



KANSAS ACADEMY OF  
FAMILY PHYSICIANS  

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CARING FOR KANSANS

House Health and Human Services Committee  
HB 2082: Allowing pharmacists to administer injectable drugs

February 6, 2019  
(WRITTEN COMMENTS ONLY)

Madam Chair and Committee Members:

Thank you for the opportunity to submit these comments **opposing HB 2082**.

*By its very contents, this bill contemplates effective collaboration between physicians and pharmacists.* Yet, to date, there has been no collaboration between the relevant parties on this legislation. When this bill concept arose in the 2018 session, KAFP subsequently asked the pharmacists' association for an opportunity to discuss it further in order to better understand the perceived need and limitations of the bill. We were told numerous times they would do so and were promised they would send us more information about it. That has not happened, although it was requested by KAFP as recently as the first week of this session.

While the Academy would welcome a comprehensive discussion between physicians and pharmacist to discuss best practices for patient care and safety in this area, we currently stand opposed to the bill for the following reasons:

- Any legislation of this kind should include features that focus, first and foremost, on **patient safety**. To help achieve patient safety, we need to have joint discussions regarding documentation required in the **physician's order** - e.g. medication, dosage, frequency, and follow-up required before next administration, which may include lab testing and reporting of these results to the pharmacists before the next dose is administered.
- **Documentation** of medication administration also needs to be thoroughly examined. **Fragmentation** of healthcare in the United States is one the biggest causes of morbidity and mortality. We need to guarantee proper documentation in a patient's medical record of when a pharmacist administered the medication and also document adverse reactions/side effects that may have occurred.

Before closing, we would like to address the oft-mentioned issue of these kinds of bills being mere "turf battles." That is not KAFP's concern. Rather, KAFP has a long and demonstrated commitment **to advocate strongly for policies and practices that protect patient safety and best ensure healthy outcomes for our patients.**

KAFP continues to welcome the opportunity to collaborate with our pharmacist colleagues on the policy change proposed in HB 2082.

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