



Idaho State Board of Pharmacy

1199 W Shoreline Lane Ste 303 Boise, Idaho 83702-9103 <http://bop.idaho.gov>
P.O. Box 83720 Boise, Idaho 83720-0067 208.334.2356 208.334.3536 fax

STRATEGIC PLAN FOR FISCAL YEARS 2020-2023

MISSION:

Promote, preserve and protect the health, safety, and welfare of the public by and through the effective control and regulation of the practice of pharmacy.

The Idaho Board of Pharmacy, established on March 23, 1905, is a self-governing agency operated with dedicated funds generated from application, renewal and inspection fees. The Board has primary responsibility for regulating the practice of pharmacy and drug outlets that manufacture, distribute, and/or dispense drugs, medications, devices, and other materials that may be used in the diagnosis and treatment of injury, illness, and disease. The Board also administers the regulatory provisions of the Uniform Controlled Substances Act, and in this capacity aims to minimize prescription drug abuse.

OUTCOME-BASED VISION:

To embrace a culture of innovation in pharmacy practice and ensure Idaho residents have access to the safest and highest quality of pharmaceutical care.

The Idaho Board of Pharmacy is committed to protection of the public with the lightest possible hand of government. This is accomplished through cost-efficient licensing and registration, inspections, and investigations. The Board envisions continuous technological advancements as well as rapid advancements in the education of pharmacists and pharmacy support staff, and strives to serve as a facilitator, not a hindrance, for this evolution by embracing the concept of "permissionless innovation."

KEY EXTERNAL FACTORS:

Shifting economic, political, social and professional climates that are beyond the Board's control may impact the accomplishment of long-range goals and objectives. These include:

- State legislation can alter or significantly impact the functions of the Board.
- Federal law changes can create marketplace confusion or spur the need for corresponding state action.
- Economic conditions within the state are dynamic and constantly evolving, and this can lead to unpredictability in the growth of licensees and registrants.
- Technology is evolving faster than regulatory agencies can realistically keep up with in regard to rulemaking.
- Increasing costs and concerns with the quality of healthcare will continue to gain media attention.
- Prescription drug abuse is nearing epidemic proportions.

- The accreditation standards for colleges of pharmacy continue to evolve and focus more on direct patient care services.
- Advancements in pharmacy technician education and training create new synergies for the practice of pharmacy.

GOAL #1: Maintain and refine Idaho pharmacy law to ensure it facilitates innovation while protecting public safety

OBJECTIVES:

1. Identify opportunities for improvement.
 - a. Agency staff collects comparative data and information from other states, including their experiences and outcomes
 - b. Agency staff monitors for federal law changes relevant to the practice of pharmacy
 - c. Board members and Executive Director participate in the National Association of Boards of Pharmacy (NABP) to identify innovative concepts that may be replicated in Idaho
 - d. Agency staff cultivates ideas and feedback from relevant stakeholders, including licensees and registrants of the Board
 - e. Board members and Executive Director identify opportunities to remove restrictions on practice and barriers to entry
 - f. Executive Director identifies opportunities to increase license portability and mobility
2. Pursue agency legislation to operationalize identified opportunities
 - a. Executive Director works closely with the Division of Financial Management and the Governor’s staff to ensure close alignment of agency legislation with executive priorities
 - b. Executive Director submits requisite forms and draft legislative language within established deadlines
3. Pursue rule changes to operationalize identified opportunities
 - a. Executive Director ensures robust negotiated rulemaking with multiple opportunities for public input and engagement
 - b. Executive Director works closely with the Division of Financial Management to ensure all requisite forms are submitted within established deadlines
 - c. Agency staff exceeds expectations in terms of transparency and openness of rulemaking process
4. Monitor all introduced state legislation for implications on agency or pharmacy practice

Performance Measure	Benchmark
Within each fiscal year, Attend all NABP meetings (NABP Annual, District, Executive Officers Forum, Compliance Officers Forum)	100% attendance by applicable staff (Executive Director, Deputy Director and a compliance officer as well as Board members) ¹ .
Between March and October annually, host public listening sessions and/or negotiated rulemaking across the state	Host at least one program in North, Central, East, and Southwest Idaho ² .

During negotiated rule making annually, ensure regulations do not impose unneeded restrictions or barriers to entry.	Limit word count growth in Board rules to less than 5% of baseline across the life of strategic plan (excluding federal- or legislatively-imposed mandates) ³ .
During each legislative session, review and analyze all relevant non-agency legislative proposals	Complete within three (3) days of introduction by print hearing ⁴ .
<ol style="list-style-type: none"> 1. Indicates full participation 2. Indicates majority coverage of the state 3. Based on goal to reduce restrictions and barriers 4. Based on goal for interagency collaboration/cooperation 	

GOAL #2: Educate licensees and registrants on Idaho pharmacy law and impending changes

OBJECTIVES:

1. Executive agency staff creates and emails a newsletter to all pharmacists, pharmacy technicians, and pharmacy interns highlighting new law changes and FAQs
2. Executive agency staff presents on pharmacy law at all in-state pharmacy conferences
3. Executive agency staff hosts standalone continuing education (CE) programs on law updates

Performance Measure	Benchmark
Each fiscal year produce timely newsletters to all pharmacists, pharmacy technicians, and pharmacy interns.	Send four (4) newsletters a year ¹ .
Present at ISHP Annual, ISHP Midyear, and Northwest Pharmacy Convention when scheduled throughout the year.	Presentation at 100% of in-state conferences ² .
Offer standalone CE programs on law updates with emphasis towards spring before new rules take effect.	At least five (5) sessions hosted annually throughout the state ³ .
<ol style="list-style-type: none"> 1. Based on goal to provide timely information for licensees and registrants 2. Indicates full participation in State Association meetings 3. Indicates majority coverage of the state 	

GOAL #3: Protect public safety by effectively regulating the practice of pharmacy.

OBJECTIVES:

1. Licensing team maintains an efficient, accurate, and responsive licensing system to ensure the minimum requirements are met for all pharmacists, facilities, practitioners, and others as authorized by Idaho Code.

2. Licensing team skillfully implements law changes related to licensing & registration and operationalizes all changes in the agency’s licensing system in a manner that minimizes disruption to end users.
3. Compliance Officers inspect all pharmacies and prescriber drug outlets in a timely, risk-based fashion to ensure Idaho pharmacy laws are being followed.
4. Executive agency staff investigates and resolve complaints in a timely fashion, pursuant to documented complaints and deficient inspections.

Performance Measure	Benchmark
Timely processing of technician-in-training applications	Greater than 95% of applications processed within 18 calendar days each fiscal year ¹ .
Timely processing of pharmacist license reciprocity applications	Greater than 95% of applications processed within 45 calendar days each fiscal year ² .
Timely inspection of all pharmacies located in Idaho	100% of facilities inspected in an 18-month time period ³ .
Timely inspection of all prescriber drug outlets located in Idaho	100% of facilities inspected in an 18-month time period ⁴ .
Timely resolution for complaints under the Board’s jurisdiction that avoid the need for hearing.	Greater than 90% of cases the agency acted upon will be resolved by means other than hearing ⁵ .
1. Based on need to provide timely registrations to applicants 2. Represents a 50% increase in efficiency over previous strategic plan 3. Based on need to provide timely inspections for pharmacies 4. Based on need to provide timely inspections of PDO’s 5. Based on goal to resolve cases through education and informal action	

GOAL #4: Optimize the use and functionality of the state’s Prescription Monitoring Program (PDMP)

OBJECTIVES:

1. Identify opportunities for improvement
 - a. Investigations and/or compliance staff to attend meetings of the National Association of State Controlled Substances Authorities (NASCSA) to identify innovative concepts that may be replicated in Idaho
 - b. Investigations staff to participate in meetings and calls with Appriss
 - c. Investigations staff to monitor relevant resources, including those from the National Alliance for Model State Drug Laws (NAMSDL), Harold Rogers meetings, and PDMP Training and Technical Assistance Center (TTAC)
 - d. All agency staff to cultivate ideas and feedback from relevant stakeholders, including licensees & registrants of the Board, and law enforcement.
2. Facilitate uptake and use of the PDMP
 - a. Investigations staff to streamline access to PDMP data in a safe and secure fashion for legally-authorized end users

- b. All agency staff to educate prescribers and pharmacists on appropriate use of the PDMP
3. Harness data in PDMP for educational purposes
- a. All agency staff work with Office of Drug Control Policy to release aggregate data on trends that can be used to improve health and safety

Performance Measure	Benchmark
Percentage of controlled substance prescriptions that pharmacists check PDMP on prior to dispensing	Baseline was 6.7%; work toward 20% over life of strategic plan ¹ .
Percentage of controlled substance prescriptions that the Top 100 prescribers check PDMP	Baseline was 35%; work toward 50% over life of strategic plan ² .
Number of CE programs on appropriate PDMP use	At least three (3) programs hosted annually ³ .
1. Internal target representing nearly a four-fold increase in utilization of the PDMP 2. Internal target representing significant increased utilization of the PDMP 3. Represents a tripling of programs offered over previous strategic plan to encourage improvement in PM #2	

Addendum: Red Tape Reduction Act

The Idaho Board of Pharmacy’s efforts to reduce regulatory burden and stream line rules started before Executive Order 2019-02 was issued. Those efforts can be summarized by stating the Board rules presented to and approved by the 2018 legislature reduced word count by 55% overall with 65% of the restrictions being removed. In accordance with the Red Tape Reduction Act, the board looked to cut an additional 10-12 pages from the rules. Following the February and April board meetings the legislature failed to authorize the renewal of the administrative rules, thus creating a unique opportunity for DFM to work with agencies to determine which rules should be reprinted/reauthorized. The Board of Pharmacy maximized the opportunity to combine those changes that the board had already reviewed and approved at two previous meetings that were non-controversial to be wrapped into the Omnibus rule making. In doing so the board has already exceed their goal for the Red Tape Reduction Act with a near 70% overall reduction in rules to date. The Board of Pharmacy was honored to receive a Certificate of Recognition at the Red Tape Reduction Appreciation and Awards Ceremony held on June 21, 2019 for our efforts to reduce regulatory burden. That said, the board continues to work through the negotiated rule making process with further streamlining efforts in mind for the upcoming legislative session. Specific numbers will be reported in the Performance Measures Report later this summer.

Addendum to Agency Strategic Plans:

Adoption of the NIST Cybersecurity Framework & Implementation of CIS Critical Security Controls 1–5.

As a technology customer of the Office of Information Technology Services (ITS) in the Governor’s Office, we are using the cybersecurity systems and technical expertise in ITS to fulfill requirements related to Executive Order 2017-02. Staff from ITS briefed the NIST Core Framework, CIS Controls 1-5, and their plan for adoption of the NIST Cybersecurity Framework. We participate in DHR and ITS administered cybersecurity training, as awareness is a critical component of an effective cybersecurity program. As briefed by ITS staff, implementation of the CIS Controls 1-5 will be their responsibility for the systems they operate and, as technological tools applied to the computer systems, largely invisible to us as a customer. ITS, working through the multi-agency Incident Response Task Force, has developed an Incident Response Program in support of our agency.