



Pharmacy Business Practices Committee – Road Map (Draft #2 –1/7/15)

	Major Stages (May Overlap/Iterate)		Issues (Examples)		Information Sources (Examples)
	A. Problem Identification <ul style="list-style-type: none"> • Issues • Magnitude of Impact/Risk 		<ul style="list-style-type: none"> • Prioritized highest: Workload/ staffing; Rx transfers/solicitations; environment for clinical functions • Also prioritized: business accountability/contributory responsibility; quality improvement expectations • Others: per 8/7/14 meeting or added within scope 		<ul style="list-style-type: none"> • 2014 comments on scope • WA Pharmacy Survey (2014): structured questions, comments • Compliance: inspections, investigations • Published research/analysis • Public comments • Data acquired from QI or other business processes • Other: Welcome help identifying
	B. Review of Current Rules <ul style="list-style-type: none"> • Add to problems: any rule and process deficiencies that impair enforcement of enunciated standards/expectations 		<ul style="list-style-type: none"> • Shared understanding of both safeguards and possible deficiencies in current PQAC rules • What other agency rules (e.g., L&I) have bearing on topics? 		<ul style="list-style-type: none"> • Focused review of rules • Presentations: state lawyers • Committee Q & A • Public comments • Clarifications
	C. Possible Remedies <ul style="list-style-type: none"> • Prescriptive • Quality Improvement • Hybrids and Other 		<ul style="list-style-type: none"> • What types of remedies are in WA rules? Other jurisdictions’ rules? • What other options exist? (e.g., “problem-triggered standards”) 		<ul style="list-style-type: none"> • Other jurisdictions’ rules • Policy literature/ideas related to regulation, safety, quality • Discussion
	D. Drill Down <ul style="list-style-type: none"> • Pros and Cons • Critiques and Adjustments 		<ul style="list-style-type: none"> • What possible remedies will be prioritized based on assessment of relative impact and feasibility? 		<ul style="list-style-type: none"> • Committee deliberation (using available resources) • Public comments
	E. Trial Balloons (“Chunked Out”) <ul style="list-style-type: none"> • Committee-approved concepts • Not rule proposals • Public comment 		<ul style="list-style-type: none"> • How to recognize problems and potential remedies that are ripe for committee to put out for reactions? • Reassuring public this is exploratory 		<ul style="list-style-type: none"> • Committee consideration and analysis (iterative) • Public comment • Refinement of concepts
	F. Integration and Iterative Drafting				
	G. Formal Rule Processes <ul style="list-style-type: none"> • CR-102, SBEIS, CR-103, etc. 		<ul style="list-style-type: none"> • How to stage rules (may be more than one formal proposal) 		

Throughout: Public comment/adjustment