

GUIDANCE: **EFFECTIVE ADVOCACY WITH YOUR STATE BOARD OF PHARMACY**



Effective advocacy with state boards of pharmacy can have significant payoff for individual pharmacies and for the compounding community as a whole. This guidance will discuss ways to develop your relationship with your state board of pharmacy and position yourself as an effective advocate on compounding issues.

1. Develop your reputation with the board as a trusted resource, not just as an advocate.

Your board members, like anyone, are more inclined to trust and rely on individuals who have a reputation for authenticity, trustworthiness, professionalism, and competence. Ideally, your board members will associate you with all of these traits *before* you need to make an ask or offer a criticism. Becoming a trusted resource provides tangible benefits to the board—credible information about pharmacy compounding. Becoming a resource lets you help shape the narrative around compounding and ensure the board is aware of issues that are important to the compounding community.

One of the best ways to develop your reputation with the board is to attend board meetings regularly. Regular attendance will show that you are interested, engaged, and informed. Take the time to introduce yourself, provide a business card, and explain the nature of your practice. Through regular attendance you will get to know the board members and develop a feel for what concerns them, what their priorities are, and how they approach various issues that arise. Over time, through repeated positive interactions, you can develop a personal relationship with the board members. When you do need to make a request of the board or engage in advocacy, your history of regular attendance at meetings will dispel any impression that you only show up when you need the board to do something for you, or that you are not up to date on the board's activities.

Your presence at board meetings also increases the visibility of the compounding profession as a whole. Remember that your interactions with the board can create a positive or negative impression of compounders. You can make a positive impression by showing that you are oriented towards compliance and dedicated to patient-safety, that you are willing to educate on pharmacy compounding, and that you are eager to work with the board to achieve the best outcomes for patients. Someone who is bitter about FDA overreach (some boards are more sympathetic to this concern than others), who appears resistant to any amount of regulation or enforcement, or who simply complains without helping to create solutions gives a negative impression.

2. In addition to attending board meetings, provide helpful, regular updates to the board.

Remember that the board oversees many types of pharmacies and most board members do not have personal backgrounds in pharmacy compounding. Therefore, it is unlikely that they will be as aware of issues affecting the compounding community as you are. While they may generally be aware of actions by the FDA that affect compounders (e.g., issuance of new Guidance for Industry, trends in inspections and enforcement, or development of the Memorandum of Understanding), you will likely have much deeper knowledge on the details of these actions and a greater ability to identify potential impacts on compounders and patients. Informing the board lets you serve as a useful resource and opens the door to conversations about issues that matter to compounders. Making the board aware of potential issues early will also make it easier for you to seek and receive meaningful guidance from the board, or advocate to the board, because you will not have to educate them from scratch.

Look for ways to create opportunities to be heard at board meetings. Review board meeting agendas in advance and review minutes of board meetings that you were not able to attend. Be on the lookout for proposed rules or rule changes that may not specifically target compounding, but which could still have an impact on your practice (inadvertently or not).

3. Provide regular updates to APC regarding compounding issues being considered by your board of pharmacy.

APC relies on its members who are “on the ground” and directly interacting with boards of Pharmacy to provide information about what is occurring in different states. Keeping APC in the loop allows it to assist with your advocacy efforts. It also provides APC with a big-picture view of current issues raised by states and how different states are reacting to national-level events, regulations, or initiatives.