



To: Senate Public Health and Welfare

From: Rachelle Colombo
Executive Director

Date: February 25, 2021

Re: SB 200; expanding the scope of practice of pharmacy

The Kansas Medical Society appreciates the opportunity to provide comments today in opposition to the expanded scope of practice established in SB 200.

SB 200 authorizes a pharmacist to test or screen for and initiate therapy for influenza, strep, COVID-19, prophylaxis, or any other health condition as approved by the Board of Pharmacy. Additionally it allows for the “initiation of drugs” which is prescribing.

Though this has been presented as a minor change allowing for routine testing of a few conditions, it is actually a broad expansion of scope authorizing independent testing, management, and prescribing around any conditions for which the Board of Pharmacy develops a protocol. Notably, there is no requirement for physician involvement or collaboration with the Board of Healing Arts in developing the protocols that would govern pharmacist’s independent practice of these delegated medical acts.

Finally, section (I) allows a pharmacist to independently and immediately dispense any drug they believe to be necessary to the patient’s imminent health and safety outside of the parameters of established collaborative drug management and protocols designed to address these very situations. Not only is this unnecessary, it dangerously assumes that a pharmacist could independently dispense outside of the explicit authority of a physician without knowing a patient’s full medical history or drug regimen and potential contraindications. If pharmacists believe such a provision is necessary, it only stands to reason the physicians would also be authorized to dispense medications in their offices whenever they believe they are imminently necessary.

There is a long history of physicians and pharmacists working together to serve patients in a way that promotes safety and considers access, convenience, and protocols designed to optimize the health care team. The Kansas Medical Society welcomes discussions including the pharmacists, Board of Pharmacy and Board of Healing Arts about reviewing and potentially expanding statewide protocols for some of the health conditions listed here. However, SB 200 is unnecessarily broad and does not acknowledge or account for the practice of medicine being authorized under this bill. We respectfully urge your opposition to SB 200. Thank you.