



February 24, 2025

The Honorable Eric Barlow
Chairman
Labor, Health & Social Services Committee
200 W 24th St
Cheyenne, WY 82001

The Honorable Rachel Rodriguez-Williams
Chairman
Labor, Health & Social Services Committee
200 W 24th St
Cheyenne, WY 82001

Wyoming House Bill 164 – OPPOSE

Chairman Barlow, Chairman Rodriguez-Williams, and members of the Labor, Health & Social Services Committee:

The American Pharmacists Association (APhA) respectfully writes to oppose [House Bill \(HB\) 164](#), which is unnecessary and may create confusion regarding pharmacists' existing authority to dispense medications for off-label indications. Pharmacists already have the professional ability and expertise to dispense medicines for off-label uses within their state scope of practice, as they regularly evaluate the safety and appropriateness of prescriptions and receive a state issued license from the Wyoming State Board of Pharmacy.

One of the key roles of the pharmacist as an interprofessional health care team member is to ensure their patients' safe and effective use of medications. Pharmacists do this through steps in the medication dispensing process, such as prospective drug utilization review, where the pharmacist evaluates the appropriateness of a medication for an individual patient before the medication is dispensed. Pharmacists review evidence-based, peer-reviewed published literature to confirm the appropriate medication use for a specific indication. They check for the safe and effective dose of medication for a specific patient. This is especially important for patients with allergies, kidney disease, liver disease, or other past medical histories that may change a medicine's safe or effective dose. Pharmacists review a medicine's interactions with other drugs, disease states, foods, or interactions with other items. This is completed under the pharmacist's state scope of practice and within their professional judgment and state license. It is formed through six to eight years of collegiate and doctoral-level training, including over 1,700 hours of hands-on experiential education in patient care settings.

In addition to the medication expertise pharmacists contribute during the dispensing process, pharmacists also provide numerous patient care services to their patients to optimize the safe and effective use of medications, increase access to acute and preventative care, and work collaboratively with other members of the health care team to assist patients in reaching their therapeutic goals.

The result of pharmacists using their professional judgment and providing the care they were trained to provide is patients reaching their therapeutic goals, cost savings in health care expenditures, and preventing thousands of potentially fatal medication errors yearly. For example, a study found that pharmacists at one community pharmacy made around 17,000 clinical interventions in a year, resulting in \$2.4 million in cost savings and the prevention of numerous medication errors for their patients.¹ Extensive published literature has also proven that patients are healthier when pharmacists are involved in their care,² with a \$9.64 return on investment for every \$1 when pharmacists are paid to provide various patient care services.³

HB 164 is unnecessary because pharmacists already dispense medications for off-label indications when clinically appropriate. The bill does not expand pharmacists' authority or add additional protections. Instead, it codifies what is already standard practice, potentially leading to unintended consequences, such as creating confusion regarding existing pharmacist responsibilities or imposing unnecessary regulatory burdens. Furthermore, professional oversight of pharmacists is already well established through the Wyoming State Board of Pharmacy making additional legislative action redundant.

For these reasons, we strongly oppose HB 164 and respectfully request your "NAH" vote. If you have any questions or require additional information, please don't hesitate to contact E. Michael Murphy, PharmD, MBA, APhA Senior Advisor for State Government Affairs, by email at mmurphy@aphanet.org.

Sincerely,



Michael Baxter
Vice President, Government Affairs

cc: Senator Gary Crum
Senator Lynn Hutchings
Senator Charles Scott
Senator Cheri Steinmetz
Representative Ken Clouston
Representative Joel Guggenmos
Representative Paul Hoeft
Representative Darin McCann
Representative Pepper Ottman
Representative Clarence Styvar
Representative Jacob Wasserburger
Representative Mike Yin

¹ Pharmacy Saves Payer \$2.4 Million by Making Clinical Interventions a Priority. *Pharmacy Times*. Available at

<https://www.pharmacytimes.com/view/pharmacy-saves-payer-24-million-by-making-clinical-interventions-a-priority>

² Giberson S, et al. Improving Patient and Health System Outcomes through Advanced Pharmacy Practice. *A Report to the U.S. Surgeon General*. Available at <https://jcnp.net/wp-content/uploads/2015/09/Improving-Patient-and-Health-System-Outcomes-through-Advanced-Pharmacy-Practice.pdf>

³ White ND, Lenz TL, Skrabal MZ, Skradski JJ, Lipari L. Long-Term Outcomes of a Cardiovascular and Diabetes Risk Reduction Program Initiated by a Self-Insured Employer. *Am Health Drug Benefits*. 2018;11(4):177-183.

About APhA: APhA is the largest association of pharmacists in the United States advancing the entire pharmacy profession. APhA represents pharmacists in all practice settings, including community pharmacies, hospitals, long-term care facilities, specialty pharmacies, community health centers, physician offices, ambulatory clinics, managed care organizations, hospice settings, and government facilities. Our members strive to improve medication use, advance patient care, and enhance public health. **In Wyoming, with 540 licensed pharmacists and 720 pharmacy technicians, APhA represents pharmacists, students, and pharmacy technicians that practice in numerous settings and provide care to many of your constituents.** As the voice of pharmacy, APhA leads the profession and equips members for their role as the medication expert in team-based, patient-centered care. APhA inspires, innovates, and creates opportunities for members and pharmacists worldwide to optimize medication use and health for all.