

University of California, San Diego
Skaggs School of Pharmacy and Pharmaceutical Sciences
Intern Pharmacist License Policy

Experiential education is an integral part of the curriculum of the Skaggs School of Pharmacy and Pharmaceutical Sciences. Introductory (IPPE) and Advanced Pharmacy Practice Experiences (APPE) require the student to be actively involved in patient care and to perform the duties of a pharmacist in a variety of environments.

California Pharmacy Law (California Code of Regulations Section 1793.1) states that the only people who may perform the duties of a pharmacist are a licensed pharmacist and a licensed pharmacist intern. There is no allowance made in the law for student pharmacists who are not licensed with the Board of Pharmacy to perform these functions.

In accordance with the California Business and Professions Code and the California Code of Regulations, the following policy is placed into effect.

All students upon matriculation into the School must apply to the California Board of Pharmacy for an Intern Pharmacist License. The applications will be submitted in bulk to the Board through the Office of Student Affairs on a schedule provided to all student pharmacists during their first year orientation. It is the student's responsibility to complete the application and follow up with any subsequent requirements to ensure Board licensure. Upon receipt of the intern pharmacist license from the Board, students must provide a copy of the license to the Office of Student Affairs which will maintain the copy in the student file. Students who do not apply to the Board for an Intern Pharmacist License will be considered in violation of the School's Professionalism Policy and will be subject to disciplinary action, up to and including dismissal from the School.

Students who are denied an Intern Pharmacist License by the Board of Pharmacy, or students whose licenses have been suspended or revoked by the Board, are unable to meet the requirements for completion of the Doctor of Pharmacy degree and are subject to disciplinary action up to and including dismissal. Upon notification of denial, suspension or revocation of an Intern Pharmacist License, the Office of Student Affairs will contact the Board and request the cause for the action. The student will be removed from participation in IPPE or APPE activities until the issue has been resolved. Within 10 working days of receipt of the information from the Board, an ad-hoc committee will be convened. The committee will consist of three members of the faculty, at least two of which shall be members of the faculty who hold pharmacist licenses with the California Board of Pharmacy. The Associate Dean for Student Affairs will be present in a non-voting capacity. The student will be notified of the date and time of the meeting and may elect to present information to the committee but will not be present during deliberations and final determination. If, in the opinion of the committee, the action of the Board is without adequate cause, the School will support the student in an appeal to the Board. If the committee determines that there is adequate cause for the Board action, the student will be suspended or dismissed from the School depending on which action the Board has taken. If the Board has suspended the license, the student will be suspended until such time as the Board reinstates the license. If the Board has denied or revoked a license, the student will be dismissed. The student will be notified in writing within 5 business days of the decision of the committee. Within 5 business days of receipt of a notification, the student may appeal, in writing, to the Dean. The only basis of appeal is the provision of additional information, not previously provided, that may support an appeal to the Board. The Dean will render a decision, in writing, within 10 business days of receipt from the student of the written appeal. The decision of the Dean will be final.

If an appeal of denial, suspension or revocation of a license has been submitted and considered by the Board and denied, the student will accordingly be suspended or dismissed from the School. There will be no appeal of this decision.

Attached to this policy are the pertinent sections of California law:

California Business and Professions Code

Section 480

- (a) A board may deny a license regulated by this code on the grounds that the applicant has one of the following:
- (1) Been convicted of a crime. A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere. Any action that a board is permitted to take following the establishment of a conviction may be taken when the time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal, or when an order granting probation is made suspending the imposition of sentence, irrespective of a subsequent order under the provisions of Section 1203.4 of the Penal Code.
 - (2) Done any act involving dishonesty, fraud, or deceit with the intent to substantially benefit himself or herself or another, or substantially injure another.
 - (3) (A) Done any act that if done by a licentiate of the business or profession in question, would be grounds for suspension or revocation of license.
(B) The board may deny a license pursuant to this subdivision only if the crime or act is substantially related to the qualifications, functions, or duties of the business or profession for which application is made.
- (b) Notwithstanding any other provision of this code, no person shall be denied a license solely on the basis that he or she has been convicted of a felony if he or she has obtained a certificate of rehabilitation under Chapter 3.5 (commencing with Section 4852.01) of Title 6 of Part 3 of the Penal Code or that he or she has been convicted of a misdemeanor if he or she has met all applicable requirements of the criteria of rehabilitation developed by the board to evaluate the rehabilitation of a person when considering the denial of a license under subdivision (a) of Section 482.
- (c) A board may deny a license regulated by this code on the ground that the applicant knowingly made a false statement of fact required to be revealed in the application for the license.

Section 4114. Intern Pharmacist: Activities Permitted

- (a) An intern pharmacist may perform all functions of a pharmacist at the discretion of and under the direct supervision and control of a pharmacist whose license is in good standing with the board.
- (b) A pharmacist may not supervise more than two intern pharmacists at any one time.

Section 4208. Intern Pharmacist License

- (a) At the discretion of the board, an intern pharmacist license may be issued for a period of:
- (1) One to six years to a person who is currently enrolled in a school of pharmacy recognized by the board.
 - (2) Two years to a person who is a graduate of a school of pharmacy recognized by the board and who has applied to become licensed as a pharmacist in California.
 - (3) Two years to a foreign graduate who has met educational requirements described in paragraphs (1) and (2) of subdivision (a) of Section 4200.
 - (4) One year to a person who has failed the pharmacist licensure examination four times and has reenrolled in a school of pharmacy to satisfy the requirements of Section 4200.1.
- (b) The board may issue an intern pharmacist license to an individual for the period of time specified in a decision of reinstatement adopted by the board.
- (c) An intern pharmacist shall notify the board within 30 days of any change of address.
- (d) An intern pharmacist whose license has been issued pursuant to paragraph (1) or (4) of subdivision (a) shall return his or her license, by registered mail, within 30 days of no longer being enrolled in a school of pharmacy. The intern pharmacist license shall be canceled by the board. Notwithstanding subdivision (c), an intern pharmacist license may be reinstated if the student reenrolls in a school of pharmacy recognized by the board to fulfill the education requirements of paragraphs (1) to (4), inclusive, of subdivision (a) of Section 4200.
- (e) A person who has not completed the experience requirements necessary to be eligible for the licensure examination may have his or her intern license extended for a period of up to two years at the discretion of the board if he or she is able to demonstrate his or her inability to exercise the privileges of the intern license during the initial license period.

California Code of Regulations

Section 1793.1. Duties of a Pharmacist.

Only a pharmacist, or an intern pharmacist acting under the supervision of a pharmacist, may:

- (a) Receive a new prescription order orally from a prescriber or other person authorized by law.
- (b) Consult with a patient or his or her agent regarding a prescription, either prior to or after dispensing, or regarding any medical information contained in a patient medication record system or patient chart.
- (c) Identify, evaluate and interpret a prescription.
- (d) Interpret the clinical data in a patient medication record system or patient chart.
- (e) Consult with any prescriber, nurse or other health care professional or authorized agent thereof.
- (f) Supervise the packaging of drugs and check the packaging procedure and product upon completion.

(g) Perform all functions which require professional judgment.

Authority cited: Sections 4005, 4007, 4038, 4115 and 4202, Business and Professions Code. Reference: Sections 4005, 4007, 4038, 4115 and 4202, Business and Professions Code.