



State of California—Health and Human  
Services Agency  
**California Department of  
Public Health**



**GAVIN NEWSOM**  
Governor

January 18, 2023

AFL 23-03

**TO:** Hospice Facilities (HOFA)  
Skilled Nursing Facilities (SNF)  
Intermediate Care Facilities (ICF)

**SUBJECT:** Assembly Bill (AB) 1852 – Automated Drug Dispensing Systems

**AUTHORITY:** Health and Safety Code (HSC) Section 1261.6

### **All Facilities Letter (AFL) Summary**

This AFL notifies all HOFAs, SNFs, and ICFs of the chaptering of AB 1852 (Chapter 111, Statutes of 2022), expanding current authorization for use of automated drug dispensing systems (ADDS) to include automated unit dose systems (AUDS) and allowing HOFAs to use either an ADDS or AUDS.

Effective January 1, 2023, AB 1852 adds AUDS to the types of ADDS that authorized licensed health care facilities may use to store and distribute patient drugs. This bill also adds HOFAs to the licensed health care facilities allowed to use an ADDS or AUDS. An ADDS is a mechanical system that stores, dispenses, or distributes drugs and collects, controls, and maintains all transaction information to accurately track the movement of drugs into and out of the system for security, accuracy, and accountability. An AUDS is a type of ADDS that dispenses the patient's drugs in individual doses.

This bill includes HOFAs in the current requirement for SNFs and ICFs intending to use an ADDS that allows licensed personnel to have access to multiple drugs and is not patient-specific in its design to notify the Center for Health Care Quality (CHCQ) of its intent prior to the use of the ADDS. Facilities intending to use an ADDS must have approval from the California Board of Pharmacy and contact the Center for Health Care Quality (CHCQ), Pharmaceutical Consultant Section at LNC-PHARM-Consult@cdph.ca.gov.

CHCQ reviews the facility's medication training, storage, security, and administration procedures related to its use of an ADDS to ensure that adequate staff training and safeguards are in place. If a facility does not comply with applicable statutes and regulations, CHCQ may revoke the facility's ADDS authorization.

CDPH's failure to expressly notify facilities of statutory or regulatory requirements does not relieve facilities of their responsibility for following all laws and regulations. Facilities should refer to the full text of all applicable sections of the HSC and the California Code of Regulations to ensure compliance.

If you have questions or concerns regarding this AFL, please contact CHCQ, Pharmaceutical Consultant Section at LNC-PHARM-Consult@cdph.ca.gov.

Sincerely,

**Original signed by Cassie Dunham**

Cassie Dunham

Deputy Director

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