

ICHP Position Statement on the Standard of Care Regulatory Model for Pharmacists

Statement of Support

ICHP supports a Standard of Care (SOC) Regulatory Model for Illinois pharmacists and urges policymakers, the Illinois Department of Finance and Professional Regulation (IDFPR) in conjunction with Board of Pharmacy to adopt the following:

- (1) Regulate pharmacy practice using a standard of care regulatory model, enabling pharmacists to adapt to new clinical practices and technologies without needing legislative or regulatory updates.
- (2) Eliminate unnecessary restrictive regulations that limit professional judgement.
- (3) Codify standard of care in law emphasizing pharmacist responsibility for positive clinical outcomes and autonomous decision-making.
- (4) Encourage the State legislature to provide the Board of Pharmacy with adequate resources, autonomy, and assistance in adopting a standard of care model for pharmacist practice.
- (5) Require pharmacists providing SOC services to deliver care consistent with what a reasonable and prudent pharmacist with comparable education, training, and experience would provide in a similar setting, aligning with standards applied to other healthcare providers under current nursing and physician practice acts.

Rationale

Current accreditation standards for pharmacy education ensure that pharmacists are prepared to provide direct patient care, manage many common chronic diseases, decrease unnecessary emergency room visits, hospitalizations and deliver preventative care.¹

More than 30% of Americans do not have a primary health care provider, but most live within 5 miles of a community or health system pharmacy, where a pharmacist with the education, training, and experience can effectively provide such care and can potentially expand timely access to health care for some patients.

Almost all state boards of pharmacy in the United States employ a Bright Line regulatory model for pharmacists.² A Bright Line regulatory model, also known as a prescriptive or rule-based regulatory model is characterized by: (a) well-defined allowable practices, leaving little room for professional discretion; (b) a punitive culture of enforcement by state

boards of pharmacy focused on administrative and technical violations; (c) a tendency to restrict innovation within a pharmacist's practice; (d) failure to allow pharmacists to practice using their clinical expertise; and (d) a scope of practice for pharmacists based on the lowest clinical ability of any pharmacist in the state.

In Illinois, the professions of nursing, medicine, dentistry, and veterinary medicine employ a 'Standard of Care' regulatory model allowing practice based on national clinical guidelines, professional judgment, and evolving medical standards. Furthermore, SOC enables their practices to evolve rapidly with medical advancements without constant regulatory updates. Finally, SOC allows health professionals to practice to the top of their education, training and experience.

Currently, several states have adopted a Standard of Care regulatory model, i.e. Iowa, Idaho and California.³

The National Association of Boards of Pharmacy,⁴ American Society of Health System Pharmacists (in its proposed model pharmacy act on comprehensive medication management),¹ and American Pharmacists Association,⁵ endorse the Standard of Care regulatory model for pharmacists.

Some state boards have aligned pharmacist practice authority to collaborative practice agreements, physician-approved protocols, or standing orders of physicians. However, such methods are extensions of the Bright Line regulatory model.⁶

Definitions

Standard of Care (National Association of Boards of Pharmacy):⁷

"The degree of care a prudent and reasonable licensee or registrant with similar education, training and experience will exercise under similar circumstances."

Bright Line:³

A clear, unambiguous rule or standard that dictates specific actions and prohibits specific behaviors, often leaving little room for interpretation.

References

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4. National Association of Boards of Pharmacy. Report of the Task Force to Develop Regulations Based on Standards of Care. Available at: [Task-Force-to-Develop-Regulations-Based-on-Standards-of-Care-December-2018-1.pdf](#). (accessed 12/23/2025)
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