PHARMACY QUALITY ASSURANCE COMMISSION

Date: **December 14, 2018**

To: **Pharmacy Quality Assurance Commission**

From: **Steven Saxe, Executive Director**

Subject: **PQAC Meeting Correspondence – December 2018 Meeting**

NABP Program Information for NAPLEX, MPJE, and e-LTP Applicants memo – This memo suggests Boards (Commissions) refer applicants to the NABP website for exam or applications questions rather than develop their own websites. This reduces problems with keeping individual state websites up to date if there are changes.

Armed Forces Waivers and Discounts, NABP Memo – This memo provides information about discounts being offered to members of the Armed Forces and their spouses.

Physician Concern Memo – Redacted email from a physician with general concerns regarding prescribing and electronic prescribing.

GovDelivery Email Notice of Epidiolex Status – A copy of the email distribution sent to all pharmacists and shared with the prescriber licensing boards and commissions on the status of Epidiolex, current DEA status as schedule V drug and the intent of WA to place in C-V after a probable hearing at the December meeting.

GovDelivery Email on Rulemaking (DOH Fee Changes/CR-101 Withdrawals) – A copy of the email distribution sent regarding the DOH Fee Changes to pharmacy related licenses effective January 1, 2019 and the notices of the rulemaking preproposal statement of Inquiry withdrawals.

Safety in the Retail Pharmacy – Gordon MacDonald, Pharmacist Inspector Supervisor shared the link to this article on the Agency for Healthcare Research and Quality. This might provide some information as we continue on our rule re-write project. Safety in the Retail Pharmacy

A Prescriber's Guide to the New Medicare Part D Opioid Overutilization Policies for 2019 – This link was provided by the Centers for Medicare & Medicaid Services. https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/SE18016.pdf

NABP Memo on Purchasing NAPLEX or MPJE – This memo explains changes in the NABP process for purchasing and sitting for the exams.

DRAFT

NABP
National Association of Boards of Pharmacy
www.nabp.pharmacy

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Mount Prospect, IL 60056
T) 847/391-4406
F) 847/375-1114

TO: EXECUTIVE OFFICERS – STATE BOARDS OF PHARMACY

FROM: Bill Cover, Member Relations and Government Affairs Director

DATE: October 25, 2018

RE: NABP Program Information for NAPLEX, MPJE, and e-LTP Applicants

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Since the launch of the new e-Profile system in April 2018, the National Association of Boards of Pharmacy (NABP) has received requests to provide text explaining changes to affected programs so that it can be posted on board of pharmacy websites. We at NABP appreciate that we have an engaged membership that is committed to providing licensees with the information they are seeking. However, we highly recommend that board of pharmacy staff as well as any application guidance or FAQs posted on the board's website direct applicants to visit the NABP website for all information regarding NABP programs. We feel this approach will provide several benefits for you and your board's staff.

Directing applicants for the North American Pharmacist Licensure Examination (NAPLEX), the Multistate Pharmacy Jurisprudence Examination (MPJE), and the Electronic Licensure Transfer Program (e-LTP) to the NABP website for information on current processes and fees ensures that:

1. Board staff will not need to stay up to date on all NABP program details and updates.

2. Board staff will not have the added responsibility of coordinating website and document updates.

3. Applicants will always have access to correct information about NABP programs, thereby reducing the potential for confusion. In addition, applicants will be alerted to any upcoming changes to NABP programs.

Where appropriate, please refer people to either the home page of the NABP website *(www.nabp.pharmacy)* or the Programs page *(www.nabp.pharmacy/programs).* The home page includes links to the most commonly used programs and the Programs page contains links to every program that NABP offers.

We hope that this suggestion works for your board and makes it easier to provide NABP-related information to licensees in your state. If you have any questions or need any assistance with identifying areas where such a change can be implemented effectively, please contact me via email at wcover@nabp.pharmacy or via phone at 224/565-5694.

cc: NABP Executive Committee

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TO: EXECUTIVE OFFICERS – STATE BOARDS OF PHARMACY

FROM: Carmen A. Catizone, Executive Director/Secretary

DATE: October 25, 2018

RE: Armed Forces Waivers and Discounts

This memo is to inform the board executive directors about the armed forces waivers and discounts that NABP offers for its programs.

Members of the United States Armed Forces and their spouses can obtain discounts for the North American Pharmacist Licensure Examination (NAPLEX), the Multistate Pharmacy Jurisprudence Examination (MPJE), and/or the Electronic Licensure Transfer Program (e-LTP). Qualifying individuals include members (reserve, active, or inactive) of the US Armed Forces and their spouses. Individuals who are no longer serving must have received an honorable discharge to be eligible for the discount. The program discounts are as follows:

NAPLEX:
Active members, reserves, and veterans of the armed forces will receive a 100% discount on the NAPLEX application and examination fees, and their spouses will receive a 50% discount on the fees. Fees for repeat attempts and resitting fees are not be waived or discounted.

MPJE:
NABP offers one-time discounts per jurisdiction for members of the armed forces and their spouses. Active members, reserves, and veterans of the armed forces will receive a 100% discount on the application and examination fees, and their spouses will receive a 50% discount on the fees. Discounts may be applied once to every jurisdiction that the individual is testing for. Discounts are not waived or discounted for repeat attempts or resitting fees.

e-LTP:
NABP offers discounts to members of the armed forces and their spouses for e-LTP. Active members, reserves, and veterans of the armed forces will receive an unlimited number of complimentary licensure transfers. Their spouses will receive a 50% discount on the application fee and a 50% discount on the fee for each additional state.

Members, reserves, veterans, and spouses of the following branches are eligible to request the waiver or discount:

- US Army
- US Navy
- US Air Force
- US Marine Corps
- US Coast Guard
- National Guard

If deployed to any of the five branches of the US Armed Forces, officers in the Commissioned Corp of the Public Health Service are also eligible for this discount (effective as of October 1, 2018).

Applicants are instructed to apply for the waiver or discount by logging into their NABP e-Profile and selecting the Armed Forces Discount tile. Supporting documentation is required and verified by NABP prior to approving the discount.

Any questions on the armed forces discount may be sent via email to ExecOffice@nabp.pharmacy.

cc: NABP Executive Committee

From: Physician
Sent: Wednesday, October 10, 2018 10:46 AM
To: DOH WSPQAC <WSPQAC@doh.wa.gov>
Subject: Input for policy making on dispensing of controlled substances

Greetings,

I recently talked with one of your investigators about a complaint XXXXXXXXXXXXXXXXX. It raised some larger policy issues that the investigator suggested I share with you.

In the current climate of heavy regulation of the prescribing of controlled substances, it has fallen on physicians to mitigate much of the risk associated with their use. To that end, prescribers like myself put instructions on our prescriptions (I do exclusively electronic prescribing) to guide the pharmacies as to how and when to fill. While most pharmacies follow those instructions and call to clarify when there is any question, I have come across a few situations where the actions of the pharmacy are in direct contradiction to my efforts to control the timing of prescription fills.

Unauthorized early fills: Some pharmacies have policies that allow the pharmacists to fill controlled substances up to 2 days before they are due if insurance approves payment. If the prescriber specifies a particular fill date, they are not supposed to dispense prior to that date regardless of insurance payment, but I have had cases where the pharmacy either did not see or ignored the fill date and filled early. As you can imagine, this is a problem for me and my patients where having their medications a couple of days early can mean that they lose track of when they are due and are tempted to overuse, or just get off schedule in general.

In my case, to avoid any questions, unless the medication is to be filled the date of the prescription, I always put a fill date on the prescription.

I have called and spoken with pharmacists in cases where they have filled too early, and ended up speaking with district managers as well to clarify the policy, and it seems that in some cases the stores are not following their own company's policy.

Another problem that has come up that is technical in nature is that the electronic prescribing systems, Surescripts, and the pharmacy software systems do not appear to be standardized together in terms of how many characters are allowed in the "note" section which is where I send instructions to the pharmacy. In some cases, after putting in all of the required information such as "EXEMPT: Chronic Pain Management" and the diagnoses, sometimes the fill date is cut off on the pharmacy's end. While this is not a problem for you only at the state level, since it involves Surescripts and software providers that serve the whole country, I wanted to raise this issue in case it wasn't already on your radar so that you are aware there needs to be advocacy for greater standardization of information exchange between these various players. I would hope that this is an area already under discussion nationally, but I wanted to give you the perspective of a prescribing physician in terms of how the lack of standardization, combined with increasing requirements for all kinds of documentation on the prescription are clashing to create an unsafe situation.

I hope that this information is helpful to you. Feel free to contact me if you have any questions.

Best,

IMPORTANT INFORMATION

Attention: Washington Pharmacists, Pharmacies, and Prescribers

Subject: Epidiolex Status

Key Messages:

- Epidiolex is considered a legend drug in Washington state and requires a prescription.
- Epidiolex is not currently scheduled as a controlled substance in Washington state.
- The Pharmacy Quality Assurance Commission is proposing to place Epidiolex in Schedule V. We anticipate a public hearing and commission decision on updating the controlled substances rules, chapter 246-887 WAC, at the December 13, 2018, commission business meeting.
- Epidiolex is scheduled federally as a controlled substance (C-V) by the Drug Enforcement Administration (DEA) so prescribers need to be registered appropriately with the DEA.

Background:

On June 25, 2018, the US Food and Drug Administration announces the approval of a cannabidiol oral solution for the treatment of seizures associated with severe forms of epilepsy. Then on September 28, 2018, the DEA announced that following its review of this new product approval by the FDA they had placed this product into Schedule V.

The product, Epidiolex (cannabidiol), is used for the treatment of two rare and severe forms of epilepsy, Lennox-Gastaut syndrome and Dravet syndrome in patient two years of age and older. Additional information can be found on the FDA website in the announcement: "FDA approves first drug comprised of an active ingredient derived from marijuana to treat rare, severe forms of epilepsy."

Following that announcement approving the drug, the DEA evaluated the drug to determine the appropriate scheduled based on its addictive properties and approved medical use. The DEA announcement can be found on the DEA website: "Schedules of Controlled Substances: Placement in Schedule V of Certain FDA-Approved Drugs Containing Cannabidiol; Corresponding Change to Permit Requirements".

RULE-MAKING ORDER
PERMANENT RULE ONLY

CR-103P (December 2017)
(Implements RCW 34.05.360)

CODE REVISER USE ONLY

OFFICE OF THE CODE REVISER
STATE OF WASHINGTON
FILED

DATE: October 18, 2018
TIME: 10:17 AM

WSR 18-21-123

Agency: Department of Health

Effective date of rule:

Permanent Rules

☐ 31 days after filing.

☒ Other (specify) 01/01/2019 **(If less than 31 days after filing, a specific finding under RCW 34.05.380(3) is required and should be stated below)**

Any other findings required by other provisions of law as precondition to adoption or effectiveness of rule?

☐ Yes ☒ No If Yes, explain:

Purpose: WAC 246-907-030 Pharmaceutical licensing fees and renewal cycle; 246-907-0301 Pharmacy assistant licensing periods-Fees and renewal cycle; and 246-907-0302 Hospital pharmacy associated clinics fees and renewal cycle. The adopted rules increase application and renewal fees for many of the pharmacy profession and pharmaceutical firm credentials to generate additional revenue to recover from the current budget deficit and align program revenue and expenditures. The adopted fees also include a few fee decreases to simplify the fee schedule, and changes to fees for duplicate credentials, verification of credentials, and late renewal penalties to align them with standards for all health professions. In addition, the adopted rules repeal WAC 246-907-0301, pharmacy assistant fees, and moves them to WAC 246-907-030 with the other pharmacy professions.

Citation of rules affected by this order:

New: None
Repealed: WAC 246-907-0301
Amended: WAC 246-907-030 and 246-907-0302
Suspended: None

Statutory authority for adoption: RCW 43.70.250

Other authority: RCW 43.70.280, chapter 18.64 RCW, and chapter 18.64A RCW

PERMANENT RULE (Including Expedited Rule Making)

Adopted under notice filed as WSR 18-16-075 on 07/30/2018 (date).

Describe any changes other than editing from proposed to adopted version: None

If a preliminary cost-benefit analysis was prepared under RCW 34.05.328, a final cost-benefit analysis is available by contacting:

Name:
Address:
Phone:
Fax:
TTY:
Email:
Web site:
Other:

Note: If any category is left blank, it will be calculated as zero. No descriptive text.

Count by whole WAC sections only, from the WAC number through the history note. A section may be counted in more than one category.

The number of sections adopted in order to comply with:

Federal statute:	New	0	Amended	0	Repealed	0
Federal rules or standards:	New	0	Amended	0	Repealed	0
Recently enacted state statutes:	New	0	Amended	0	Repealed	0

The number of sections adopted at the request of a nongovernmental entity:

	New	0	Amended	0	Repealed	0

The number of sections adopted in the agency's own initiative:

	New	0	Amended	2	Repealed	0

The number of sections adopted in order to clarify, streamline, or reform agency procedures:

	New	0	Amended	0	Repealed	1

The number of sections adopted using:

Negotiated rule making:	New	0	Amended	0	Repealed	0
Pilot rule making:	New	0	Amended	0	Repealed	0
Other alternative rule making:	New	0	Amended	2	Repealed	1

Date Adopted: 10/16/2018	**Signature:**
Name: John Wiesman, DrPH, MPH	
Title: Secretary of Health	

AMENDATORY SECTION (Amending WSR 16-18-087, filed 9/6/16, effective 10/7/16)

WAC 246-907-030 Pharmaceutical licensing ((~~periods and fees~~)) fees and renewal cycle. (1) Pharmacist, pharmacy technician, ((~~and~~)) pharmacy intern ((~~licenses~~)), and pharmacy assistant credentials must be renewed every year on the practitioner's birthday as provided in chapter 246-12 WAC, Part 2.

(2) Pharmacy location((~~, controlled substance registration (pharmacy)~~)) credentials, controlled ((~~Substances Act~~)) substance researcher registration, ((~~pharmacy technician utilization, and shopkeepers differential hours licenses~~)) drug dog handler K9 registration, and other Controlled Substances Act registrations will expire on June 1st of each year.

(3) All other ((~~licenses~~)) credentials, including health care entity ((~~licenses, registrations, permits, or certifications~~)), will expire on October 1st of each year, except the shopkeeper endorsement which expires annually associated with a business license issued by the department of revenue.

(4) The following nonrefundable fees will be charged for pharmacy ((~~location~~)) professionals:

((~~Title of fee~~	~~Fee~~
~~Original pharmacy fee~~	~~$370.00~~
~~Original pharmacy technician utilization fee~~	~~65.00~~
~~Renewal pharmacy fee~~	~~405.00~~
~~Renewal pharmacy technician utilization fee~~	~~75.00~~
~~Penalty pharmacy fee~~	~~205.00~~

~~(5) The following nonrefundable fees will be charged for vendor:~~

~~Original fee~~	~~75.00~~
~~Renewal fee~~	~~75.00~~
~~Penalty fee~~	~~50.00~~

~~(6) The following nonrefundable fees will be charged for pharmacist:~~

~~Original license fee~~	~~145.00~~
~~Renewal fee, active and inactive license~~	~~190.00~~
~~Renewal fee, retired license~~	~~25.00~~
~~Penalty fee~~	~~100.00~~
~~Expired license reissuance (active and inactive)~~	~~90.00~~
~~Reciprocity fee~~	~~335.00~~
~~Certification of license status to other states~~	~~30.00~~
~~Retired license~~	~~25.00~~
~~Temporary permit~~	~~65.00~~

~~(7) The following nonrefundable fees will be charged for shopkeeper:~~

~~Original fee~~	~~40.00~~
~~Renewal fee~~	~~40.00~~

~~Penalty fee~~	~~40.00~~
~~Shopkeeper - With differential hours:~~	
~~Original fee~~	~~35.00~~
~~Renewal fee~~	~~35.00~~
~~Penalty fee~~	~~35.00~~

~~(8) The following nonrefundable fees will be charged for drug manufacturer:~~

~~Original fee~~	~~590.00~~
~~Renewal fee~~	~~590.00~~
~~Penalty fee~~	~~295.00~~

~~(9) The following nonrefundable fees will be charged for drug wholesaler - Full line:~~

~~Original fee~~	~~590.00~~
~~Renewal fee~~	~~590.00~~
~~Penalty fee~~	~~295.00~~

~~(10) The following nonrefundable fees will be charged for drug wholesaler - OTC only:~~

~~Original fee~~	~~330.00~~
~~Renewal fee~~	~~330.00~~
~~Penalty fee~~	~~165.00~~

~~(11) The following nonrefundable fees will be charged for drug wholesaler - Export:~~

~~Original fee~~	~~590.00~~
~~Renewal fee~~	~~590.00~~
~~Penalty~~	~~295.00~~

~~(12) The following nonrefundable fees will be charged for drug wholesaler - Export nonprofit humanitarian organization.~~

~~Original fee~~	~~25.00~~
~~Renewal fee~~	~~25.00~~
~~Penalty~~	~~25.00~~

~~(13) The following nonrefundable fees will be charged for pharmacy technician:~~

~~Original fee~~	~~60.00~~
~~Renewal fee~~	~~50.00~~
~~Penalty fee~~	~~50.00~~
~~Expired license reissuance~~	~~50.00~~

~~(14) The following nonrefundable fees will be charged for pharmacy intern:~~

~~Original registration fee~~	~~30.00~~
~~Renewal registration fee~~	~~30.00~~

~~(15) The following nonrefundable fees will be charged for Controlled Substances Act (CSA):~~

~~Registrations~~	
~~Dispensing registration fee (i.e., pharmacies and health care entities)~~	~~80.00~~

~~Dispensing renewal fee (i.e., pharmacies and health care entities)~~	~~65.00~~
~~Distributors registration fee (i.e., wholesalers)~~	~~115.00~~
~~Distributors renewal fee (i.e., wholesalers)~~	~~115.00~~
~~Manufacturers registration fee~~	~~115.00~~
~~Manufacturers renewal fee~~	~~115.00~~
~~Sodium pentobarbital for animal euthanization registration fee~~	~~40.00~~
~~Sodium pentobarbital for animal euthanization renewal fee~~	~~40.00~~
~~Researchers registration fee~~	~~400.00~~
~~Researchers renewal fee~~	~~400.00~~
~~Other CSA registrations~~	~~40.00~~

~~(16) The following nonrefundable fees will be charged for legend drug sample - Distributor:~~

~~Registration fees~~	
~~Original fee~~	~~365.00~~
~~Renewal fee~~	~~265.00~~
~~Penalty fee~~	~~135.00~~

~~(17) The following nonrefundable fees will be charged for poison manufacturer/seller - License fees:~~

~~Original fee~~	~~40.00~~
~~Renewal fee~~	~~40.00~~

~~(18) The following nonrefundable fees will be charged for facility inspection fee:~~

~~200.00~~

~~(19) The following nonrefundable fees will be charged for precursor control permit:~~

~~Original fee~~	~~65.00~~
~~Renewal fee~~	~~65.00~~

~~(20) The following nonrefundable fees will be charged for license reissue:~~

~~Reissue fee~~	~~30.00~~

~~(21) The following nonrefundable fees will be charged for health care entity:~~

~~Original fee~~	~~365.00~~
~~Renewal~~	~~265.00~~
~~Penalty~~	~~135.00~~))

(a) All pharmacy professionals:

Title of fee	**Fee**
Verification of credential	$25.00
Duplicate credential	10.00

(b) Pharmacist:

Original credential	$200.00
Renewal	265.00
Late renewal penalty	135.00
Expired credential reissuance	265.00
Inactive credential renewal	265.00
Retired credential application	25.00
Retired credential renewal	25.00
Temporary permit	100.00
Reciprocity	465.00

(c) Pharmacy technician:

Original credential	$70.00
Renewal	70.00
Late renewal penalty	50.00
Expired credential reissuance	70.00

(d) Pharmacy intern:

Original credential	$45.00
Renewal	45.00
Late renewal penalty	45.00
Verification of internship hours	25.00
Expired credential reissuance	45.00

(e) Pharmacy assistant:

Original credential	$35.00
Renewal	35.00
Late renewal penalty	35.00
Expired credential reissuance	35.00

(5) The following nonrefundable fees will be charged for pharmaceutical firms:

(a) All pharmaceutical firms:

Verification of credential	$25.00
Duplicate credential	10.00
Facility inspection	400.00

(b) Pharmacy (includes hospital pharmacies):

Pharmacy credential (for hospital pharmacy associated clinics, see WAC 246-907-0302)	
Original credential	$540.00
Renewal	540.00
Late renewal penalty	270.00
Pharmacy technician utilization	
Original utilization	100.00
Renewal	100.00
Controlled substances authority	
Original credential	150.00
Renewal	150.00
With differential hours	
Original credential	55.00
Renewal	55.00

(c) Nonresident pharmacy:

Pharmacy credential	
Original credential	$540.00
Renewal	540.00
Late renewal penalty	270.00
Controlled substances authority	
Original credential	150.00
Renewal	150.00

(d) Controlled substance researcher:

Original credential	$400.00
Renewal	400.00

(e) Other controlled substances act registrations (i.e., analytical laboratories, school laboratories):

Original credential	$360.00
Renewal	360.00

(f) Drug dog handler K9 registration:

Original credential	$55.00
Renewal	55.00

(g) Health care entity:

Health care entity credential	
Original credential	$540.00
Renewal	540.00
Late renewal penalty	270.00
Controlled substances authority	
Original credential	150.00
Renewal	150.00

(h) Drug manufacturer:

Manufacturer credential	
Original credential	$825.00
Renewal	825.00
Late renewal penalty	300.00
Controlled substances authority	
Original credential	150.00
Renewal	150.00

(i) Drug wholesaler – Full line:

Wholesaler credential	
Original credential	$825.00
Renewal	825.00
Late renewal penalty	300.00
Controlled substances authority	
Original credential	150.00
Renewal	150.00

(j) Drug wholesaler – Export:

Wholesaler credential	

Original credential	$825.00
Renewal	825.00
Late renewal penalty	300.00

(k) Drug wholesaler – OTC only:

Original credential	$465.00
Renewal	465.00
Late renewal penalty	235.00

(l) Drug wholesaler – Export nonprofit humanitarian organization:

Wholesaler credential

Original credential	$25.00
Renewal	25.00
Late renewal penalty	25.00

(m) Legend drug sample distributor:

Distributor credential

Original credential	$540.00
Renewal	540.00
Late renewal penalty	270.00

Controlled substances authority

Original credential	150.00
Renewal	150.00

(n) Poison manufacturer/seller:

Original credential	$55.00
Renewal	55.00
Late renewal penalty	50.00

(o) Precursor chemicals:

Original credential	$55.00
Renewal	55.00
Late renewal penalty	50.00

(p) Itinerant vendor:

Original credential	$55.00
Renewal	55.00
Late renewal penalty	50.00

(q) Sodium pentobarbital for animal euthanization:

Original credential	$55.00
Renewal	55.00
Late renewal penalty	50.00

(r) Shopkeeper:

Original credential	$55.00
Renewal	55.00

AMENDATORY SECTION (Amending WSR 16-18-069, filed 9/2/16, effective 9/8/16)

WAC 246-907-0302 Hospital pharmacy associated clinics ((~~licensing periods and fees——~~)) fees and renewal cycle. (1) Parent hospital pharmacy licenses with one or more hospital pharmacy associated clinics (HPAC) expire on June 1st of each year.

(2) A parent hospital pharmacy must submit fees for HPACs in addition to fees set in WAC 246-907-030(4). HPAC fees are due annually, except as provided under subsection (3)(d) of this section.

(3) A parent hospital pharmacy must submit the following nonrefundable fees based on category and number of HPACs as defined in WAC 246-873A-020(3) added to the parent hospital pharmacy license.

(a) **Category 1 HPAC.** A parent hospital pharmacy must submit the Category 1 HPAC fee according to the number of Category 1 HPACs under the parent hospital pharmacy license.

HPAC tier	Number of Category 1 HPACs under parent hospital pharmacy license	Total annual fee
A	1-10	$((~~640.00~~)) 895.00
B	11-50	$((~~1,600.00~~)) 2,240.00
C	51-100	$((~~2,240.00~~)) 3,125.00
D	Over 100	$((~~2,880.00~~)) 4,025.00

(b) **Category 2 HPAC.** A parent hospital pharmacy must submit the Category 2 HPAC fee for each Category 2 HPAC under the parent hospital pharmacy license.

Category 2 HPAC fee	$((~~540.00~~)) 755.00

(c) The department charges a processing fee of fifty-five dollars for an amended license to change the number of HPACs.

(d) If at any time a parent hospital pharmacy submits an addendum increasing the number of HPACs on the parent hospital pharmacy license, which changes the applicable HPAC tier to a higher fee amount, the parent hospital pharmacy shall submit the difference in fees with the addendum.

(e) The department will not refund fees when a tier reduction occurs between renewal periods.

REPEALER

The following section of the Washington Administrative Code is repealed:

WAC 246-907-0301 Pharmacy assistant licensing periods and fees——Fees and renewal cycle.

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TO: EXECUTIVE OFFICERS – STATE BOARDS OF PHARMACY

FROM: Maureen Garrity, Competency Assessment Director

DATE: December 6, 2018

RE: Restriction on Purchasing the NAPLEX or MPJE When the Eligibility Period Is 10 Business Days or Fewer; NAPLEX and MPJE Resit Fee Changes

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Effective February 4, 2019, the National Association of Boards of Pharmacy (NABP) will amend the policy for candidates to purchase the North American Pharmacist Licensure Examination (NAPLEX) and the Multistate Pharmacy Jurisprudence Examination (MPJE) when the eligibility period entered by the state board(s) of pharmacy is within 10 business days of expiring. Candidates are normally granted a one-year eligibility period to schedule a time to sit for the NAPLEX and MPJE. Candidates are encouraged to purchase their examination(s) as soon as they are granted eligibility and to schedule an appointment to test as soon as they receive their Authorization to Test (ATT) letter to ensure that their requested appointment time can be accommodated.

When a candidate's eligibility period is set to expire within 10 business days, it is extremely difficult, if not impossible, for the candidate to purchase an exam and schedule an appointment to test for the NAPLEX or MPJE before the eligibility period expires. Candidates who wish to purchase the NAPLEX or MPJE when the board has entered an eligibility period of 10 business days or fewer will be required to submit a new application and the board will be required to enter new eligibility dates.

Also effective February 4, NABP is changing the resit fees for the NAPLEX and MPJE. Resit fees apply to candidates who miss their scheduled testing appointment without following the proper cancellation procedures; this includes candidates turned away at the testing center for having improper identification. Candidates who submit appropriate paperwork to show that they missed the examination due to an emergency may purchase a resit at a reduced fee. Emergency situations will be evaluated on a case-by-case basis to determine what, if any, fees would be changed. The new fees are as follows:

- NAPLEX – $475 ($170 if approved for reduced fee due to emergency)
- MPJE – $150 ($100 if approved for reduced fee due to emergency)

Details on how candidates can submit claims for a reduced resit fee, including forms, required documentation, and submission deadlines, will be posted on the NABP website and available in the *NAPLEX/MPJE Application Bulletin* prior to February 4, when the new fees and the new process go into effect.

If you have any questions regarding the changes to the 10-day eligibility limitation or the resit fees, please contact me via email at mgarrity@nabp.pharmacy or via phone at 847/391-4596.

cc: NABP Executive Committee