



March 30, 2025

[Submitted electronically via: sunrise@doh.wa.gov]

The Honorable Umair Shah, MD, MPH
Washington State Secretary of Health
Washington State Department of Health
PO Box 47890
Olympia, WA 98504-7890

RE: Health profession sunrise reviews in progress: Pharmacist Scope of Practice

Dear Secretary Shah:

The American Pharmacists Association (APhA) appreciates the opportunity to comment on the [proposal](#) to better align pharmacists' scope of practice with their education and training through the sunrise criteria in RCW 18.120.010.

For over 45 years, Washington pharmacists have played an essential role in patient care by providing care with prescriptive authority under collaborative drug therapy agreements (CDTAs). However, the current requirement for CDTAs creates unnecessary barriers, limiting patient access to pharmacist-provided care, particularly in rural and underserved communities. The sunrise review process provides a critical opportunity to modernize pharmacist practice by allowing pharmacists to prescribe independently, similar to what has been successfully implemented in states like Idaho, Colorado, and Montana.

Addressing Health Care Shortages in Washington

Washington faces significant health care workforce shortages, with over 2.6 million residents living in designated primary care health professional shortage areas.¹ The Health Resources and Services Administration (HRSA) estimates that 499 additional primary care practitioners are needed to meet patient demand. With 9,450 licensed pharmacists in the state and over 900 pharmacies in underserved areas, pharmacists stand to play an essential and efficient role in addressing the health care workforce shortage.^{2,3}

¹ Bureau of Health Workforce Health Resources and Services Administration (HRSA) U.S. Department of Health & Human Services. Designated Health Professional Shortage Areas Statistics: First Quarter of Fiscal Year 2025 Designated HPSA Quarterly Summary. Published December 31, 2024. <https://data.hrsa.gov/default/generatehpsaquarterlyreport>. Accessed March 18, 2024.

² U.S. Bureau of Labor Statistics. Occupational Employment and Wage Statistics. <https://data.bls.gov/oes/#/geoOcc/Multiple%20occupations%20for%20one%20geographical%20area>.

³ Murphy EM, West L, Jindal N. Pharmacist provider status: Geoprocessing analysis of pharmacy locations, medically underserved areas, populations, and health professional shortage areas. J Am Pharm Assoc (2003). 2021 Nov-Dec;61(6):651-660.e1. doi: 10.1016/j.japh.2021.08.021. Epub 2021 Aug 27.

By aligning pharmacists' prescriptive authority with their education and training, Washington can address these gaps by allowing pharmacists to treat minor ailments, manage chronic diseases, and provide preventive care, improving access to cost-effective health services.

Eliminating Administrative Barriers

While CDTAs have allowed pharmacists to prescribe within defined agreements, locating willing prescriber partners has become increasingly difficult due to corporate employer policies restricting prescriber participation. The Washington State Pharmacy Association (WSPA) has documented that pharmacists often wait months to secure a prescriber partner, leading to gaps in patient care. The administrative burden of CDTAs also creates inefficiencies, requiring constant renewals and re-filing with the Pharmacy Quality Assurance Commission (PQAC). Allowing pharmacists to prescribe based on their training and experience rather than relying on external agreements eliminates these administrative barriers and increases the efficiency of care delivery.

Ensuring Safe and Effective Patient Care

Pharmacists play a critical role as medication experts within the health care team, ensuring that patients receive safe and effective medication therapy. Their expertise extends beyond dispensing to include comprehensive patient assessment, therapeutic decision-making, and ongoing medication management. Pharmacists rely on their extensive education, clinical experience, and evaluation of high-quality, evidence-based literature to optimize medication use for individual patients. Pharmacists' education and training include completing a Doctor of Pharmacy (PharmD) degree, which requires six to eight years of study and over 1,700 hours of hands-on patient care experience. This education and training prepare them to provide a range of direct patient care services. Under CDTAs, pharmacists in Washington already initiate, modify, and manage medications for numerous conditions, including, but not limited to, diabetes, hypertension, smoking cessation, contraception, and infectious diseases across hospital, ambulatory care, and community settings. Given their established role in patient care and demonstrated ability to ensure the safe and effective use of medications, pharmacists are well-equipped to prescribe medications independently. Recognizing pharmacists' ability to prescribe independently will increase patient access to timely, high-quality care while maintaining the rigorous safety standards already inherent in pharmacy practice.

Economic and Public Health Benefits

Substantial published literature documents the proven and significant improvement to patient outcomes⁴ and reduction in health care expenditures⁵ when pharmacists are optimally leveraged as the medication experts on patient-care teams. A recent scoping review evaluating the return on investment (ROI) of pharmacists' services among non-hospitalized patients found an ROI ranging "from \$1.29 to \$18.50 per dollar spent on the pharmacy service among the 19 studies that reported ROI as a ratio."⁶ By modernizing

⁴ Giberson S, Yoder S, Lee MP. Improving Patient and Health System Outcomes through Advanced Pharmacy Practice. A Report to the U.S. Surgeon General. Office of the Chief Pharmacist. U.S. Public Health Service. Dec 2011. Available at:

https://www.accp.com/docs/positions/misc/improving_patient_and_health_system_outcomes.pdf

⁵ Murphy EM, Rodis, JR, Mann HJ. Three ways to advocate for the economic value of the pharmacist in health care. Journal of the American Pharmacists Association. August 2020. Available at:

<https://www.sciencedirect.com/science/article/abs/pii/S1544319120303927>

⁶ Almodovar AS, Blankenship B, Murphy EM, et al. Return on investment of pharmacists' services among non-hospitalized patients: A scoping review. Research in Social and Administrative Pharmacy. 2025. Article in Press. DOI: [10.1016/j.sapharm.2025.01.012](https://doi.org/10.1016/j.sapharm.2025.01.012)

pharmacy practice, the Department of Health can ensure that Washingtonians receive timely, high-quality care while reducing the burden on an already strained health care system.

For these reasons, APhA urges the Washington State Department of Health to support the proposal to better align pharmacists' scope of practice with their education and training through the sunrise criteria in RCW 18.120.010. If you have any questions or require additional information, please do not hesitate to contact E. Michael Murphy, PharmD, MBA, APhA Senior Advisor for State Government Affairs, by email at mmurphy@aphanet.org.

Sincerely,

A handwritten signature in black ink that reads "Michael Baxter". The script is cursive and fluid.

Michael Baxter
Vice President, Government Affairs

cc: Jenny Arnold, Chief Executive Officer, Washington State Pharmacy Association

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 Washington, with 9,450 licensed pharmacists and 8,890 pharmacy technicians, APhA represents the pharmacists and student pharmacists that practice in all 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.