Background: In 2019 the Legislature passed HB 1412, this bill amends RCW 18.64.360 to state that upon initial licensure and at renewal a nonresident pharmacy must submit a copy of an inspection report that is conducted by a program with substantially equivalent standards to the commission and was issued within the last 2 years.

Determination of recognized states and third party inspection programs. Current RCW 18.64.270 requires that any medicinal products that are compounded shall at a minimum meet the standards of the official United States Pharmacopeia. Compliance with USP compounding standards was one of the primary focuses in determining the equivalency of states and recognized third party inspection programs. The Commission also used the National Association of Boards of Pharmacy (NABP) BluePrint Inspection criteria in making its determination.

- **List of Approved States** – these states inspect to substantially equivalent standards as Washington. This was determined by reviewing standards regarding compliance with USP, participating in NABP’s BluePrint, or by using NABP Verified Pharmacy Program (VPP).

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<td>Alabama</td>
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<td>Kansas</td>
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</tbody>
</table>
- New Jersey
- New Mexico
- North Carolina
- North Dakota
- Ohio
- Oklahoma
- Oregon
- Pennsylvania (inspections after June 22, 2019)
- Rhode Island
- South Dakota
- Tennessee
- Texas*
- Utah
- Vermont
- Virginia
- West Virginia
- Wyoming

* Nonresident applicants and licensees may submit an inspection report from these states if the home state is not on the approved states list.

- **States that have substantially equivalent standards to Washington but do not meet Washington frequency standards** – these states hold pharmacies to substantially equivalent standards however they either do not perform inspections or inspections are not done within the 2 year requirement that is in law. Nonresident pharmacy applicants can work with their regulatory body to move up their inspection or use an approved third party inspection program to satisfy the requirements of RCW 18.64.360.
  - Delaware
  - Hawaii (no inspections)
  - Maine
  - Nebraska
  - New York

- **States that do not have substantially equivalent standards** – these states do not have substantially equivalent standards as Washington states, this includes not holding pharmacies to the minimum standard of USP. Pharmacies in these states would need to have an inspection done by an approved third party inspection program.
  - Alaska (inspections done on complaint)
  - Florida
  - Illinois *(USP adopted in May 2019 but not 800, frequency of inspections unknown)*
  - Pennsylvania *(inspected prior to USP adopted June 22, 2019)*
  - South Carolina
  - Wisconsin

- **Approved Third Party Inspection Program**
  - NABP VPP

The Commission will consider and reapprove the above list on an annual basis.