



# Transition Pharmacy to Standard of Care Regulation


OSHP Legislative Priority for 2027





## Learning objectives

- **Define Standard of Care Regulation basic requirements**
- **Describe the current status of Standard of Care Regulation in the US**



## Standard of Care (SoC) Defined

- The National Institute of Health definition:  
**“treatment that is accepted by medical experts as a proper treatment for a certain type of disease and that is widely used by healthcare professionals”**
- NABP Model State Pharmacy Act definition:  
**“the degree of care a prudent and reasonable licensee or registrant with similar education, training, and experience will exercise under similar circumstances”**

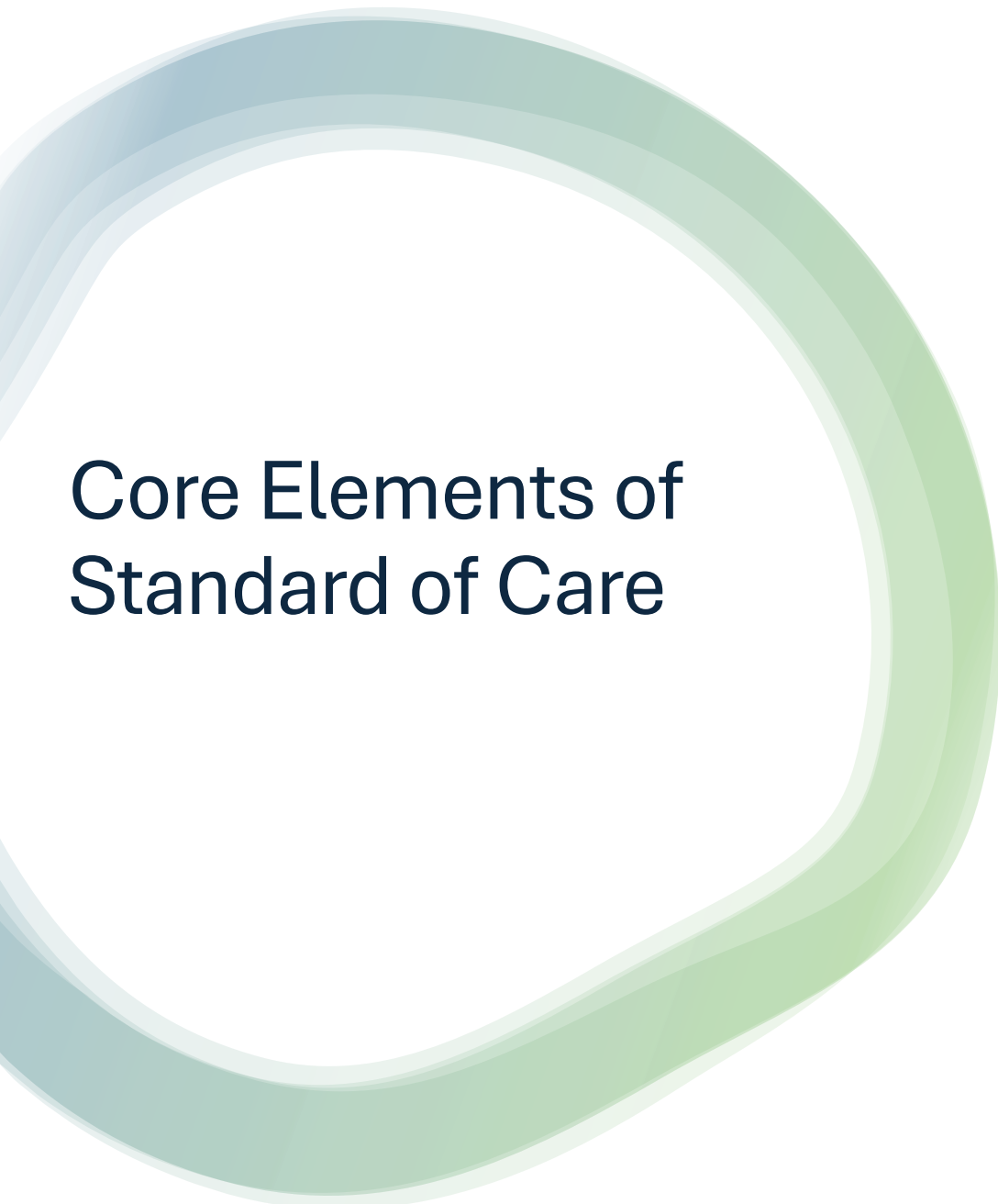


## Standard of Care Model

Standard of Care does **NOT** automatically grant full independent practice authority

For an act to be within the scope of pharmacy practice, it must:

1. **Not be expressly prohibited by any state or federal laws**
2. **Consistent with the licensee's education, training, and experience**
3. **Within the accepted standard of care that would be provided in a similar setting by a reasonable and prudent licensee with similar education, training, and experience**



## Core Elements of Standard of Care

- 1. “Standard of Care” definition codified in law**
  - **Care that would be provided by a reasonable and prudent practitioner with similar education, training and experience**
- 2. Acts or omissions failing to meet standard of care included in discipline standards**
- 3. Delegation of tasks to technicians under supervision based on standard of care**

# Idaho – First State to Implement SOC



## 54-1705. PRACTICE OF PHARMACY -- GENERAL APPROACH

To evaluate whether a specific act is within the practice of pharmacy in or into Idaho, or whether an act can be delegated to other individuals under his supervision, a licensee or registrant of the board of pharmacy shall **independently** determine whether:

- (1) The act is **expressly prohibited** by:
  - (a) This chapter;
  - (b) The uniform controlled substances act, chapter 27, title 37, Idaho Code; or
  - (c) Any other applicable state or federal laws or regulations;
- (2) The act is **consistent with the individual's education, training, and experience**; and
- (3) Performance of the **act is within the accepted standard of care that would be provided in a similar setting by a reasonable and prudent individual with similar education, training, and experience.**

# Idaho – First State to Implement SOC



- IDAPA 24.36.01.104. Unprofessional Conduct
  - 16. Acts or omissions within the practice of pharmacy which fail to meet the standard provided by other qualified licensees or registrants in the same or similar setting.



# Iowa

## 155A.2B Practice of pharmacy — general principles.

To evaluate whether an act by a licensee or registrant under this chapter violates the appropriate standard of care, a licensee or registrant of the board must consider all the following:

1. Whether performance of the act is **expressly prohibited by a provision of this chapter.**
2. Whether performance of the act is **expressly prohibited by a rule adopted by the board.**
3. Whether performance of the **act is consistent with the education, training, and experience of a licensee or registrant.**
4. Whether performance of the **act is within the accepted standard of care that would be provided in a similar setting by a reasonable and prudent licensee or registrant with similar education, training, and experience.**



# Iowa

## 155A.12 Grounds for Discipline.

11. Engaged in conduct outside the accepted standard of care that would be provided in a similar setting by a reasonable and prudent applicant or licensee.

# Payment Parity – The Missing Piece



- Lack of reimbursement is a commonly listed barrier to implementation of pharmacy services
- Along with expanding the pharmacists' authority to provide care, securing payment commensurate with the service provided is essential
- PECOS
  - Provider Enrollment, Chain and Ownership System
  - Medicare online system for enrollment as provider
  - Issues PTAN
- PTAN
  - Provider Transaction Access Number
  - Claims billed thru NPI, but requires PTAN



## Key Takeaways

- Standard of Care with full practice authority enables pharmacist scope of practice to be defined based on institutional policies and procedures
  - Pursuant to individual circumstances – training, education, competence and available resources
- Formal privileging of pharmacist practitioners will increase leverage to seek reimbursement from payers for a wider array of pharmacist-provided services
- Standard of care approach to delegated authorities creates additional opportunities for innovative utilization of pharmacy technicians



# OSHP Legislative Affairs priority for 2027

- Develop consensus on Standard of Care legislative language and concepts among OSHP members and other key stakeholders
- Obtain OSHP Board of Directors approval of legislative action
- Develop statutory and regulatory framework for Standard of Care regulation in Oregon
- Provide Legislative Concept to sponsors in Nov 2026
- Advocate for passage of Standard of Care bill
- After passage, work with Oregon Board of Pharmacy for appropriate rule adoption

# Check the Resources Page for Information on Standard of Care

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**REFER OTHERS**  
Do you know someone who would benefit from being a part of Oregon Society of Health-System Pharmacists?  
Refer them today!

# Self-Assessment Question

What is a key principle of the Standard of Care (SOC) model in pharmacy practice?

- A. It grants pharmacists full independent practice authority without limitations
- B. It requires all pharmacy services to be explicitly listed in state regulations
- C. It allows pharmacists to provide services aligned with their education and training, unless expressly prohibited by law
- D. It replaces the need for collaborative practice agreements entirely

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- Which of the following are key elements of Standard of Care regulations?
  - A. Standard of Care defines the scope of practice pursuant to individual circumstances training, education, competence and available resources.
  - B. Standard of Care approach to delegated authorities creates additional opportunities for innovative utilization of pharmacy technicians
  - C. Within the accepted standard of care that would be provided in a similar setting by a reasonable and prudent licensee with similar education, training, and experience
  - D. All of the above

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