



June 5, 2023

Joe Schnabel  
Executive Director  
Oregon Board of Pharmacy  
800 NE Oregon St., Ste 150  
Portland, OR 97232

Dear Board Members and Mr. Schnabel:

On behalf of the Alliance for Pharmacy Compounding (APC) and the National Community Pharmacists Association (NCPA), I write in response to the fiscal impact request posted by the Oregon Board of Pharmacy regarding 855-115-0145 – proposed amendments to rules concerning Pharmacists, Preceptors, Interns, Certified Oregon Pharmacy Technicians, and Pharmacy Technicians.

APC is the voice for pharmacy compounding, representing compounding pharmacists and technicians in both 503A and 503B settings, as well as educators, prescribers, researchers, and suppliers. NCPA represents America's community pharmacists, including 19,400 independent community pharmacies. Together, our members represent a \$78.5 billion healthcare marketplace, employ 240,000 individuals, and provide an expanding set of healthcare services to millions of patients every day. Our members are small business owners who are among America's most accessible healthcare providers.

In general, we have concerns regarding aspects of these new requirements that are cumbersome and very challenging to implement and maintain. We are providing comments and information on the fiscal impact of the new proposed counseling requirements for compounding pharmacies that are licensed in the state and providing medications to Oregon patients.

- Requiring all pharmacists who provide counseling to Oregon patients to be licensed in the state will be unnecessarily costly for out-of-state pharmacies that currently only have a PIC licensed in the state. Providing clinical counseling is not state-specific and therefore should not require pharmacists to be licensed in Oregon, and very few states currently require this. The cost of a pharmacist license in Oregon including testing and licensing fees is upwards of \$500 for initial licensure and nearly \$300 to renew biennially and many pharmacies employ numerous pharmacists that will be required to obtain licensure, compounding those costs.
- Tracking and implementing an offer to counsel within 24 hours of delivery of a prescription will be challenging given current pharmacy software and its incompatibility with delivery tracking services. This rule also does not account for pharmacies that are closed on weekends and/or holidays. Allowing a written offer for counseling and removing the 24-hour time requirement would be much more feasible.

Overall, we believe these rules as currently written will present significant patient access issues and create an unnecessary financial burden for compounding pharmacies currently providing medications to patients in Oregon. There are many out of state compounding pharmacies specialize in certain disease states for which Oregon patients would be unable to obtain medications if these proposed rules are not edited. We urge that you amend or drop the proposal.

If APC or NCPA may be helpful to you on this or any other matter related to pharmacy compounding, please contact us at [scott@a4pc.org](mailto:scott@a4pc.org).

Sincerely,

ALLIANCE FOR PHARMACY COMPOUNDING & NATIONAL COMMUNITY PHARMACISTS ASSOCIATION