

Annual Report
Fiscal Year 2015

BOARD OF PHARMACY

July 2015



**DIVISION OF CORPORATIONS, BUSINESS
AND PROFESSIONAL LICENSING**

This Annual Performance Report is presented in accordance with Alaska Statute 08.01.070(1) and Alaska Statute 37.07.080(b). Its purpose is to report the accomplishments, activities, and the past and present needs of the licensing program.

**BOARD OF PHARMACY
FY 2015 ANNUAL REPORT**

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BOARD OF PHARMACY
FY 2015 ANNUAL REPORT
IDENTIFICATION OF BOARD

<u>Board Member</u>	<u>Date Appointed</u>	<u>Term Expires</u>
Dirk White, RPh.	March 1, 2007	March 1, 2015
John Cotter, RPh.	September 9, 2011	March 1, 2017
Lori DeVito RPh.	March 2, 2011	March 1, 2016
Christopher J. Kim RPh.	March 1, 2009	March 1, 2016
William Altland, RPh.	March 1, 2014	March 1, 2018
Leif Holm, Pharm D.	March 1, 2015	March 1, 2019
Anne Gruening Public Member	March 1, 2010	March 1, 2018
Taryl Giessel Public Member	March 22, 2013	March 1, 2017

BOARD OF PHARMACY
FY 2015 ANNUAL REPORT
IDENTIFICATION OF STAFF

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BOARD OF PHARMACY
FY 2015 ANNUAL REPORT
NARRATIVE STATEMENT

Include an overview of the board's activity, industry trends in licensure, public protection challenges, and other information useful to Alaska stakeholders in understanding your work during FY15.

The Board held four meetings during FY 2015 as follows:

- August 7-8, 2014, Anchorage
- November 20-21, 2014, Anchorage
- February 25-27, 2015, Juneau
- May 21-22, 2015, Anchorage

Board Members during 2015:

- Anne Gruening, Public Member, Secretary, Juneau (term expires 3/18)
- Taryl Giessel, Public Member, Eagle River (term expires 3/17)
- Dick White, RPh., Chair, Sitka (term expired March 2015)
- John Cotter, RPh., Chair, Fairbanks (term expires 3/17)
- Lori DeVito, RPh., Vice-Chair, Soldotna (term expires 3/16)
- William Altland, Rph., Craig (term expires 3/18)
- Leif Holm, Pharm D, North Pole (term expires 3/19)

Sher Zinn is the Records & Licensing Supervisor. Brian Howes serves as the Board Investigator, based in Anchorage.

Regulation Projects: The Board is continuing to work on regulation projects related to the Prescription Drug Monitoring Program. These include an exemption from report, pre-pack prescriptions dispensed to patients for short-term coverage not to exceed 72 hours, and a Regulation allowing healthcare professionals to delegate access to the PDMP, to their staff.

The Board began regulations for the definition of sterile compounding standards, pharmacy technician certification, emergency preparedness, and with the passage of SB71 that will become law on August 9th, 2015 the board will develop standards for pharmacists to administer vaccines and related emergency medications without a collaborative plan with a physician. Mandatory reporting by in-state pharmacy to the Board, when they obtain out-of-state licenses and a declared scope of practice. A regulation requiring Board recognition of the federal license exemptions for licensees practicing in a Tribal Health program unless they have notified the Board that they are practicing under another license in accordance with section 221 of 25 U.S.C. & 162lt (Patient Protection and Affordable Care Act, 2010).

Controlled Substance Prescription Database (aka Prescription Drug Monitoring Program or PDMP) (**12 AAC.52.855 – 12 AAC 52.895**) – The PDMP was mandated by the Alaska Legislature in 2008. The primary purpose of the PDMP is to create a database that records all dispensed controlled substances. This will allow prescribers and pharmacists to identify, through secure methods, patients who are “doctor shopping” and/or prescribers who are over-prescribing. The program has proved very valuable to many prescribers and pharmacists within Alaska. Doctors working out of hospital emergency rooms have been particularly vocal on its merits. This is a public health and safety issue, and funding for the program is still in jeopardy. The State has applied for two federal grants to fund the program since legislation did not get introduced for state funding.

Automatic Dispensing Systems: The Board continues to review and investigate the place for Automatic Dispensing Systems and how they should be regulated in Alaska. Currently there are a number of these systems in Alaska, mostly in physician offices and out of the purview of the Board of Pharmacy. Their safety and benefits of use have not yet been determined.

RECOMMENDATIONS FOR PROPOSED LEGISLATION:

Out-of-State Wholesale Distributors – Alaska is now the only state that does not license out-of-state wholesale drug distributors. This shortcoming is an important concern, especially since the passage of the DQSA (Drug Quality Security Act) in November of 2013. This law now requires “Track and Trace” from the state in which the wholesale distributor is located and/or ships from and into the state in which the drugs are shipped into.

Oversight of distributors shipping drugs into Alaska is a primary concern due to the increase of prescription drug counterfeiting and the utilization of Automatic Dispensing Systems, which are currently unregulated and are often serviced from outside of the state. Currently the Board does not have the authority to regulate Wholesale Drug Distributors or Third Party Logistic Providers, and would like to introduce a bill to the legislature to add a new section **AS 08.80.159 Registration of Wholesale Distributors**. This legislation would not have any negative cost issues and would help to assure the safe delivery of controlled, non-counterfeit medications to Alaska residents, and prevent other parties from circumventing Alaska laws to obtain products they currently are not licensed to handle, prescribe, or distribute. Due the priority of the state budget, a bill was not introduced this past legislative session. The Board will re-introduce draft legislation for the 2016 legislative session.

DQSA now allows an entity that compounds sterile drugs to register as a 503b outsourcing facility. Section 503b specifies that an outsourcing facility may only compound with a bulk drug substance which appears on an FDA-established list of bulk drug substances for which there is a clinical need or which are on the FDA’s drug shortage list. The Board is consulting with NABP and is tracking how other states are handling licensing this entity.

Pharmacy Audit Bill: Pharmacy Audit Bills before the State House and Senate did not pass. The Alaska Pharmacist Association will introduce again for the 2016 legislative session. The Board strongly supports the Association’s efforts regarding this legislation, and would encourage the Legislature for its passage in next session. A majority of other states already have enacted this.

RECOMMENDATIONS FOR REGULATION PROJECTS, FY 2015:

- Sterile Compounding Standards
- Pharmacy Technician Certification (In-process)
- Emergency Preparedness (In-process)
- Standards for Pharmacist Immunizations
- Inspections of In-state/Out-of-State Pharmacies for use with NABP’s VPP (Verified Pharmacy Program)
- Federal licensure exemptions for persons who practice in an Alaska tribal health programs

NATIONAL ASSOCIATION OF BOARDS OF PHARMACY:

The Board of Pharmacy continues to participate in the process of keeping current the pools of questions for the law exam given to pharmacists prior to licensing in Alaska. This is a formal exam called the Multi-State Pharmacy Jurisprudence Examination (MPJE), operated by NABP, which requires an Alaska pool of questions to be reviewed annually and new questions added. Each year two Board members are required to travel to NABP headquarters in Illinois, to review test questions, and then approve or delete questions and add others. If Board members are unable to attend due to scheduling conflicts they may participate remotely. The Board will determine which two members will attend during FY 2016.

LICENSING ACTIONS:

The Board conducted reviews of licensing issues as presented by the Board investigator and paralegal and actions were passed as warranted.

BUDGET RECOMMENDATIONS FY 2015:

1. Maintain the frequency of full board meeting at four per year.
2. Travel and per diem for two board members to attend MPJE (Multi-State Jurisprudence Exam) Review Meeting and for 2 members to attend the MPJE Question Writing Meeting.
3. Travel and per diem for one board member to travel and attend Annual NABP meeting
4. Travel and per diem for one board member to travel and attend Region 7 District NABP Meeting.
5. Travel and per diem for Licensing Examiner to travel to attend Interactive Executive Officer Conference.

**BOARD OF PHARMACY
FY 2015 ANNUAL REPORT
BUDGET RECOMMENDATIONS FOR FY 2016**

TRAVEL REQUESTS: Rank in order of the board’s priority. Provide the best estimates based on past actuals and seasonal trends in travel, such as summer hotel rooms or increased fuel costs. Calculate on full costs and note any third-party fiscal offsets. Expand the tables below as needed.

Board Meetings

Date	Location	# of Board Members	# of Staff	Total Estimated Cost (total of airline, hotel, mileage, M&IE, parking, rental car, taxi, etc.)
8/13-14, 2015	Anchorage, AK	7	1	\$5,500.00 (Summer season)
11/12-13, 2015	Anchorage	7	1	\$5,000.000
Jan 2016	TBD	7	1	\$6,000 (May be held in Juneau)
May 2016	TBD	7	1	\$5,500.00 (Summer season)

Travel Required to Perform Examinations

Date	Location	# of Board Members	# of Staff	Total Estimated Cost (total of airline, hotel, mileage, M&IE, parking, rental car, taxi, etc.)
	N/A			
Description of meeting and its role in supporting the mission of the board:				
Description of meeting and its role in supporting the mission of the board:				

Out-Of-State Meetings and Additional In-State Travel

Rank in order of the board’s priority. “Reimbursement” refers to payment to the division to cover travel costs. “Direct” refers to an offer by a company to secure travel arrangements on behalf of the board member.

Rank	Date	Location	# of Board Members	# of Staff	Total Estimated Cost		Total Potential Third-Party Offset
					(total of airline, hotel, mileage, M&IE, parking, rental car, taxi, etc.)	Conference Fee	<input checked="" type="checkbox"/> Reimbursement <input type="checkbox"/> Direct
1	September 14-17, 2015	NABP/AACP MEETING DISTRICTS 6/7/8 Incline Village, NV	1	0	\$3,500.00	\$375.00 (not reimbursed)	Eligible for \$1500 reimbursement
	Description of meeting and its role in supporting the mission of the board: Attendance at this meeting allows the Board to participate and remain proactive in district issues in pharmacy and networking with other states within the district. District 7 includes: Alaska, Alberta, British Columbia, Idaho, Montana, Oregon, Washington, and Wyoming.						
2	May 14-17, 2016	NABP 112 TH Annual Meeting Hilton San Diego Bayfront Hotel San Diego, CA	1	0	Conference fee not reimbursed \$3,500.00. Eligible for \$1500 reimbursement		<input checked="" type="checkbox"/> Reimbursement <input type="checkbox"/> Direct
	Description of meeting and its role in supporting the mission of the board: Attendance at this meeting allows the Board to participate and remain proactive on national and federal issues in pharmacy						
3	TBD	MPJE Question Writing Meeting NABP Headquarters – Mt. Prospect, IL	2	0	\$4,200.00. Eligible for \$1500 reimbursement per member		<input checked="" type="checkbox"/> Reimbursement <input type="checkbox"/> Direct
	Description of meeting and its role in supporting the mission of the board: Board Participation required						
4	October 13-14, 2015	NABP Interactive Executive Officer forum	0	1	\$2,500.00. Eligible for \$1500 reimbursement		<input checked="" type="checkbox"/> Reimbursement <input type="checkbox"/> Direct
	Description of meeting and its role in supporting the mission of the board: Attendance would allow Examiner to network with peers from other states and participate in group sessions on NABP systems and discussions relating to issues at the state and national level.						

**BOARD OF PHARMACY
FY 2015 ANNUAL REPORT
BUDGET RECOMMENDATIONS FOR FY 2016 CONTINUED**

NON-TRAVEL BUDGET REQUESTS

Dues/Memberships/Resources/Online Training/Teleconferences/Examination Contracts

Provide details of the budgetary request. Break down into specific events, where applicable.

Product or service: Alaska BOP Newsletter	Provider: NABP	Cost per event: \$465.00
Description of item and its role in supporting the mission of the board: AK State newsletter is the primary way of communicating with licensees and colleagues, regarding regulation changes, current Board activity, and other related matters that are important and need to be communicated to AK licensees and NABP members.		
Product or service: NABP Annual Membership	Provider: NABP	Cost per event: \$250.00
Description of item and its role in supporting the mission of the board: NABP provides national information about what is happening at the Federal level, and also provides information regarding regulations and protocols in other States. NABP also maintains the electronic database for Continuing Education units and for the Verified Pharmacy Program regarding inspection reports for out-of-state pharmacies. The NABP website is also utilized to make all of the qualified pharmacist applicants eligible to test for the MPJE(state jurisprudence exam) and NAPLEX (national exam)		
Product or service:	Provider:	Cost per event:
Description of item and its role in supporting the mission of the board:		

Other Items with a Fiscal Impact:

Product or service:	Provider:	Cost per event:
Description of item and its role in supporting the mission of the board:		
Product or service:	Provider:	Cost per event:
Description of item and its role in supporting the mission of the board:		

Summary of FY16 Fiscal Requests

Board Meetings	\$22,000.00
Travel for Exams	N/A
Out-Of-State and Additional In-State Travel	\$13,700.00
Dues/Memberships/Resources/Online Training/Teleconferences	\$715.00
Total Potential Third-Party Offset	(\$7,500.00)
Other	
Total Requested:	\$28,915.00

Additional information:

BOARD OF PHARMACY
FY 2015 ANNUAL REPORT
ANTICIPATED PROPOSED LEGISLATION FOR FY 2016

Complete one sheet per legislative proposal

Focus Area (Check all that apply)

- Economic Development
- Government Within Our Means
- National Regulatory/Industry Changes
- Enhance Public Protection

1. Subject and Proposed Language (include intent and statutory reference)

Reintroduce legislation that would license out-of-state wholesale drug distributors and Third Party Logistic Providers. This may also include 503b entities that register with the FDA.

2. Explain the benefits the proposed legislation would provide.

- Create statutory authority for the Board of Pharmacy to regulate and monitor legend drugs being provided to facilities and residents of Alaska from out-of-state wholesale drug distributors and compounded drugs shipped in bulk from 503b outsourcing facilities.
- Provide the Board of Pharmacy means by which the State of Alaska has recourse to combat increased frequency of counterfeit medications being produced and distributed by out-of-state vendors and support efforts to maintain the integrity of the Drug Supply Chain.
- Resolve the issue of acquisitions of prescription medications from out-of-state wholesalers by those without adequate prescriptive authority.
- Become compliant with DSCSA (Drug Supply Chain Security Act) implementation of product tracing requirements as required under section 582 of the FD&C Act (Food, Drug, and Cosmetic Act) included in the passage of DQSA (Drug Quality Security Act) in November 2013.
- Create a revenue source from application and licensing fees to cover the costs of these new BOP licensing categories.
- Create authority for the Board of Pharmacy to regulate the inventory management of Automatic Dispensing Systems in high risk environments.

3. Explain the consequences, if any, of not implementing the proposed statutory change.

- Non-compliance with FDA and DSCSA (Drug Supply Chain Security Act) product tracing requirements as required under section 582 of the FD&C Act (Food, Drug, and Cosmetic Act). Alaska is the only remaining state that does not license out-of-state wholesale distributors.
- Increased acquisition and distribution of prescription medications by those who are not qualified to do so.
- Increased liability to the Board and the State of Alaska for federal non-compliance and inadequate safeguards.

4. Describe any potential negative impacts of this legislation and how they would be minimized.

None

5. Who do you anticipate will support the bill and why? Include municipalities, groups, etc...

- Alaska Pharmacist Association: Assures the quality and safety of medications coming into Alaska and reduces liability in the pharmacy profession; provides integrity of drug supply chain which provides better quality of patient care.
- NABP (National Association of Boards of Pharmacy) is advising and working with all 50 states on becoming compliant since the passage DQSA (Drug Quality Security Act).
- Law enforcement: Supports efforts to maintain secure Drug Supply Chain
- Medical Professions: Supports efforts to maintain secure Drug Supply Chain and as a result improve patient outcomes; improves compliance with scope of practice among license holders.
- National Pharmacy and Medical Supplier Organizations: Creates consistency in regulation among all states; improves operational procedures and efficiencies.
- FDA: Would bring Alaska into compliance with DQSA.

6. Who do anticipate will oppose the bill and why?

The Board is not aware of opposition

7. What other state departments will be affected by this legislation? Have you discussed the impact with the affected departments, and if so who and do they support this bill?

The Board is not aware that this legislation would impact other department within the state.

8. Identify and describe any previous state or federal legislation or similar efforts in other states which affect or relate to this proposal.

- Alaska is the remaining state that does not license Out-of-State Wholesale Drug Distributors.
- The Alaska Board of Pharmacy has been regulating In-State Wholesale Drug Distributors and Out-of-State Pharmacies nearly since the creation of the Board. Due to the increase in counterfeit drugs which has impacted the Drug Supply Chain and the explosion of internet pharmacies

9. Has this bill topic been previously introduced in the legislature? If so, what was the final outcome and why?

Yes, there was bill that was introduced in the 2014 legislative session that did not pass. Other items were tacked onto the bill and bogged the bill down. This past legislative session due to the priority being the state budge the bill did not get introduced. The Board of Pharmacy will work to rewrite the bill and reintroduce it for the upcoming 2016 legislative session.

10. In the event questions should be raised during review of this request, please indicate below which board member should be contacted:

John Cotter, RPh, Board of Pharmacy Chair – Fairbanks, AK.

BOARD OF PHARMACY
FY 2015 ANNUAL REPORT
ANTICIPATED PROPOSED LEGISLATION FOR FY 2016

Complete one sheet per legislative proposal

Focus Area (Check all that apply)

- Economic Development
- Government Within Our Means
- National Regulatory/Industry Changes
- Enhance Public Protection

1. Subject and Proposed Language (include intent and statutory reference)
To be included in the Out-of-State Wholesale Drug Distributor Bill:

Sec. 08.80.TBD Executive Administrator of board. (a) The Department, in consultation with the board, shall employ a person who is not a member of the board to serve as the executive administrator of the board. (b) The executive administrator of the board shall perform duties prescribed by the board. (c) The executive administrator of the board is in the partially exempt service and entitled to receive a monthly salary equal to a step in Range 18 on the salary schedule set out in AS 39.27.011(a).

2. Explain the benefits the proposed legislation would provide.

The addition of and Executive Administrator is distinguished from the Licensing Examiner and would provide a higher level of service to the Board of Pharmacy through the following:

- Administering and coordinating the functions of the Board and implementing the statutes, regulations and policies governing licensing and regulations of those in the Pharmacy profession for the protection of the public.
- Serve as Board spokesman and liaison to the media, legislative and executive branch agencies, professional associations, The Division of Corporations, Business and Professional licensing, as well as to individual applicants, licensees and consumers.
- Represent the Board and the division at state and national meetings of regulatory agencies and professional associations.
- Inform the Board and division about national, federal and local issues affecting regulation of the professions.
- Research issues for the Board and/or the division and provide findings in written and oral form.

3. Explain the consequences, if any, of not implementing the proposed statutory change.

- Managing the current workload, regulation projects and the passage of the DQSA (Drug Quality Security Act) in November 2013 has become more than the current structure of one licensing examiner to manage effectively.

4. Describe any potential negative impacts of this legislation and how they would be minimized.

None

5. Who do you anticipate will support the bill and why? Include municipalities, groups, etc...

- The Division of Corporations, Business and Professional Licensing – To more effectively manage the increase in licensing applicants and changes that are occurring through increase in federal oversight of certain licensing categories and better compliance with national standards.
- NABP (National Association Boards of Pharmacy) – Additional resource to the board for legislative and regulation requirements for additional licensing categories required due to the passage of DQSA.

6. Who do anticipate will oppose the bill and why?

The Board is not aware of opposition

7. What other state departments will be affected by this legislation? Have you discussed the impact with the affected departments, and if so who and do they support this bill?

The Board is not aware that this legislation would impact other department within the state.

8. Identify and describe any previous state or federal legislation or similar efforts in other states which affect or relate to this proposal.

None that the Board is aware of

9. Has this bill topic been previously introduced in the legislature? If so, what was the final outcome and why?

None

10. In the event questions should be raised during review of this request, please indicate below which board member should be contacted:

John Cotter, RPh, Board of Pharmacy Chair – Fairbanks, AK.

BOARD OF PHARMACY
FY 2015 ANNUAL REPORT
ANTICIPATED REGULATIONS FOR FY 2016

Briefly explain any regulations projects that the board expects to propose this fiscal year.

- Sterile Compounding Standards – The Board will write detailed sterile compounding standards to be in better compliance with DQSA and for utilization in the Multi-State inspection reports being developed through NABP.
- Pharmacy Technician Certification - (Regulation project in process) To develop competency standards for Pharmacy Technicians by creating two licensing categories, a Pharmacy Technician License Clerk license and a Certified Technician license.
- Emergency Preparedness – (Regulation project in process) To develop rules and regulations by the Board of Pharmacy where none currently exists if a State of Emergency is declared by the Governor of the State of Alaska.
- Standards of Pharmacist Immunizations – SB71 becomes law on August 9th, 2015. The Board will develop regulations and standards for pharmacists to administer vaccines and related emergency medications with a collaborative plan with a physician.
- Inspections of In-state/Out-of-State for use with NABP's VPP (Verified Pharmacy Program) – The Board will develop regulations that will allow for Alaska's inclusion in the development of a national standard for pharmacy inspections and will help build uniformity, in how inspections are conducted state to state.
- Federal licensure exemptions for persons who practice in an Alaska tribal health program – The Board will submit a regulation from the medical board's lead if their Regulation **12 AAC. 40.981 Federal licensure Exemptions for persons who practice in an Alaska tribal health program** is approved.

BOARD OF PHARMACY
FY 2015 ANNUAL REPORT
GOALS AND OBJECTIVES FOR FY 2016

Explain the Board's mission:

To promote, preserve, and protect the public health, safety, and welfare by and through the effective control and regulation of the practice of pharmacy.

List the Board's FY15 goals and objectives and how they were met:

The Board of Pharmacy goals and objectives remain fluid and the Board tries to meet its goals and objectives in a proactive manner. It is always the Board's goal of getting legislation introduced, and it is our continued hope that the legislative and regulation work done in 2015 will be introduced and move forward in 2016.

- 1) The Board will continue to promote, preserve, and protect the public health, safety and welfare by and through the effective control and regulation of the practice of pharmacy
- 2) The Board will continue to provide input and comment on any proposed legislation/regulations involving medications or pharmaceutical care.
- 3) The Board will continue to promote effective patient counseling by licensees.
- 4) The Board will continue to assess and evaluate the Multi-State Pharmacy Jurisprudence Examination (MPJE).
- 5) The Board will continue to assess and evaluate the Jurisprudence practice exam and its effectiveness as a learning tool for interns.
- 6) The Board will continue to assess and evaluate the licensing of Pharmacy Technicians.
- 7) The Board will continue its affiliation with NABP and send one member to the District 7 NABP meeting, and one member to the Annual NABP meeting.
- 8) The Board will continue to evaluate the impact of current regulations and the need for new regulations.
- 9) The Board will work to provide standards and regulations for independent administration by a pharmacist of vaccines and related emergency medications per passage of SB71 that becomes law August 9, 2015.
- 10) The Board will assess and evaluate the growing public concern regarding the abuse of illicit and prescription drugs, internet pharmacies, counterfeit drugs and continued support for funding the Prescription Drug Monitoring Program.
- 11) The Board will monitor, assess, evaluate and modify The Alaska Prescription Drug Monitoring Programs based on the best interest of the public and the profession.

List the Board's FY16 goals and objectives. Include any strengths, weaknesses, opportunities, and threats, as well as any resources needed:

- 1) The Board will continue to promote, preserve, and protect the public health, safety, and welfare by and through the effective control and regulation of the practice of pharmacy.
- 2) The Board will work to introduce legislation for authority to license out-of-state wholesale drug distributors and third party logistic providers. With the increase in licensing categories, applicants, and federal oversight the Board has identified the need for additional resources and will seek statutory authority to employ an executive administrator for the Board of Pharmacy.
- 3) The Board will continue to provide input and comment on any proposed legislation/regulations involving medications or pharmaceutical care.
- 4) The Board will continue to promote effective patient counseling by licensees.
- 5) The Boards will continue to assess and evaluate the Multi-State Pharmacy Jurisprudence Examination (MPJE).
- 6) The Board will continue to assess and evaluate the jurisprudence practice exam and its effectiveness as a learning tool for interns.
- 7) The Board will continue to assess and evaluate the licensing of Pharmacy Technicians.
- 8) The Board will continue its affiliation with NABP and send one member to the District 7 NABP meeting, and two members to the annual NABP meeting.
- 9) The Board will continue to evaluate the impact of current regulations and the need for new regulations.
- 10) The Board will assess and evaluate the growing public concern regarding the abuse of illicit and prescription drugs, internet pharmacies, counterfeit drugs and support continued funding and enhancement for the PDMP (Prescription Drug Monitoring Program).
- 11) The Board will monitor, assess, evaluate and modify the Alaska Prescription Drug Monitoring Programs based on the best interest of the public and profession.

In order to join the state in a time of austerity, list the top three areas where the board believes this licensing program could reasonably reduce its costs or services.

**BOARD OF PHARMACY
FY 2015 ANNUAL REPORT
SUNSET AUDIT RECOMMENDATIONS**

Date of last Legislative Audit: November 9, 2012

Board sunset date: June 30, 2018

Audit Recommendation #1:

The Board should improve Collaborative Practice Agreements in accordance with regulations.

Action taken: The process for review and approval was modified to include a checklist for each agreement submitted. The check list is based on the Collaborative Practice regulations
Next Steps: The Board reviewed the checklist and concurred that its implementation has helped insure ongoing compliance
Date completed:

Audit Recommendation #2:

DCCED's Professional Licensing Administrative Officer should improve administrative support

Action taken This recommendation was addressed internally.
Next Steps:
Date completed:

Audit Recommendation #3:

Board of Pharmacy and staff, with the office of the Governor, should work together to increase the pool of qualified applicants available for Board appointments to ensure full representation.

Action taken: Since the recommendation has been made, the Board of Pharmacy has been a full Board until the resignation of a public member in April 2012. The vacancy has been filled and the Board has seven members consisting of five pharmacists and two public members.
Next Steps:
Date completed:

Audit Recommendation #4:

Action taken:
Next Steps:
Date completed: