

**BOARD OF PHARMACY
WHITE AND BROWN BAGGING WORKGROUP
October 13, 2021
9:00 a.m. ET
Hyatt Regency Orlando International Airport
9300 Jeff Fuqua Boulevard
Orlando, FL 32827
407-825-1234**

Participants in this public meeting should be aware that these proceedings are being recorded and that an audio file of the meeting will be posted to the board's website.

I. CALL TO ORDER/ROLL CALL

Dr. Hickman called the meeting to order at 9:00 a.m. ET.

MEMBERS PRESENT

Jonathan Hickman, PharmD
Patty Ghazvini, PharmD, BCGP
Dorinda Segovia, PharmD, MBA

STAFF PRESENT

Jessica Sapp, Executive Director
Traci Zeh, Program Administrator

WORKGROUP MEMBERS PRESENT

Ken Komorny, PharmD, BCPS
Michael Diaz, MD
Richard Palombo, RPh, DPh
Mark Percifield, PharmD
Jorge Garcia, PharmD, MS, MHA,
MBA, FACHE

BOARD COUNSEL

David Flynn, Esq.
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II. NEW BUSINESS

a. White and Brown Bagging Emerging Practices

The Board of Pharmacy received correspondence from the Florida Society of Health System Pharmacists, Inc (FSHP) regarding White and Brown Bagging Practices. Subsequent to their request for discussion the Board formed a workgroup made up of three Board of Pharmacy members and health care professionals from the public. The Workgroup discussed White and Brown Practices during the August 25, 2021. At the conclusion of that meeting Dr. Hickman tasks the workgroup members with identifying what changes they would make to the practices and asked for data to be collected from other states.

This was placed on the agenda to continue the discussion.

Members of the Workgroup addressed the Committee.

Dr. Palombo addressed the Workgroup and suggested the Board put forth regulations within the pharmacies policies and procedures to secure the safe delivery of the medications.

Dr. Diaz addressed the Workgroup in opposition of setting regulations within policies and procedures as majority of facilities do not engage in the practice of white and brown bagging; therefore, there would not be accurate data to outline the policies and procedures.

Brian Nyquist, MPH, President and CEO, National Infusion Center Association, addressed the Workgroup requesting that the Board consider prohibiting mandatory use of white bagging and brown bagging.

Dr. Ghazvini addressed the Workgroup regarding other state mandates reiterating some states have banned the regulation as others have developed rules within their practice act.

Dr. Robert Levine, State Advocate Director, Florida Society of Rheumatology, addressed the Workgroup regarding cost effective methods and patients access to care.

Dr. Komorny addressed the Workgroup regarding data collected with Moffit Cancer Center and the proposed the Board review and adopt the suggested language submitted by FSHP.

Dr. Percifield addressed the Workgroup and expressed the possible negative effects of eliminating brown bagging practices. He expressed the prescriber and patient should have the ability to choose which method of receiving their medication is right for them.

Dr. Segovia provided examples of other states implementing procedures for white and brown bagging such as Texas, Colorado, Louisiana, and Massachusetts. She reiterated that per federal regulations the consultant of record (COR) is responsible for the oversight of the preparation and delivery of medication within an institutional setting; therefore, the Board has no jurisdiction over federal regulations.

Dr. Hickman inquired who the responsible party of ensuring the safety of the medication before it is administered lies within and how would a miss fill be captured through an inspection.

Mr. Flynn addressed the Workgroup and conveyed that the Board has not seen complaints from patients regarding white and brown bagging practices. He stated the Board cannot prohibit the patient from choosing what method in which they receive their medications and any proposed regulations would have to be a result of legislative change.

The conversation of the Workgroup ensued regarding patient complaints and safety of the medication.

Dr. Hickman reiterated the Board has no jurisdiction over third party payors and the focus of a rule, if proposed, would strictly be for patient safety.

Mr. Flynn suggested the Workgroup review any proposed language in consultation with additional administrative law judges from other professions from the panel to ensure compliance with regulations among the medical professions.

Mr. Flynn with the assistance of Dr. Hickman will begin drafting rule language to be presented during the December Workgroup meeting.

III. ADJOURNMENT

There being no further business the meeting adjourned at 11:20 a.m.