

# House of Delegates

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## REPORT OF THE COMMITTEE ON RESOLUTIONS

June 9, 2019

Boston, Massachusetts

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Article 7.2.2.1 of the ASHP Rules of Procedure for the House of Delegates states:

Resolutions not voluntarily withdrawn by the submitter that meet the requirements of the governing documents shall be presented to the House of Delegates by the Committee on Resolutions at the first meeting and acted upon at the second meeting. They shall be submitted to delegates with one of the following recommendations: (a) recommend adoption, (b) do not recommend adoption, (c) recommend referral for further study, or (d) presented with no recommendation of the Committee on Resolutions.

Action by the House of Delegates shall be on the substance of the resolutions and not on the recommendation of the Committee on Resolutions.

Pursuant to the above article, the Committee on Resolutions presents the attached resolution to the House of Delegates. The recommendation of the Committee is to **adopt the resolution**. The Committee supports the substance of the resolution, which is to oppose the Office of Personnel Management (OPM) [Classification and Qualifications - General Schedule Qualification Standard - Pharmacy Series, 0660](#) requirement of a Doctor of Pharmacy or Doctor of Philosophy degree as a minimum qualification to practice pharmacy in the federal service. ASHP policy aligns with the minimum education standards of all state boards of pharmacy, which do not distinguish between entry-level degrees (e.g., B.S.Pharm., Pharm.D., and various non-U.S. degrees). The Committee recognizes that according to the 2014 National Pharmacist Workforce Study, only 38% of pharmacists have earned a Pharm.D., and that the OPM requirement would not only limit the career options of B.S.Pharm.-degreed pharmacists but could also present a challenge to building a strong federal pharmacist workforce.

The Committee understands that limiting the policy's language to the specific OPM requirement could create a gap in ASHP policy when addressing similar actions by other nonlicensing agencies. The Board of Directors has asked the appropriate ASHP councils to explore potential broader policy on the topic.

Delegates are reminded that they are voting on the substance of the resolution, which is approval of the motion as follows:

To support minimum educational qualification standards for pharmacists to practice pharmacy that are consistent with the licensing standards of state boards of pharmacy; further,

To oppose the basic education requirement within the Office of Personnel Management Classification & Qualifications - General Schedule Qualification Standards - Pharmacy Series, 0660, requiring a Doctor of Pharmacy or Doctor of Philosophy degree as the minimum qualification to practice pharmacy.

The options for House action on the resolution, to be taken at the second meeting, are to (a) approve the motion (**the option recommended by the Committee on Resolutions**); (b) defeat the motion; (c) refer the motion for further study by a committee or task force to be determined by the Board of Directors; or (d) amend the resolution, which would then require due consideration by the Board of Directors at its next meeting in September.

## Resolution for 2019 ASHP House of Delegates: Minimum Educational Qualification Standards for Pharmacists

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### Subject: Minimum Educational Qualification Standards for Pharmacists

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### Motion

To support minimum educational qualification standards for pharmacists to practice pharmacy that are consistent with the licensing standards of state boards of pharmacy; further,

To oppose the basic education requirement within the Office of Personnel Management Classification & Qualifications - General Schedule Qualification Standards - Pharmacy Series, 0660, requiring a Doctor of Pharmacy or Doctor of Philosophy degree as the minimum qualification to practice pharmacy.

### Background

In September 2017, the U.S. Office of Personnel Management (OPM) issued a new [qualification standard](#) for pharmacists, GS-0660. The new standard lists the basic educational requirement for pharmacists as a Doctor of Pharmacy (Pharm.D.) or Doctor of Philosophy (Ph.D.) degree. To set this requirement, OPM must have determined that pharmacy cannot be performed by persons without one of these degrees, because [Title 5 U.S.C. 3308](#) permits the establishment of minimum educational requirements only when OPM has determined that the work cannot be performed by persons who do not possess the prescribed minimum education.

All 50 states currently allow pharmacists with a bachelor's degree in pharmacy (B.S.Pharm.) to obtain licensure and practice pharmacy, which indicates that all state legislatures or regulators have concluded that pharmacists with a B.S.Pharm. degree can practice pharmacy safely and effectively. In the U.S., the B.S.Pharm. degree was awarded until 2005; in 2006, the Pharm.D. degree became the only entry-level degree awarded. A 2014 survey of the pharmacy workforce found that only 40% of pharmacists had earned a Pharm.D. The minimum educational requirements set by OPM would automatically disqualify 60% of pharmacists from entering the federal government workforce, an inequitable practice not seen outside the federal sector. The OPM minimum educational requirement also creates a monumental challenge to building and maintaining the pharmacist workforce the Department of Defense needs to support U.S. warfighting efforts and take care of veterans. ASHP recognizes that pharmacists must possess the education, training, and experience required to effectively, efficiently, and responsibly fulfill their roles. Further, ASHP supports licensure by a state

board of pharmacy as the minimum requirement for pharmacy practice in its [Minimum Standard for Pharmacies in Hospitals](#).

**Suggested Outcome**

For ASHP to support minimum educational qualification standards for pharmacists to practice pharmacy that are consistent with the licensing standards of state boards of pharmacy. Further, for ASHP to oppose the basic education requirement within the Office of Personnel Management Classification & Qualifications - General Schedule Qualification Standards - Pharmacy Series, 0660, requiring a Doctor of Pharmacy or Doctor of Philosophy degree as the minimum qualification to practice pharmacy.