

[Name]

[Date]

Dear Oregon Board of Pharmacy Members,

I am writing to express my concern and provide feedback about the proposed changes to the Collaborative Drug Therapy Management (CDTM) rules. I am [name or organization name is] strongly opposed to removing all OARs that discuss CDTM and proposed OAR, 855-115-0120. It appears that the Board voted to send these proposed changes to rulemaking for feedback from the public however, changes were not discussed in public comment during either the August or October Board of pharmacy meeting making thorough feedback difficult.

I urge you to use a rules advisory committee to provide feedback on the impact additional rules will have, but especially with the proposed rules for 855-115-0120. I feel/my organization feels there are consequences of removing CDTMs from rules and replacing them with a redefined clinical pharmacy agreement. One implication, though certainly not the least, is the ability of pharmacists to be reimbursed for and thus provide services to Medicaid recipients enrolled in Coordinated Care Organizations (CCOs). In addition, these rules impact pharmacists in all settings, not just community pharmacy. The intent of these rules is unclear, as they have not been discussed and it feels as though the intent is to limit our current scope of practice. Licensees have no idea what the intent of these rules are, because they have not been discussed, and therefore we are unclear if your intent is to limit our current scope of practice or to replace CDTM with something new.

The Oregon Medical Board does not have corresponding rules that recognize a CPA. When these draft rules go into effect, there will be no ability for pharmacists to have a way to collaboratively manage drug therapy. This will greatly affect many of the pharmacists currently working in a clinical environment and could **cause patient harm**. It may also disrupt care for many Oregonians without access to healthcare providers other than their pharmacist and further erode efforts made to address health equity for rural and minority populations in Oregon. Before passing these rules I [or "my organization"] urge you to press pause and let subject matter experts weigh in on what these rule changes will mean for the current practice of pharmacy, the evolution of pharmacy practice, and patient safety.

Thank you,

[Name], Oregon RPh