(14)(A) "Practice of pharmacy" means:

(vi) the providing of patient care services **within the pharmacist's scope of practice as authorized by statute or rule**;
(vii) the optimizing of drug therapy through the practice of clinical pharmacy; and

The concern VMS is working to address here is that "providing of patient care services" is very broad. VMS is concerned that this language could authorize pharmacists to prescribe medication, change medication, or change dosage without collaboration with or notice to the medical home or prescribing physician.

(B) "Practice of clinical pharmacy" means:
(i) the health science discipline in which, in conjunction with the patient's other practitioners, a pharmacist provides patient care to optimize medication therapy and to promote disease prevention and the patient's health and wellness;
(ii) the provision of patient care services **within the pharmacist's scope of practice as authorized by law or rule**, including medication therapy management, comprehensive medication review, post-diagnostic disease state management services, and
(iv) the practice of pharmacy by a pharmacist pursuant to a clinical pharmacy agreement.

or

(ii) the provision of patient care services including medication therapy management, comprehensive medication review,
(iii) **the provision of** post-diagnostic disease state management services, **pursuant to a clinical pharmacy agreement**; and

The concern here is that "post-diagnostic disease state management services" is very broad. VMS is concerned that this language could authorize things like changing a medication or changing a dose without collaboration with or notice to the medical home or prescribing physician.

(19) "Clinical pharmacy agreement" means **a written** agreement between a pharmacist and a health care **facility** or **prescribing** practitioner that permits the pharmacist to engage in the practice of clinical pharmacy for the benefit of the entity's or practitioner's patients.

The idea here is to be sure the prescriber is in the loop, which could also be accomplished by a notice provision.