

MISSOURI BOARD OF PHARMACY



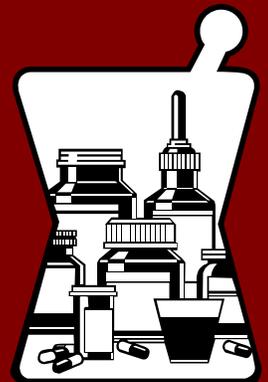
ANNUAL REPORT

FY 2012

JEREMIAH W. "JAY" NIXON, GOVERNOR
STATE OF MISSOURI

JOHN HUFF, DIRECTOR
DEPT. OF INSURANCE, FINANCIAL INSTITUTIONS AND
PROFESSIONAL REGISTRATION

JANE RACKERS, DIRECTOR
DIVISION OF PROFESSIONAL REGISTRATION





Jeremiah W. (Jay) Nixon
Governor
State of Missouri

Jane A. Rackers, Division Director
DIVISION OF PROFESSIONAL REGISTRATION

Department of Insurance
Financial Institutions
and Professional Registration
John M. Huff, Director

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Kimberly A. Grinston
Executive Director
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To The Honorable Jeremiah W. "Jay" Nixon:

In compliance with § 338.140.3, RSMO, the Missouri Board of Pharmacy is pleased to submit to you its Annual Report. The Board of Pharmacy is pleased to report another successful year. This report contains the proceedings of the Board for the fiscal year ending June 30, 2012 ("FY 12").

Respectfully yours,

MISSOURI BOARD OF PHARMACY

By:

A handwritten signature in black ink, appearing to read "K A Grinston".

Kimberly Grinston
Executive Director

DEPARTMENT OF INSURANCE, FINANCIAL INSTITUTIONS
AND PROFESSIONAL REGISTRATION

DIVISION OF PROFESSIONAL REGISTRATION

Missouri Board of Pharmacy

FY12

Board Members and Staff

BOARD MEMBERS:

PAMELA L. MARSHALL, R.PH., PRESIDENT

JANINE M. BURKETT, R.PH., VICE-PRESIDENT

BARBARA A. BILEK, PHARM.D., MEMBER

MELISSA A. GRAHAM, R.PH., MEMBER (*RESIGNED 1/1/12*)

ANITA K. PARRAN, PUBLIC MEMBER

JAMES D. RIDDLE, R.PH., MEMBER

VACANT POSITION

Missouri Board of Pharmacy

P.O. Box 625

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Kimberly A. Grinston, J.D., Executive Director

Office Staff

Tammy Siebert, Executive Assistant

Regina Divine, Pharmacist/Intern Coordinator

Jason Menken, Compliance Coordinator

Laura Henke, Pharmacy/Drug Dist. Coord.

Kelly Bowers, Technician Coordinator

Inspectors

Tom Glenski, R.Ph., Chief Inspector

George McConnell, R.Ph.

Andrea "Andi" Miller, PharmD.

Steven Smith, R.Ph.

Daniel Vandersand, R.Ph.

Frank VanFleet, R.Ph.

Sidney "Sid" Werges, R.Ph.

Barbara A. Wood, R.Ph.

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MISSION STATEMENT

The Board's mission is to serve and protect the public by providing an accessible, responsible and accountable regulatory system that:

- *Protects the public from incompetence, misconduct, gross negligence, fraud, misrepresentation or dishonesty;*
- *Licenses only qualified and competent professionals, and;*
- *Ensures compliance with professional standards and federal and state pharmacy law.*

ABOUT THE MISSOURI BOARD OF PHARMACY

The Board of Pharmacy is an autonomous Board within the Division of Professional Registration, an agency of the Department of Insurance, Financial Institutions and Professional Registration. The Missouri Board of Pharmacy was statutorily created in 1909 by House Bill 87 and has served the citizens of Missouri through the regulation of pharmacy practice for over 100 years.

MEMBERSHIP

The Board consists of seven (7) members, including, six (6) licensed pharmacists actively engaged in the practice of pharmacy and one (1) public member. By statute, at least one Board member must be a person who provides pharmaceutical services to a hospital, skilled nursing facility or intermediate care facility on a full-time basis.

Board members are appointed by the Governor and must be approved by the Missouri Senate. All members hold office for five (5) years from the date of their appointment and until their successors have been appointed and qualified. The Board annually elects a president and vice-president, each of whom serve one (1) year terms.

FUNCTIONS

Pursuant to Chapter 338, RSMo, the Board has superintending control over the practice of pharmacy in the State of Missouri and its primary duties consist of:

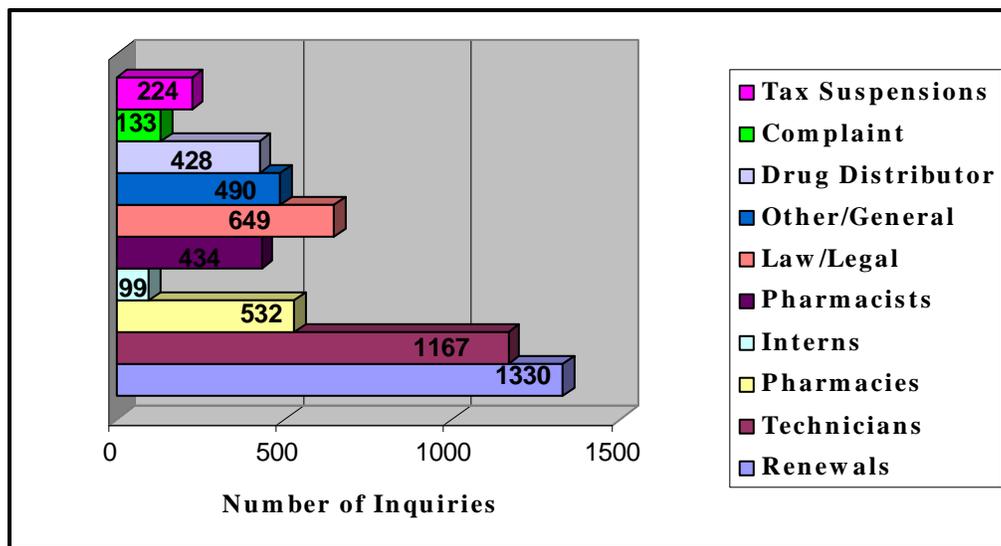
- Examining and licensing pharmacist applicants;
- Ensuring compliance with Chapter 338, RSMo, and the rules of the Board;
- Licensing/registering pharmacy technicians, intern pharmacists, pharmacies and drug distributors;
- Biennially renewing the licenses of qualified pharmacists, pharmacy interns, pharmacies, and drug distributors;
- Registering and renewing pharmacy technicians;
- Investigating complaints involving unlicensed activity or against any licensee or registrant;
- Disciplining licensees which may include, public censure, probation, suspension or revocation of a licensee/registrant;
- Maintaining the Technician Employment Disqualification List for pharmacy technicians found to be in violation of Chapter 338, RSMo;
- Inspection of pharmacies and drug distributors; and
- Approval of preceptors and intern training pharmacies.

A. MEETINGS

During FY12, the Board held five (5) regular session meetings, seven (7) conference call meetings and four (4) email ballot meetings. To encourage public participation and pharmacy student outreach, meetings were held in Columbia, Kansas City and St. Louis, Missouri.

B. TELEPHONE INQUIRIES

Board of Pharmacy office staff received and responded to 5,486 incoming telephone calls in FY12 on a variety of subjects. Major topics are indicated below:



C. EDUCATION/TRAINING

The following educational/training programs were hosted by the Board in FY12 (*participants were awarded free continuing education credit*):

- 2012 Review of Missouri's Immunization/Administration Regulations
- Pharmacy Security & Drug Diversion Awareness
- Compliance Keys for Drug Distributors
- Compliance Keys for the Pharmacist-in-Charge & Pharmacy Managers/Supervisors
- Missouri Bureau of Narcotics & Dangerous Drugs Regulatory Update
- Drug Distributor Compliance Keys

D. GOLD CERTIFICATES

The following individuals received Gold Certificates during 2012 representing fifty (50) years of active service as a Missouri licensed pharmacist:

Alexander, Robert S.
Bangert, Philip A.
Bell, Ola L.
Buck, Harry E., Jr.
Cushman, Bobby J.
Dempster, David R.
Dolan, Timothy C.
Galluzzo, William J.
Gardner, Richard L.
Graham, Dale E.
Hammontree, Charles H.
Hitschler, Michael B.
Hudson, Ellen J.
Ingram, Edwin B., Jr.
Johnston, David E.
Mackay, George R.

Mewhirt, Billy G.
Muchnik, Barry A.
Palma, Salvatore F.
Roehrs, Robert E.
Rowland, Loy F.
Ruedin, Gary A.
Schmidt, James R., Jr.
Shea, Joseph A.
Shultz, John M. Jr.
Stamm, Edwin L. II
Stamper, George L.
Stoltz, Wanye W., Jr.
Wilson, Barry A.
Wolfangel, Robert G.
Wolff, Donald R.



A. GENERAL OVERVIEW

The Missouri Board of Pharmacy's appropriation for fiscal year ending June 30, 2012, was as follows:

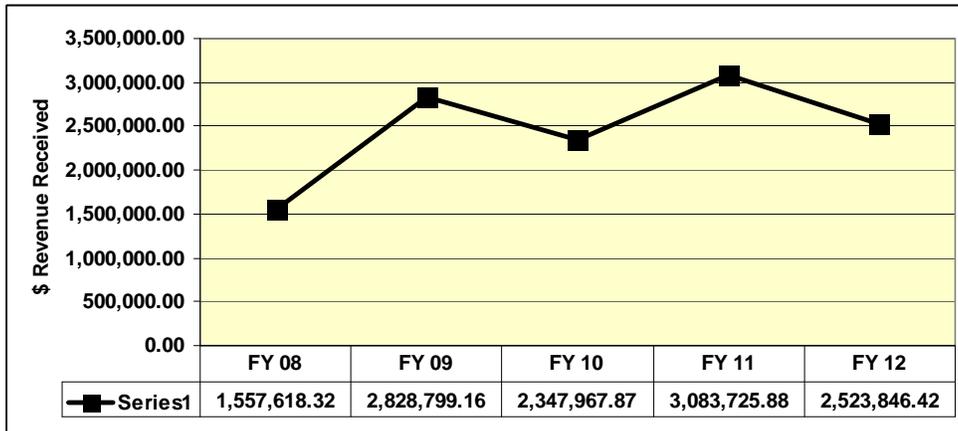
Personal Service	\$ 940,068
Expense and Equipment	\$ 672,948
Criminal History Fund	\$ 5,000 E
Transfers*	\$ 977,495.45

Of the amount appropriated, the Board expended \$ 1,790,084.18 in FY 12 as follows:

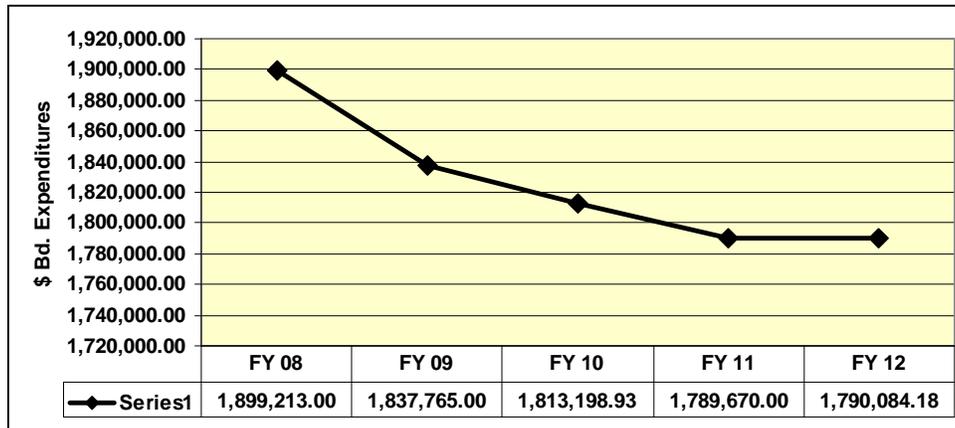
Personal Service	\$ 872,561.94
Expense and Equipment	\$ 311,871.34
Transfers*	\$ 605,650.90

**Transfers include costs/transfers for rent, the Division of Professional Registration, IT transfers, licensee refunds, attorney general services, Administrative Hearing Commission, DIFP Allocated Expenses, OA Allocated Expenses.*

REVENUE RECEIVED



BOARD EXPENDITURES



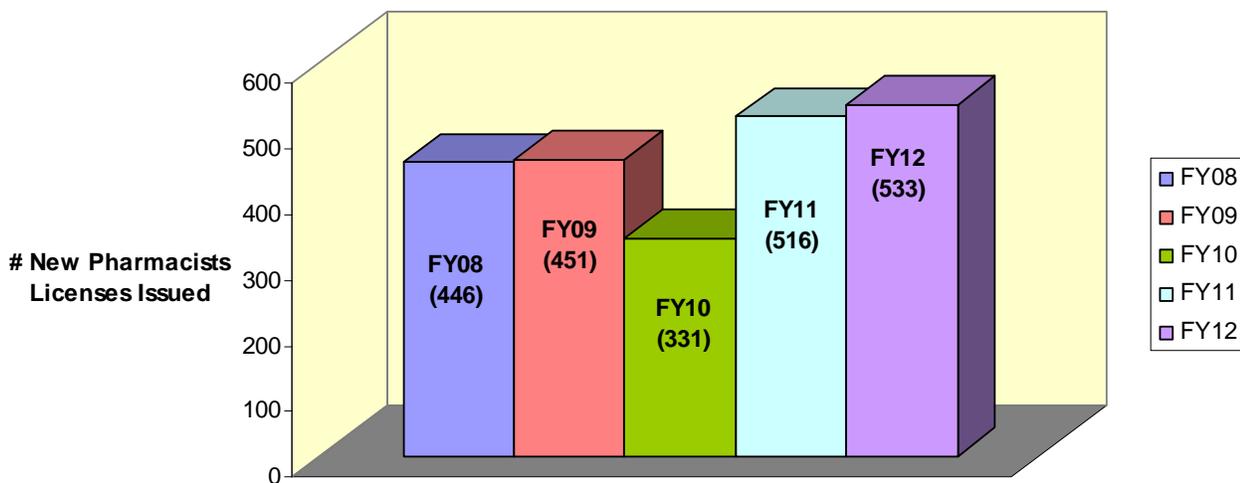
A. Licensing Summary

Pursuant to Chapter 338, the Board licenses and regulates pharmacists, intern pharmacists, pharmacies, drug distributors and pharmacy technicians. The following summarizes the Board's licensing activity for FY12:

LICENSING TOTALS	
Drug Distributors (<i>licensed & temporary</i>)	1,367
Drug Distributor Manufacturer Registrants	139
Intern Pharmacists	2,071
Pharmacists (<i>active and inactive</i>)	9,333
Pharmacies (<i>instate, non-resident and temporary</i>)	2,142
Pharmacy Technicians	17,849
TOTAL	32,901

B. Pharmacist Summary

NEW PHARMACIST LICENSES ISSUED



TOTAL PHARMACISTS IN-STATE AND OUT-OF-STATE

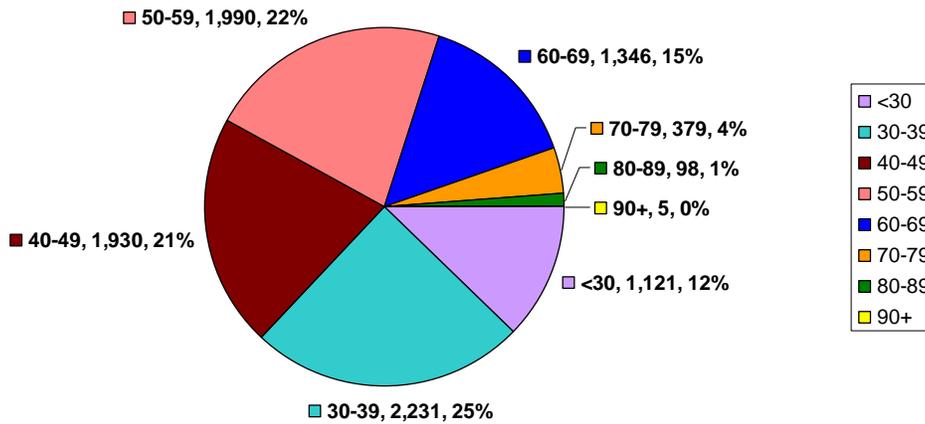
Active Licensees	9,100
Male	4,456
Female	4,644
Inactive Licensees	233
Male	126
Female	107
TOTAL LICENSED PHARMACISTS	9,333

PHARMACISTS RESIDING IN MISSOURI

Active Licensees	5,851
Male	2,953
Female	2,898
Inactive Licensees*	64
Male	42
Female	22

* Inactive pharmacists are not authorized to practice but remain licensed.

ACTIVE PHARMACISTS BY AGE GROUP (IN-STATE AND OUT-OF-STATE)



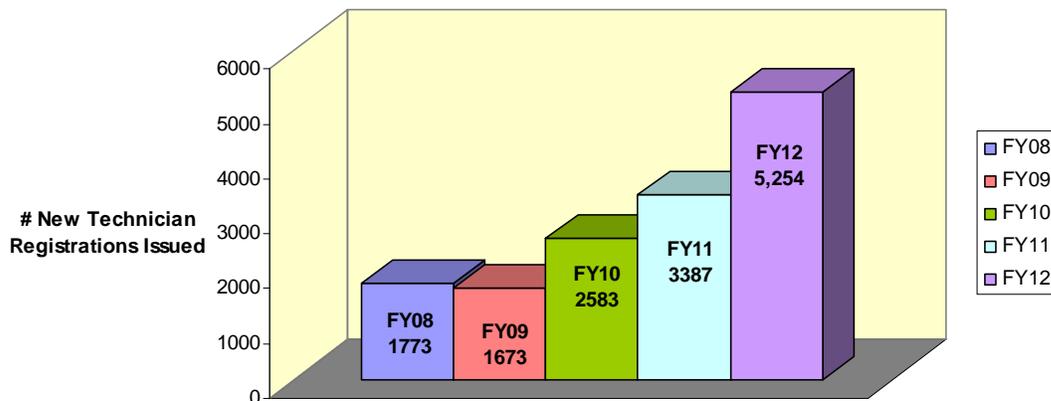
IMMUNIZATIONS

Pursuant to § 338.010, RSMo, pharmacists are authorized to administer medication by prescription order, and to administer influenza, shingles, meningitis and pneumonia vaccine pursuant to a protocol with a Missouri licensed physician, upon filing a *Notification of Intent* with the Board. The following Notifications of Intent were filed with the Board in FY12:

Administration by Medication Prescription Order	960
Immunization by Protocol	1,472

C. PHARMACY TECHNICIANS

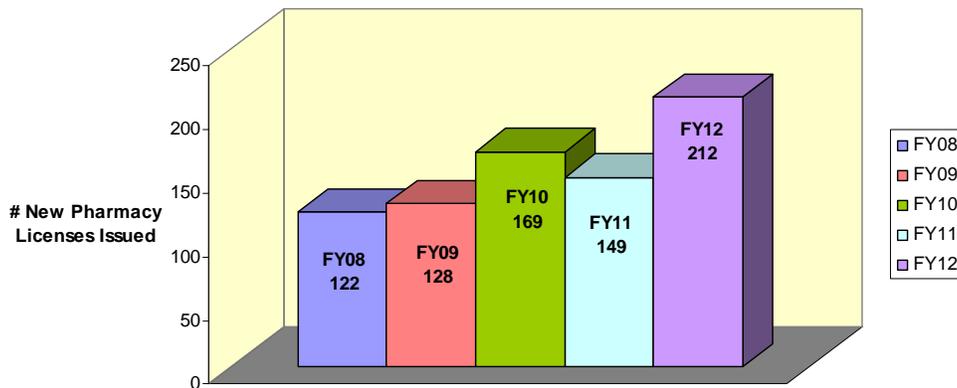
NEW PHARMACY TECHNICIAN REGISTRATIONS ISSUED



D. Pharmacy Summary

PHARMACY PERMIT TOTALS	
Instate Pharmacies	1,423
Non-Resident Pharmacies	674
Temporary Pharmacies	5
TOTAL	2,102

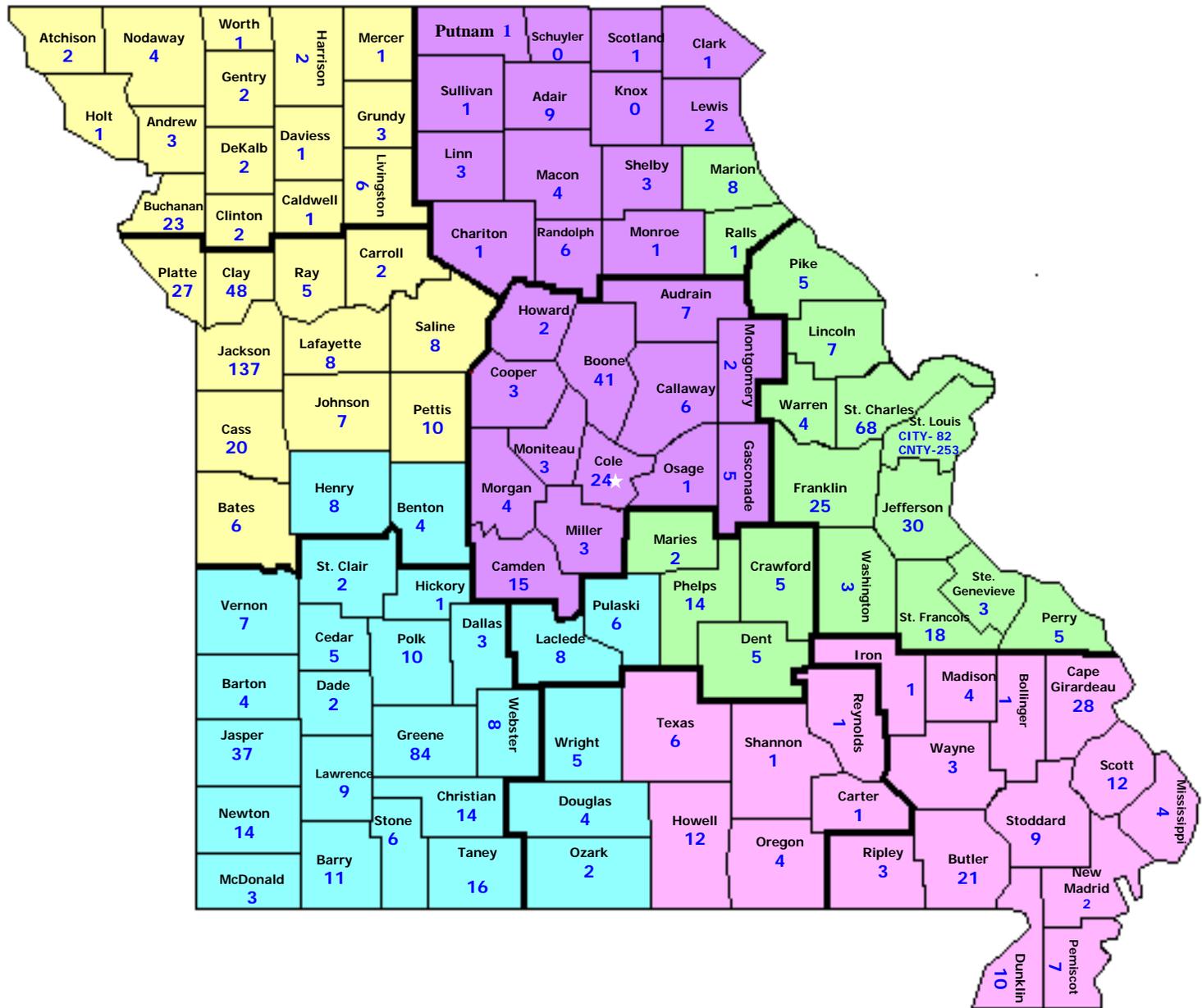
NEW PHARMACY PERMITS ISSUED



IN-STATE PHARMACIES BY CLASSIFICATION

Class A - Retail Pharmacies	282
Class B - Hospital Pharmacies.....	101
Class C - LTC Pharmacies.....	9
Class D - Non-Sterile Compounding.....	0
Class E - Radiopharmaceutical.....	12
Class F - Renal Dialysis Pharmacies.....	1
Class G - Medical Gas Pharmacies	0
Class H - Sterile Products.....	3
Class I - Consultant Pharmacy.....	4
Class J - Shared Services Pharmacy	1
Class K - Internet	0
Pharmacies with Multiple Classifications.....	1,010

Missouri Pharmacies by County



Number of Pharmacies/County*

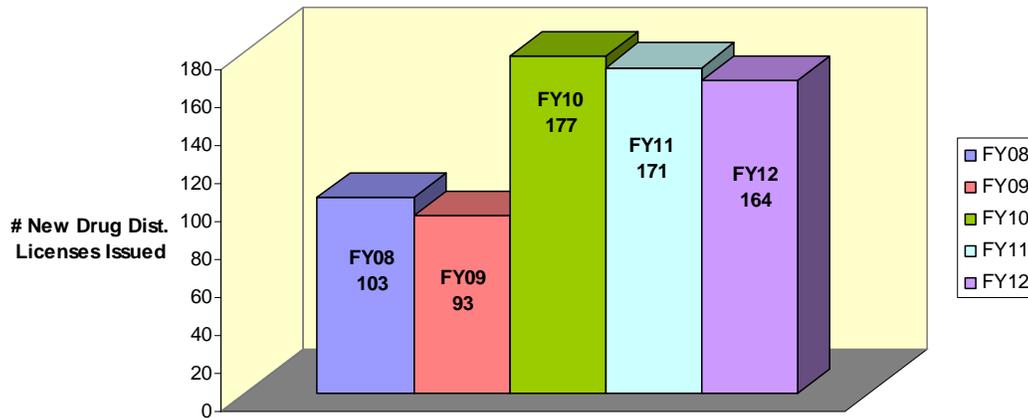
0 Pharmacies: 2 Counties	21-30: 6	51-60: 0	81-100: 2
1-10: 88	31-40: 1	61-70: 1	101-200: 1
11-20: 11	41-50: 2	71-80: 0	201+: 1

* Includes St. Louis City

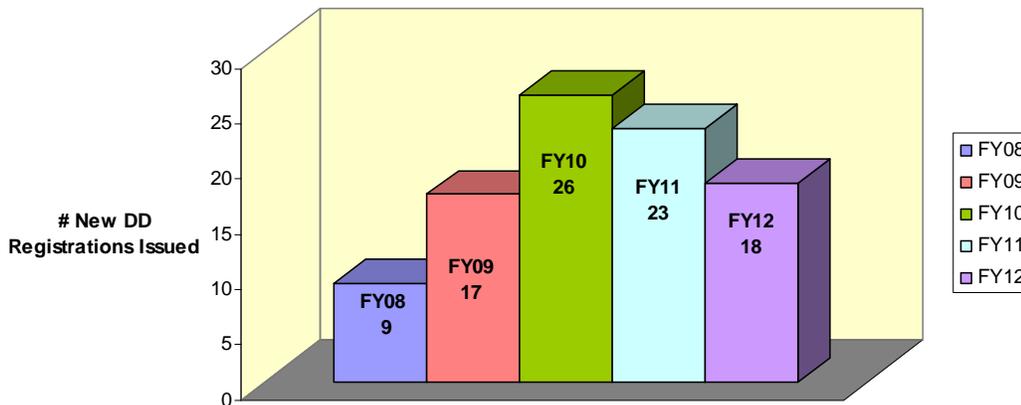
E. DRUG DISTRIBUTOR SUMMARY

DRUG DISTRIBUTORS/MANUFACTURERS	
Permanent Licensees	1,358
Temporary Licensees	8
Drug Distributor Manufacturer Registrants	139
TOTAL	1,505

NEW DRUG DISTRIBUTOR LICENSES ISSUED



NEW DRUG DISTRIBUTOR MANUFACTURER REGISTRATIONS ISSUED



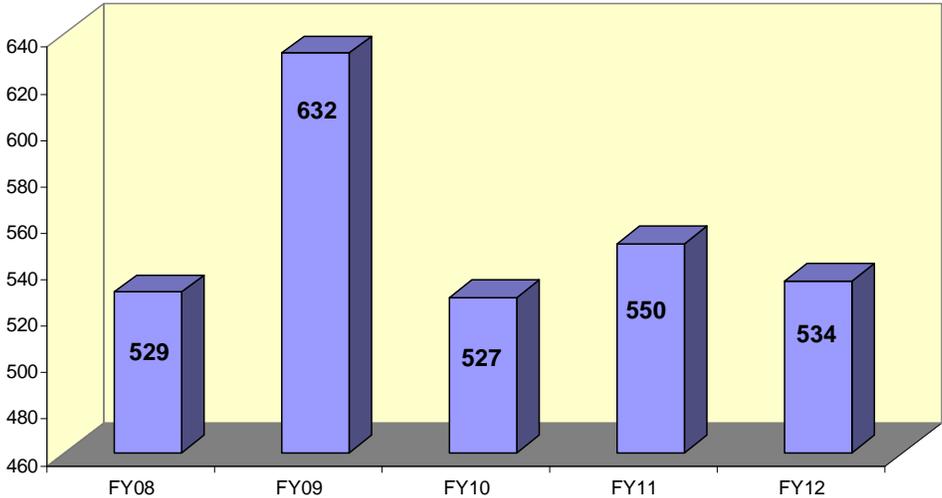
All out-of-state drug companies or manufacturers that ship/transfer legend drugs or devices into Missouri are required to obtain an out-of-state drug distributor license with this office. Upon application, out-of-state companies are issued a temporary license that is valid one (1) year or until the application has been completely processed by this office, at which time, a permanent license is issued or the application is denied by the Board.

All in-state drug companies that ship/transfer legend pharmaceuticals are also required to obtain licensure with this office. Additionally, any pharmacy that distributes legend drugs to an entity other than the consumer (the patient), such as other pharmacies, physicians, etc., must obtain a drug distributor's license if the distribution exceeds 5% of the pharmacy's total gross sales of legend products.

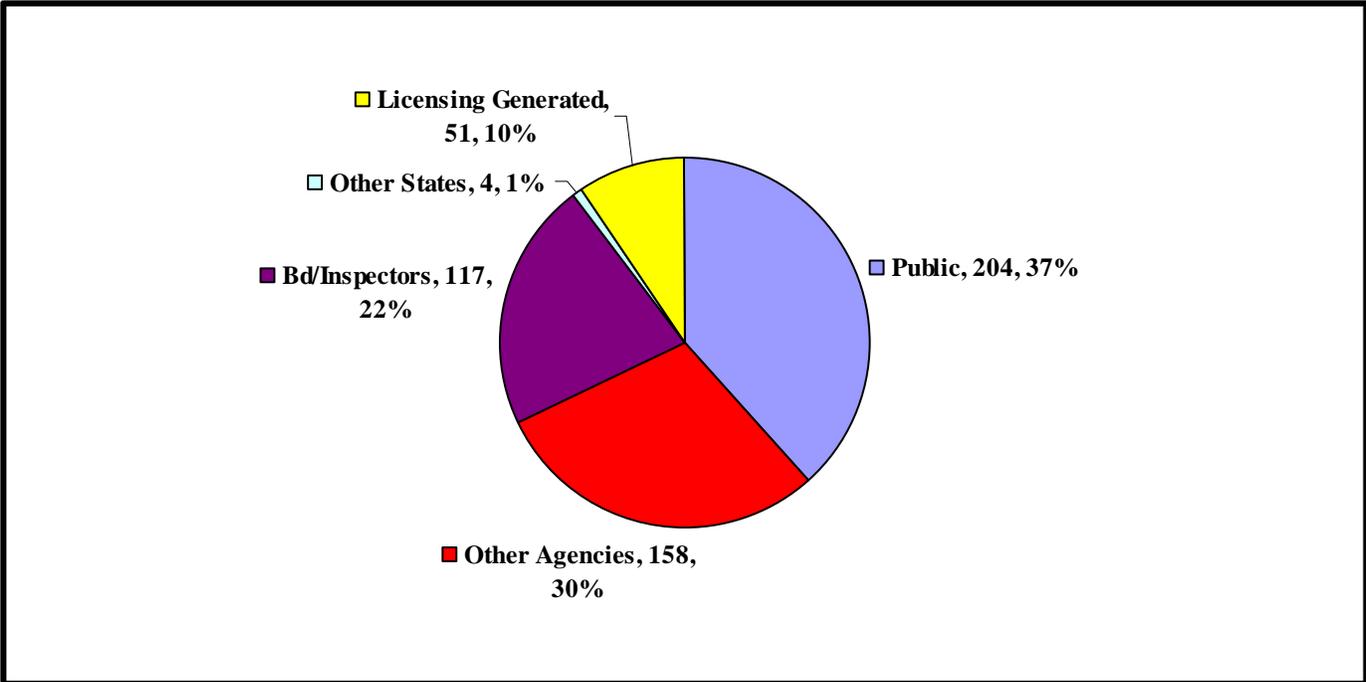
A. COMPLAINT SUMMARY

All matters investigated or officially reviewed by the Board are recorded as complaints and processed according to Board procedures.

TOTAL COMPLAINTS RECEIVED



Complaints were received from the following sources in FY12:



B. COMPLAINTS BY CATEGORY

Alcohol and Alcohol-Impaired Behavior	3
Allowing Unlicensed Person to Practice	1
Audit Finding	3
Compounding	14
Counseling	2
Department of Revenue Tax Compliance	145
Dishonesty	2
Dispensing Error	66
Disciplinary Action in Another State	23
Diversion	3
Drug Distribution Violations	2
Drugs	12
Ethical	1
False Application	1
Fraudulent Prescription	14
Immunization/Administration	39
Improper Controls	2
Improper Dispensing	41
Incompetence	1
Insurance Fraud	2
Licensure Applicant	40
Loss of Drugs	4
No Jurisdiction	1
Patient Abuse	1
Pharmacy Permit Violations	13
Practicing without a License	36
Recordkeeping	19
Repackaging/Prepackaging	1
Theft of Drugs	26
Theft of Drugs – Self-Administration	2
Theft of Money	8
Unauthorized Dispensing	4
Violation of Disciplinary Order	2

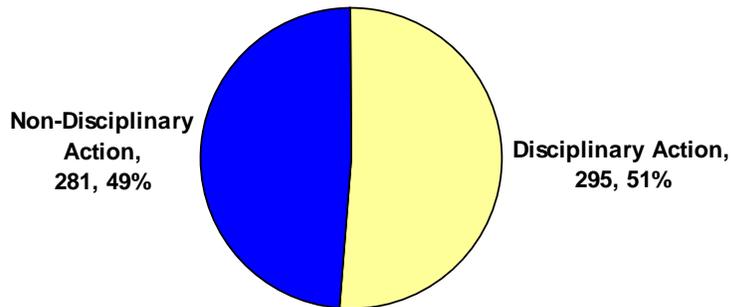
COMPLAINT HANDLING

COMPARISON OF TOP COMPLAINT CATEGORIES

	Dispensing Errors	Improper Dispensing	Loss of Drugs	Pharmacy Permit Violations	Practicing w/o License	Theft of Drugs
FY 12	66	41	4	13	36	26
FY 11	46	41	19	6	27	42
FY 10	42	32	25	29	71	44
FY 09	54	7	20	41	38	40
FY 08	31	12	12	64	33	45
FY 07	46	20	11	43	37	27

C. COMPLAINT DISPOSITIONS

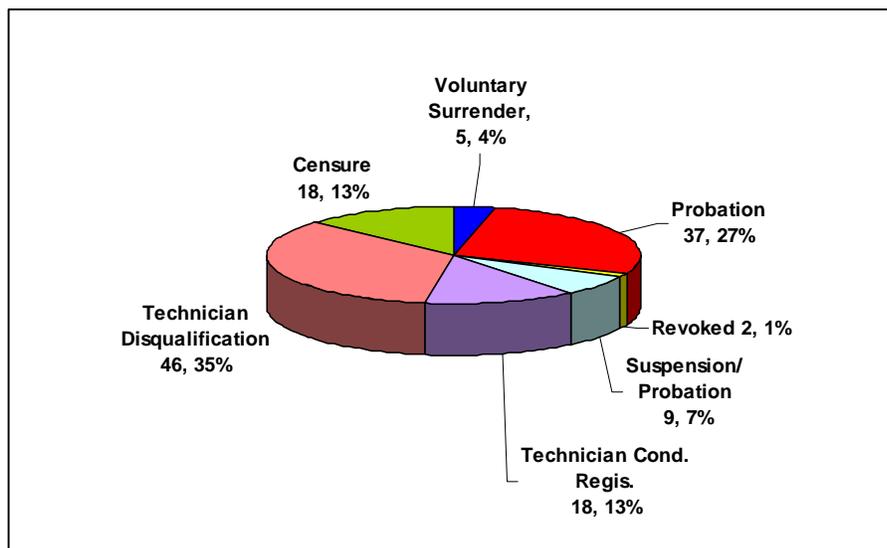
The Board issued final dispositions on approximately 576 complaints in FY12 including, 160 Department of Revenue tax suspension complaints and 416 non-tax related complaints.* The 416 non-tax related complaints were disposed of as follows:



* Includes complaints received in prior fiscal years but finally determined in FY12

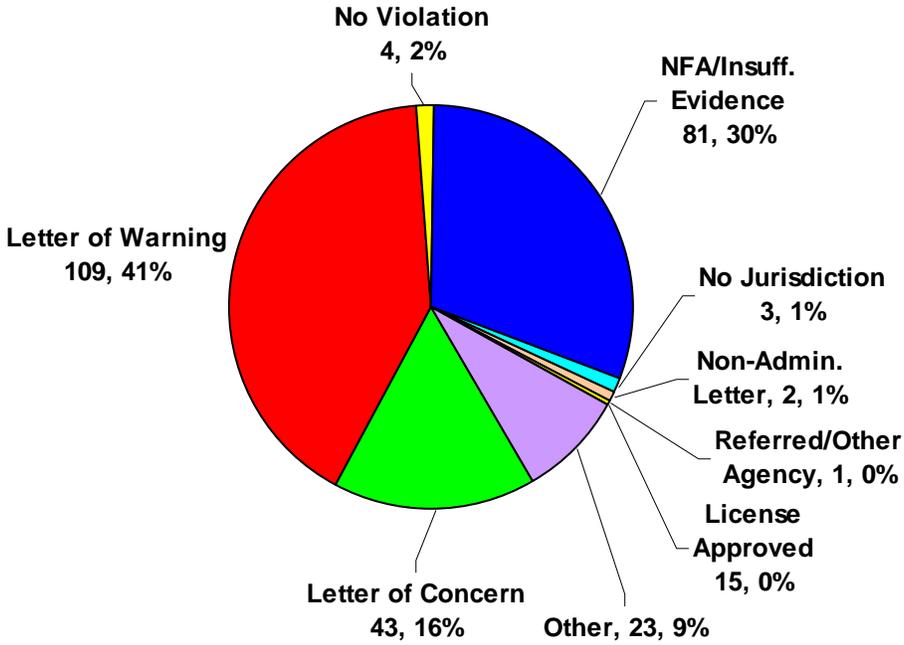
D. SUMMARY OF DISCIPLINARY COMPLAINT RESOLUTIONS

(#, %)



* Includes discipline related to all licenses, permits and registrations.

E. SUMMARY OF NON-DISCIPLINARY COMPLAINT RESOLUTIONS



DISCIPLINARY ACTIONS

A. SUMMARY OF DISCIPLINARY ACTION

During FY12 the Board issued disciplinary action in approximately 295 cases as summarized below:

DISCIPLINARY ACTIONS	
Intern Pharmacists Suspended 324.010 <i>(tax purposes)</i>	1
Technician Registrations Suspended 324.010 <i>(tax purposes)</i>	159
Technicians Disqualified	46
Technicians Placed on Conditional Employment	18
Pharmacist Licenses Censured	8
Pharmacist Licenses on Probation	17
Pharmacist Licenses Suspended Followed by Probation	9
Pharmacist Licenses Revoked	2
Pharmacist Voluntary Surrender	2
Pharmacy Permits Censured	3
Pharmacy Permits on Probation	16
Pharmacy Permits Voluntary Surrendered	2
Drug Distributor Licenses Censured	7
Drug Distributor Licenses on Probation	4
Drug Distributor Voluntary Surrender	1
TOTAL	295

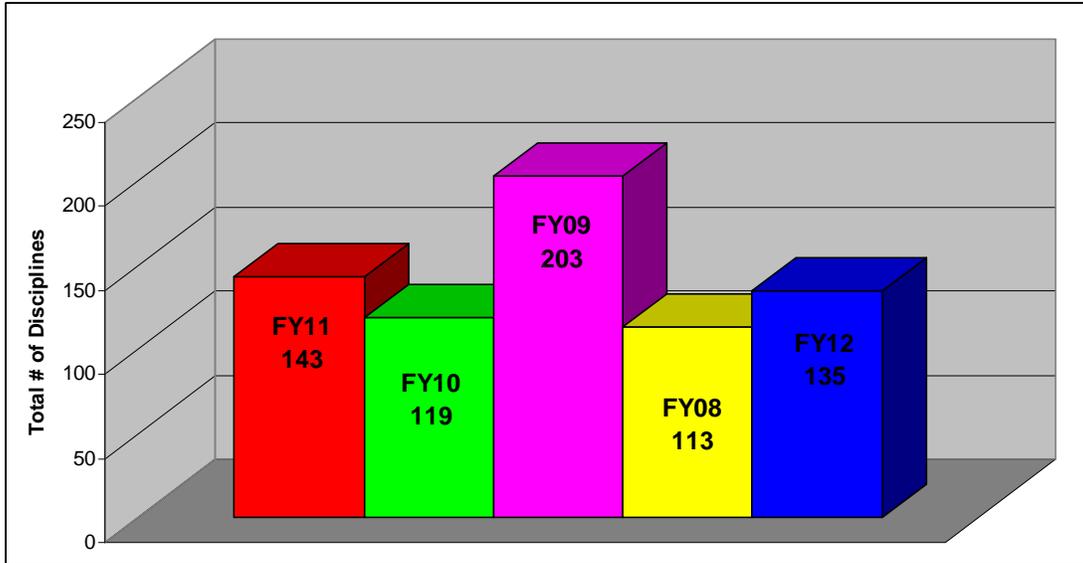
Additionally, the Board handled/processed the following disciplinary actions:

TYPES OF DISCIPLINARY ACTIONS	
Complaints Filed with Administrative Hearing Comm.	15
Disciplinary Hearings	3
Felony Hearings	0
Violation of Discipline Hearings	6
Settlement Agreements	59
Probationary Licenses Issued Pursuant to § 324.038, RSMo	5

NOTE: Due to the time frame from initial Board review to final disposition, the totals shown above will not necessarily balance. A case may be reviewed by the Board, referred to legal counsel, filed with the Administrative Hearing Commission and be decided by disciplinary hearing, consent order or otherwise, in separate fiscal years.

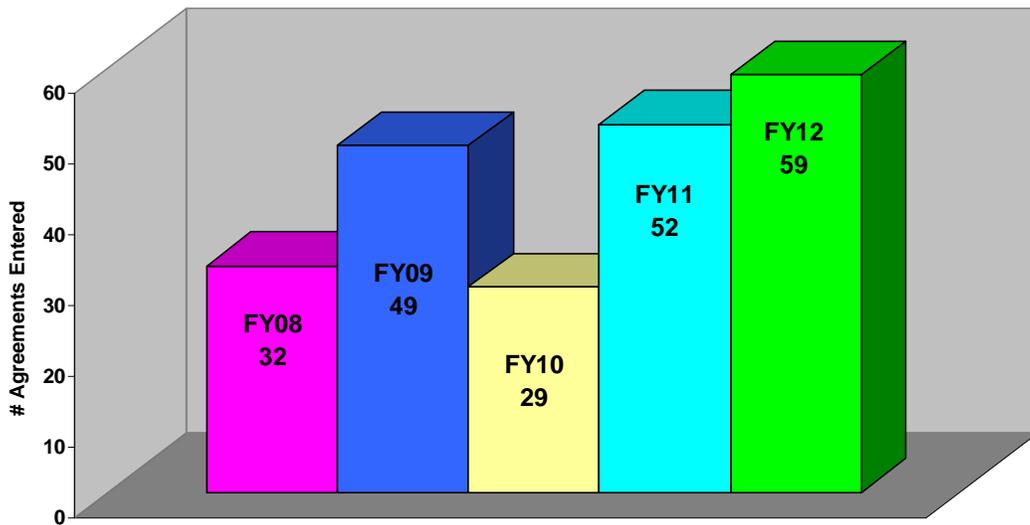
B. HISTORICAL COMPARISONS OF DISCIPLINARY ACTION

Total Board Disciplinary Actions By Fiscal Year*

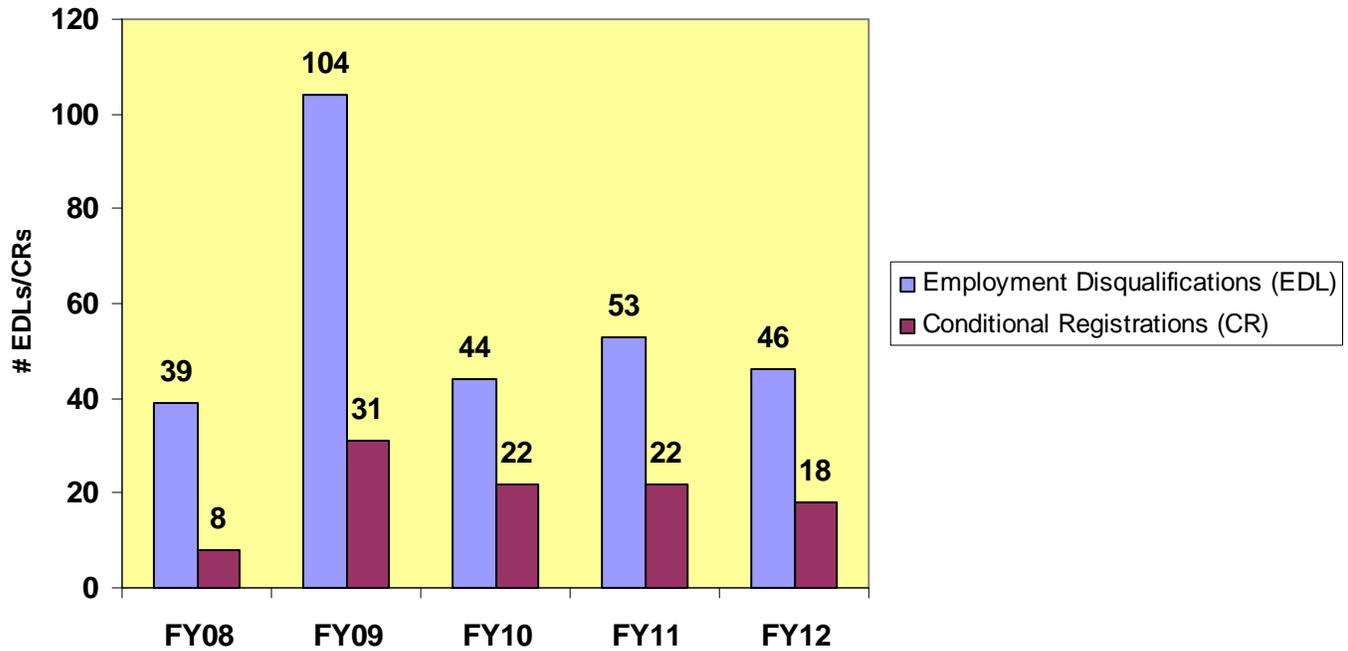


* Does not include suspensions for tax non-compliance pursuant to § 324.010.

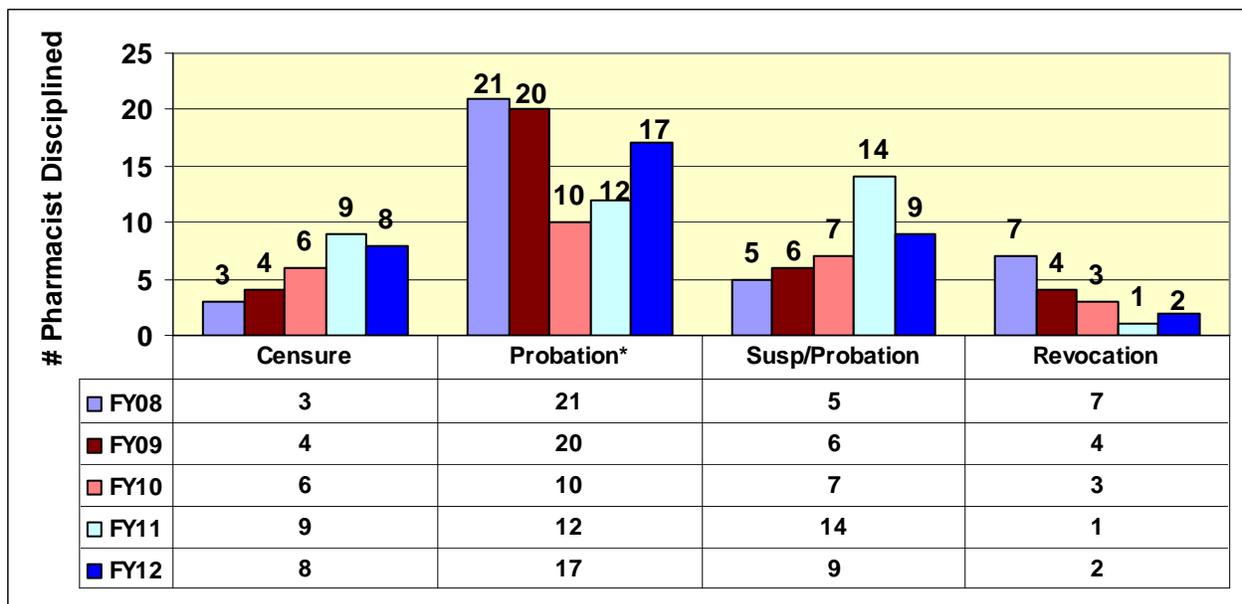
Dispositions By Settlement Agreement



Pharmacy Technician Discipline



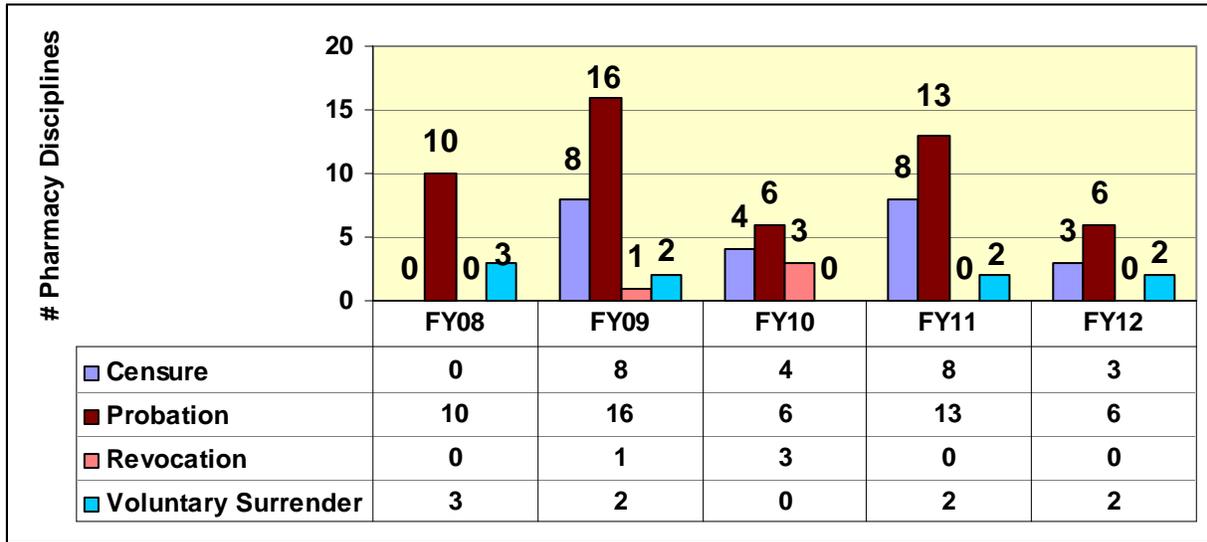
Pharmacist Discipline



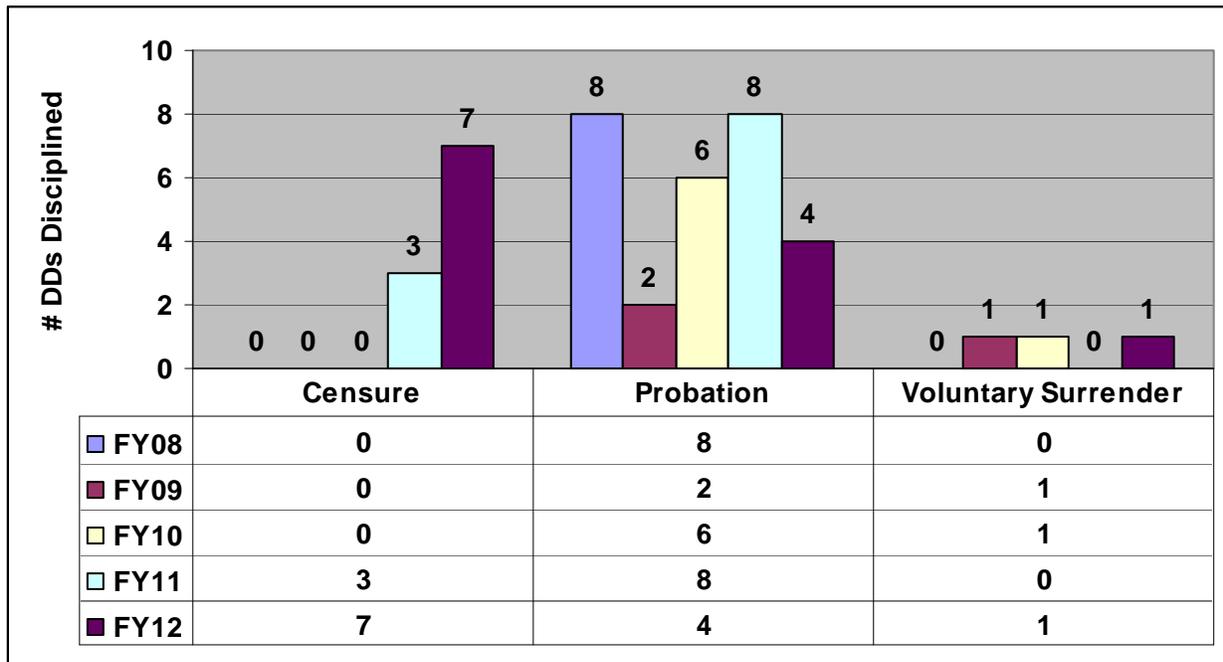
* Includes restricted/probated pharmacist licenses issued pursuant to § 324.038, RSMo

DISCIPLINARY ACTIONS

Pharmacy Discipline



Drug Distributor Discipline



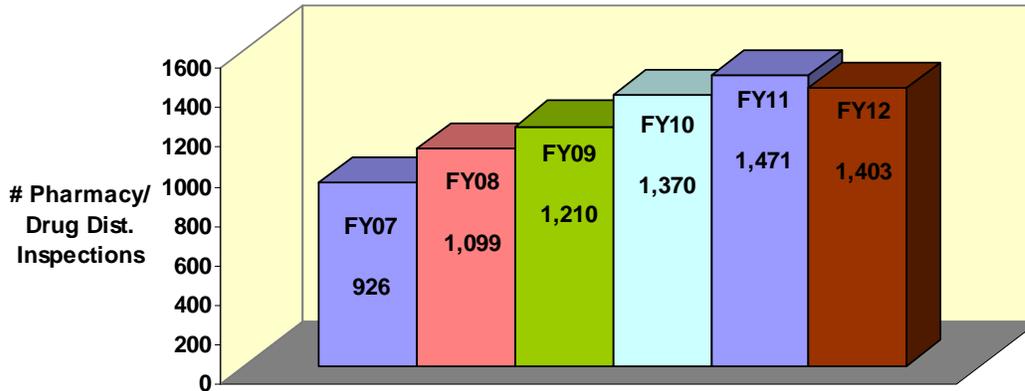
* Includes drug distributors and drug distributor registrants. No drug distributor revocations were entered during the FYs above.



A. INSPECTION SUMMARY

The Board conducts new and routine inspections for all Missouri located pharmacies and drug distributors. During FY12, Board inspectors conducted a total of 1,403 inspections of pharmacies and drug distributors throughout the state.

INSPECTION SUMMARY



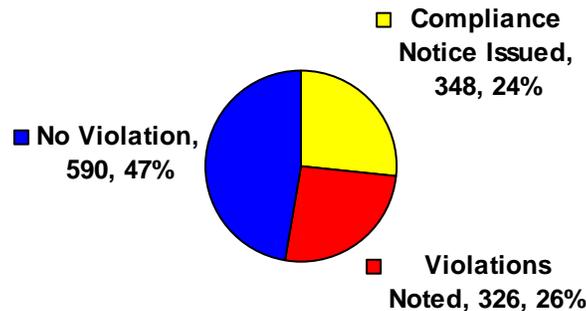
* Total does not include follow-up inspections or investigations.

B. INSPECTION FINDINGS

At the conclusion of an inspection, the inspector may initiate one of the following resolutions:

- **Observation Report:** Issued if no compliance issues are identified at the time of inspection or if compliance violations are noted that can generally be corrected and do not require further review/documentation.
- **Compliance Notice:** Issued if the inspection reveals compliance concerns that require official documentation of corrective measures. A compliance notice may also be issued for multiple or repeat compliance violations.
- **Quality Assurance Report:** Issued if there is a specific question regarding the dispensing/handling of a particular prescription and/or drug.
- **Investigation:** The Board may initiate an investigation in addition to the above options if additional factual information may be necessary to assess compliance

FY12 INSPECTION RESULT SUMMARY



* Includes inspection results for follow-up inspections and investigations

INSPECTOR TERRITORY ASSIGNMENTS

Frank VanFleet	George McConnell	Tom Glenski	Dan Vandersand	Barbara Wood	Steven S. Smith	Sid Werges	Andi Miller
Barton	Barry	Adair	St. Charles	Bollinger	Clark	Audrain	Benton
Bates	Christian	Andrew	St. Louis City 63101, 63102, 63103, 63104, 63106, 63107, 63109, 63111, 63116, 63117, 63118, 63119, 63123, 63128, 63131, 63139	Butler	Knox	Boone	Buchanan
Cass	Douglas	Atchison		Cape Girardeau	Lewis	Callaway	Caldwell
Cedar	Greene	Davies		Carter	Lincoln	Cole	Camden
Dade	Howell	DeKalb		Dunklin	Marion	Cooper	Carroll
Jackson	Jasper	Gentry		Iron	Pike	Crawford	Chariton
St. Clair	Lawrence	Grundy		Jefferson	Ralls	Dallas	Clay
Vernon	McDonald	Harrison		Madison	Scotland	Dent	Clinton
	Newton	Holt		Mississippi	Shelby	Franklin	Henry
	Oregon	Linn		New Madrid	St. Louis City 63044, 63108, 63110, 63112, 63113, 63114, 63115, 63120, 63130, 63138, 63141, 63147	Gasconade	Hickory
	Ozark	Livingston		Pemiscot		Howard	Johnson
	Stone	Mercer		Perry		Laclede	Lafayette
	Taney	Nodaway		Reynolds		Maries	Macon
	Texas	Putnam		Ripley		Miller	Pettis
	Webster	Schuyler		Scott		Moniteau	Platte
	Wright	Sullivan		Shannon		Monroe	Polk
		Worth	St. Francois	St. Louis County 63031, 63033, 63042, 63043, 63044, 63045, 63074, 63110, 63114, 63115, 63121, 63124, 63130, 63132, 63133, 63134, 63135, 63136, 63137, 63138, 63141, 63146		Montgomery	Randolph
			St. Genevieve			Morgan	Ray
			St. Louis County 63011, 63017 63021, 63040, 63088			Osage	Saline
					Phelps		
					Pulaski		
					St. Louis County 63069		
			Stoddard		Warren		
			Washington				
			Wayne				

COMPOUNDED DRUG TESTING

In 2003, the Board initiated a program to test drug preparations compounded by pharmacies. All preparations are tested for potency and, if applicable, sterility and endotoxins. The tables listed below are for the fiscal year ending June 30, 2012:

Dosage Form	Tests Performed
Capsule	40
Injection	3
I.V. solution	5
Lollipop	1
Oral solution	1
Oral suspension	4
Powder	3
Suppository	2
Transdermal	1
Troche	3

Test Results	Tests Performed	Percentage
Satisfactory	56	88.9%
Unsatisfactory	7	11.1%
Total	63	100%

All unsatisfactory results were related to potency failures. An acceptable potency range is considered +/- 10% of the expected potency, unless a U.S.P. monograph states a different range for a specific preparation. Failing potency results ranged from 3.3% to 226.6%. Pharmacies are notified of unsatisfactory results and asked to complete a quality assurance review of their compounding practices and provide a corrective action plan.

Drugs With Unsatisfactory Results
Boric Acid 600 mg. capsules
Cefazolin I.V. solution
Estradiol Aliquot (powder)
Estradiol/Progesterone/Testosterone capsules
Hydrocortisone/Lidocaine/Nifedipine suppositories
T (3) Liothyronine capsules
Ursodiol capsules



A. RULE CHANGES

The Board continued to review Missouri’s pharmacy rules to ensure appropriate and consistent regulation. The following rules were pending, approved and/or promulgated in FY12:

PROMULGATED RULES	
20 CSR 2220-2.145	Minimum Standards for Multi-Med Dispensing
20 CSR 2220-2.675	Standards of Operation/Licensure for Class L Veterinary Pharmacies

PENDING RULES <i>(Filed with the Missouri Secretary of State/Promulgation pending)</i>	
20 CSR 2220-2.013	Prescription Delivery Requirements
20 CSR 2220-6.060	General Provisions (Medication Therapy Services)
20 CSR 2220-6.070	Certificate of Medication Therapeutic Plan Authority
20 CSR 2220-6.080	Medication Therapy Services by Protocol

APPROVED RULES <i>(Rules approved by the Board/Pending approval for filing)</i>	
20 CSR 2220-2.017	Non-Electronic (Manual) Prescription Records
20 CSR 2220-2.018	Prescription Requirements
20 CSR 2220-2.080	Electronic Prescription Records
20 CSR 2220-2.083	Electronic Record-Keeping Systems
20 CSR 2220-7.010 – 7.090	Revision of Missouri Licensing Rules (pharmacists, intern pharmacists and temporary pharmacists)



A. STRATEGIC PLANNING INITIATIVES

As part of its regulatory mission, the Board holds an annual strategic planning meeting to assess Board operations and review Missouri's regulation of pharmacy practice. The public is invited to suggest proposals and participate in the annual review. The Board's FY12 strategic planning meeting was held on April 20, 2011, resulting in the adoption of the following goals/initiatives for FY12:

- **Hospital Pharmacy:** The Board approved formulating a Working Group to review Missouri's regulation of and jurisdiction over hospital in-patient pharmacy services.
- **Legislative Proposals:** The Board voted to request authorization to pursue the following legislative proposals during the 2011-2012 legislative session:
 - **Automated/Remote Dispensing Systems:** Would grant the Board statutory authority to establish a separate pharmacy permit classification for automated dispensing systems.
 - **Receipt/Purchase of Medication:** Would authorize the Board to promulgate rules to allow Missouri licensed pharmacies and drug distributors to receive/purchase medication from entities not licensed with the Board (i.e.- to accommodate emergency medical needs/drug shortages/patient returns).
 - **Pharmacy Technicians:** Would establish education and/or training requirements and qualifications for obtaining a Missouri pharmacy technician registration.
- **"Compliance Is Key" Initiative:** As part of its mission to protect the public, the Board voted to launch a compliance initiative in FY 12 aimed at increasing voluntary compliance with Missouri pharmacy law through education, awareness and assessment. As part of the initiative, the Board completed the following during FY 12:

WEBINARS (*free continuing education credit was granted*):

- 2012 Review of Missouri's Immunization/Administration Regulations
- Pharmacy Security & Drug Diversion Awareness
- Compliance Keys for Drug Distributors
- Compliance Keys for the Pharmacist-in-Charge & Pharmacy Managers/Supervisors
- Missouri Bureau of Narcotics & Dangerous Drugs Regulatory Update
- Drug Distributor Compliance Keys

PUBLICATIONS

- Drug Distributor Compliance Guide
- Drug Distributor Compliance Keys
- Immunization/Administration Checklist
- Missouri Pharmacy Practice Guide
- Pharmacist-In-Charge FAQ
- Pharmacy Compliance Top 10
- Pharmacy Inspection Guide

ASSESSMENT TOOLS

- **Missouri Pharmacy Self-Assessment** (An interactive, online self-assessment form to evaluate 107 compliance elements)
- **Missouri Pharmacy Practice Guide Exam** (An online exam that reviews and tests comprehension of the Missouri Pharmacy Practice Guide)

