

November 25, 2025

Illinois Board of Pharmacy
c/o Illinois Department of Financial and Professional Regulation
Division of Professional Regulation
320 West Washington Street
Springfield, IL 62786

Re: Nonresident PIC Licensure Requirement – Request for Enforcement Discretion

Members of the Board:

We are writing to share concerns regarding the new requirement for nonresident pharmacies to designate an Illinois-licensed Pharmacist-in-Charge by January 1, 2026.

Over the past several months, we have received a growing number of reports from pharmacists who submitted complete PIC license applications well in advance of the deadline, some as early as spring and summer of 2025, whose applications remain pending with no projected approval date. Many have attempted to obtain status updates from the Board but continue to receive only confirmation that the application is “in process.”

These prolonged processing times place nonresident pharmacies in an increasingly difficult position. They are actively trying to comply with the new requirement, have submitted the necessary materials in good faith, and are simply waiting on the state’s review. Without timely licensure action, however, these pharmacies risk falling out of compliance on January 1 through no fault of their own. This could disrupt services to Illinois patients and create unnecessary operational and compliance uncertainty.

For that reason, we respectfully request that the Board adopt a period of enforcement discretion for any nonresident pharmacy that:

1. Submitted its PIC license application prior to January 1, 2026, and
2. Is awaiting approval solely due to administrative processing delays.

Under this approach, the pharmacy would be deemed compliant while the Board is processing the application.

Such an approach would allow pharmacies to continue serving Illinois patients while the Department completes its review, and it would ensure that pharmacists who acted proactively are not penalized for delays beyond their control. We believe this is both reasonable and consistent with the Board’s mission to protect public welfare without interrupting patient access to needed pharmacy services.

We appreciate the Board's attention to this issue and would welcome the opportunity to discuss possible pathways to support a smooth transition into the new PIC licensure framework. Please reach out if additional information or feedback would be helpful.

Sincerely,

Alliance for Pharmacy Compounding
National Community Pharmacists Association

The Alliance for Pharmacy Compounding is the industry trade association and the voice for pharmacy compounding, representing more than 600 compounding small businesses — including 7,500 compounding pharmacists and technicians in both 503A and 503B settings — as well as prescribers, educators, researchers, and suppliers.

NCPA represents America's community pharmacists, including 18,900 independent community pharmacies. Almost half of all community pharmacies provide long-term care services and play a critical role in ensuring patients have immediate access to medications in both community and long-term care (LTC) settings. Together, our members employ 205,000 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.