

*****AMENDED*** MEETING NOTICE**

**Missouri Board of Pharmacy
CONFERENCE CALL**

**Missouri Division of Professional Registration
3605 Missouri Boulevard
Jefferson City, MO 65109**

**April 15, 2020
1:00 p.m.**

Notice is hereby given that the Missouri Board of Pharmacy will be meeting at 1:00 p.m. on April 15, 2020 via conference call. A tentative agenda is attached. If any member of the public wishes to attend the meeting, s/he may join the WebEx meeting by:

1) Joining online at:

<https://stateofmo.webex.com/stateofmo/j.php?MTID=mcb4e324395530167d8f6337c48cb209e>

Meeting Code: 284 841 977

2) Calling:

Phone #: 650-479-3207

Access Code: 284 841 977

****Public participants will be required to provide a name and e-mail address when joining the WebEx meeting online. WebEx will provide a conference call telephone number to access the audio portion of the call after you join. Telephone charges may apply as assessed by your service provider. ****

Except to the extent disclosure is otherwise required by law, the Missouri Board of Pharmacy is authorized to close meetings, records and votes pursuant to Section 610.021(1) and (14) and section 324.001.8 and .9, RSMo. If the meeting is closed, the appropriate section will be announced to the public with the motion and vote recorded in open session minutes.

Notification of special needs as addressed by the Americans with Disabilities Act should be forwarded to the Missouri Board of Pharmacy, P O Box 625, 3605 Missouri Blvd., Jefferson City, Missouri 65102, or by calling (573) 751-0091 to ensure available accommodations. The text telephone for the hearing impaired is (800) 735-2966.

*****AMENDED*** MEETING NOTICE**
Missouri Board of Pharmacy
CONFERENCE CALL

Missouri Division of Professional Registration
3605 Missouri Boulevard
Jefferson City, MO 65109

April 15, 2020
1:00 p.m.

**Newly added items highlighted in red.*

OPEN SESSION AGENDA

- #1. Call to Order: Douglas Lang, RPh, President
- #2. Roll Call
- #3. Approval of Minutes
 - a. January 7-8, 2020
 - b. February 19, 2020
- #4. COVID-19/Emergency Response Updates
 - a. Office Updates
 - b. Licensing Updates
 - c. Inspector Updates
 - d. Board waivers
 - e. Medication Dispensing
 - f. Additional statutory/rule waivers
- #5. Drug Utilization Review/Revision of 20 CSR 2220-2.195
 - a. Discussion rule draft
- #6. Approval of Special Sites/Non-Pharmacist Preceptors
 - a. Covance Inc (New)
 - b. East Coast Institute for Research (Renewal)
 - c. Goa College of Pharmacy (Renewal)
 - d. Jewell Osco-Albertson's Safeway District Office (Renewal)
 - e. Komfo Anyoke Teaching Hospital (Renewal)
- #7. Executive Director Office Updates
 - a. Rule status report
 - b. Licensing/Renewal updates
 - c. NABP Update
 - d. Draft FY19 Annual report
 - e. 2020 Legislative Update

#8. Future Meeting Dates/Times

- a. May/June 2020 Meeting
- b. Strategic Planning

#9. Final Orders of Rulemaking

- a. 20 CSR 2220-2.710 (Pharmacy Technician and Intern Supervision)
 - i. MHA Comment
 - ii. Draft Final Order
 - iii. Filed Rule
- b. 20 CSR 2220-2.725 (Remote Data Entry)
 - i. GLO & Associates Comment
 - ii. Draft Final Order
 - iii. Filed Rule

#10 Adjournment

- #3. Approval of Minutes
 - a. January 7-8, 2020
 - b. February 19, 2020

OPEN MINUTES
Missouri Board of Pharmacy

JANUARY 7-8, 2020

The Broadway Columbia
1111 E. Broadway
Columbia, MO

The Missouri Board of Pharmacy met in open session during the times and dates stated in the following minutes. Each item in the minutes is listed in the order discussed.

Board Members Present

Douglas Lang, R.Ph., President
James Gray, PharmD., Vice-President
Christian Tadrus, PharmD, Member
Pam Marshall, R.Ph., Member
Colby Grove, PharmD., Member
Christina Lindsay, PharmD., Member
Anita Parran, Public Member

Staff Present

Kimberly Grinston, Executive Director
Tom Glenski, R.Ph., Chief Inspector
Jennifer Boehm, Administrative Coordinator
Bennie Dean, R.Ph, Inspector
Katie DeBold, PharmD., Inspector
Sarah Decker, Compliance Coordinator
Lisa Everett, R.Ph., Inspector
Scott Spencer, R.Ph., Inspector
Dan Vandersand, R.Ph., Inspector
Elaina Wolzak, R.Ph., Inspector

Others Present

Daryl Hylton, Legal Counsel

President Douglas Lang called the meeting to order at approximately 8:09 a.m. on January 7, 2020.

MOTION FOR CLOSED SESSION (8:09 A.M.)

A motion was made by Christian Tadrus, seconded by Christina Lindsay, that the Board go into closed session and that all votes, to the extent permitted by law, pertaining to and/or resulting from this closed meeting be closed under Section

610.021(1), (4), (5), (6), (7), (13) and (14), RSMo. Motion passed 6:0:0:0 by roll call vote as follows:

Colby Grove – Yes

James Gray- Yes

Christian Tadrus- Yes

Pamela Marshall – Yes

Anita Parran – Yes

Christina Lindsay- Yes

RETURN TO OPEN

By motion duly made, seconded, passed and recorded in closed session minutes, the Board reconvened in open session at approximately 8:29 a.m. on January 7, 2020 and roll call was taken.

#3- Approval of Open Session Minutes

No minutes to approve.

#4- Public Comments on Future Agenda Topics

No public comments received.

#5- Licensing Update

- Current License Statistics
- Foreign Graduate Certification Changes

DISCUSSION:

Current License Statistics-

- Kimberly Grinston reported the Board has approximately 40,000 licensees; over 21,800 are technicians, which is a record for the Board.
- Ms. Grinston reported technician applications continue to be processed the quickest and pharmacist applications have the longest processing time. The delay with pharmacist applications is because the Board has to wait for the students to take the exam. The current wait time for the exam is 92 days.
- Pamela Marshall noted the Board's licensing totals show a 2:1 ratio of technicians to pharmacists. Ms. Marshall further noted the need for a standard training program for technicians.
- Board discussion held on the number of applications compared to available staff to process the applications. Christian Tadrus stated the processing times are efficient with an office staff of 7 people.
- Kimberly Grinston noted the Board of Pharmacy is the only Board to renew every 6 months.

Foreign Graduate Certification Changes- Kimberly Grinston reported NABP has changed the FPGEC process. Foreign graduates will now be allowed to test only one time a year.

#6- Board Member/Inspector Updates

DISCUSSION: The following reports were received:

- Lisa Everett attended the National Association of State Controlled Substances Authorities.
- Dan Vandersand attended the FDA training for cGMPs.
- Andi Miller and Daryl Hylton attended the NABP Compliance officer/ legal counsel forum
 - Mr. Hylton noted it was a good experience with several Boards represented.
 - Andi Miller will provide a report during the April meeting.
- Inspectors held their annual December inspector training/meeting.

#7- 2020 Legislative Update

- 338.056 (Generic Substitution)
- 338.057 (LTC Medication Distribution)
- 338.058 (Therapeutic Substitution)
- 338.150 (Inspection Costs)
- 338.200 (Emergency Dispensing)
- 338.202 (RPh Adaptation)
- 324.038 & 621.120 (AHC Jurisdiction)

DISCUSSION: Board consensus to send the legislative package to the associations for filing. Board Staff will circulate proposals to the Missouri Pharmacy Association (MPA), Missouri Hospital Association (MHA), and Missouri Society of Healthcare Pharmacists (MSHP). President Lang noted the Board should include other stakeholders that may have an interest in proposing legislation.

#8- Special Site/Non-Pharmacist Preceptor Applications

- Makelle University (Renewal)
- Marion VA Medical Center (Renewal)
- Sinfonia Rx Medication Management Center (New)

DISCUSSION: Tom Glenski recommended approval of the special site/non-pharmacist preceptors listed. **A motion was made by James Gray, seconded by Christina Lindsay, to approve the special sites and non-pharmacist preceptors listed for 500 hours. Motion passed 6:0:0:0 by roll call vote as follows:**

Colby Grove – Yes	James Gray- Yes	Christian Tadrus- Yes
Pamela Marshall – Yes	Anita Parran – Yes	Christina Lindsay- Yes

#9- 2020 Missouri Pharmacy Practice Guide

- Draft 2020 Revisions
- Sterile Compounding Section
- Pharmacy Self-Assessment Form

DISCUSSION:

- Board members noted the first sentence in Section O.2 of the Practice Guide is not complete.
- Christian Tadrus suggested we reference the Comprehensive Addiction and Recovery Act (CARA). Kimberly Grinston noted she would add a sentence that refers them to BNDD’s guidance on CARA.
- Douglas Lang noted we need an intern section.
- Christina Lindsay requested to note that suicide prevention continuing education is recommended, but not required.
- Tom Glenski recommended mailing the Practice Guide to licensees. Board consensus to mail the practice guide to permit holders. **A motion was made by Pamela Marshall, seconded by Colby Grove, to approve the Practice Guide as amended. Motion passed 6:0:0:0 by roll call vote as follows:**

Colby Grove – Yes	James Gray- Yes	Christian Tadrus- Yes
Pamela Marshall – Yes	Anita Parran – Yes	Christina Lindsay- Yes

DISCUSSION: Christian Tadrus suggested posting the Pharmacy Self- Assessment Form as a fillable form. **A motion was made by Christian Tadrus, seconded by Pamela Marshall, to approve the Self-Assessment Form. Motion passed 6:0:0:0 by roll call vote as follows:**

Colby Grove – Yes	James Gray- Yes	Christian Tadrus- Yes
Pamela Marshall – Yes	Anita Parran – Yes	Christina Lindsay- Yes

DISCUSSION: Kimberly Grinston noted the Practice Guide quiz would be brought back in February. Tom Glenski asked if the Board would consider splitting the quiz into sections. Board consensus to explore the idea.

#13- Drug Repositories

- DHSS Website/FAQ: <https://health.mo.gov/safety/drugrepository/>
- Section 196.970 - 196.984
- DHSS Rules

DISCUSSION: President Lang noted a lack of pharmacies participating in Missouri’s drug repository and suggested reevaluating the statutory language to better implement the program. Board consensus to research successful repository programs from other states and return to the Board for review.

#14- Quality Assurance/Quality Improvement Programs

DISCUSSION: Pamela Marshall requested the Board revitalize the Quality Assurance /Improvement subcommittee. Ms. Marshall further recommended reaching out to the schools to discuss the patient counseling educational program again. Christian Tadrus noted the Board may need to add Drug Utilization Review issues to the discussion. Tom Glenski recommended moving forward with Continuous Quality Improvement legislation. Board consensus to work on a possible legislative approach. Pamela Marshall noted the need to incentivize error reporting.

#15- Foreign Drug Distributor Licensing Requirements

- § 338.337, RSMo
- 20 CSR 2220-5.030
- 20 CSR 2220-5.040
- 20 CSR 2220-5.050

DISCUSSION: Board consensus to hold pending federal action on foreign drug distributor requirements.

#7- 2020 Legislative Update (Cont.)

DISCUSSION: Ron Fitzwater noted the Missouri Pharmacy Association (MPA) had preliminary legislation discussions and were initially comfortable with the Board’s proposal. Mr. Fitzwater stated final proposed language will be sent to the full MPA Board shortly.

#16- 2019-2020 Strategic Focus Goals

- 2019-2020 Survey Results
- 2019-2020 New Suggestions

A motion was made by Pamela Marshall, seconded by Anita Parran, to accept the strategic focus goals. Motion passed 6:0:0:0 by roll call vote as follows:

Colby Grove – Yes	James Gray- Yes	Christian Tadrus- Yes
Pamela Marshall – Yes	Anita Parran – Yes	Christina Lindsay- Yes

#17- Executive Director Updates

- a. Financial Update
- b. Pending Rules
- c. 2020 Legislation
- d. Office/Staff Updates
- e. NABP Update
- f. Rx Cares for Missouri Update/Applications
 - 1. Children’s Mercy Employee Wellness Center

2. Downtown Drug
 3. Hines Street Pharmacy LLC
 4. Medicenter Pharmacy
 5. Medley Pharmacy
 6. Rogersville Pharmacy
 7. Sinks Pharmacy (#2005000321)
 8. Sinks Pharmacy (#2005000325)
 9. Sinks Pharmacy (#2005000323)
 10. Sinks Pharmacy (#2008006197)
 11. Sinks Pharmacy (#2013013020)
 12. Sinks Pharmacy (#2013025859)
 13. Sinks Pharmacy (#2017044406)
 14. Sinks Pharmacy (#2018001550)
 15. Steelville Drug
 16. Towne Pharmacy
- h. Future Board Meeting Dates/Topics

DISCUSSION: Kimberly Grinston reported on the following rules:

- The Board has filed the technician supervision rules and is waiting on approval from the Governor’s Office.
- The intern pharmacist and preceptor site rules have been filed and approved by the Governor’s Office.
- Rule The nicotine replacement rule must be promulgated with the Board of Healing Arts. The Board of Healing Arts approved the rule but is now requesting to change the rule title to “Pharmacist Prescribing of Nicotine Replacement Therapy Products” or “Pharmacists Prescribing under Section 338.665.” Board consensus to change the rule title to Pharmacist Prescribing under Section 338.665.

Board discussion held on the presented medication destruction applications; **A motion was made by James Gray, seconded by Christina Lindsay, to approve the medication destruction applications. Motion passed 6:0:0:0 by roll call vote as follows:**

Colby Grove – Yes	James Gray- Yes	Christian Tadrus- Yes
Pamela Marshall – Yes	Anita Parran – Yes	Christina Lindsay- Yes

#18- Chief Inspector Update

DISCUSSION: Tom Glenski provided an update on future webinars and reported the Board is hosting a Regulatory Update in February and BNDD webinar in March. Mr. Glenski also noted that Scott Spencer and Katie DeBold attended Critical Pointe sterile compounding training.

MOTION FOR CLOSED SESSION (11:02 A.M.)

At 11:02 a.m., a motion was made by Christian Tadrus, seconded by James Gray, that the Board go into closed session and that all votes, to the extent permitted by law, pertaining to and/or resulting from this closed meeting be closed under Section 610.021(1) and (14), RSMo. Motion passed 6:0:0:0 by roll call vote as follows:

Colby Grove – Yes
Pamela Marshall – Yes

James Gray- Yes
Anita Parran – Yes

Christian Tadrus- Yes
Christina Lindsay- Yes

The public left the meeting room

RETURN TO OPEN

By motion duly made and recorded in the closed session minutes, the Board returned to open session at 3:02 p.m.

#12- Missouri Bd. of Pharmacy v. Andrew Mehrle

- Notice of Disciplinary Hearing

Andrew Mehrle entered the room at 3:16. The Hearing Script was read. Mr. Mehrle was not represented by counsel. Mehrle did not have an opening statement. Alicia Embly-Turner presented the evidence. The meeting concluded at 3:40 p.m. A hearing transcript is available at the Board's office.

#20- Missouri Bd. of Pharmacy v. Andrew Palans

- Notice of Disciplinary Hearing

Andrew Palans entered the room at 3:42 p.m. The Hearing Script was read. Mr. Palans was represented by counsel, Randall Grady. Opening statements were provided and evidence admitted. The meeting concluded at 4:10p.m. A hearing transcript is available at the Board's office.

#19- Missouri Bd. of Pharmacy v. James Brittain

- Notice of Disciplinary Hearing

James Brittain was not present and was not represented by counsel. Alicia Embly-Turner provided an opening statement and presented evidence. The hearing concluded at 4:17 p.m. A hearing transcript is available at the Board's office.

#10- Hospital Advisory Committee Update

DISCUSSION: Kimberly Grinston noted the Missouri Society of Health-System Pharmacists is also having a meeting today; therefore Hospital Advisory Committee

members were unable to attend the Board meeting. Ms. Grinston reported President Teale provided the following written updates:

- The committee has worked with Tom Glenski and Kimberly Grinston on updating the Class B guideline document regarding medication distribution.
- MSHP has taken the lead on developing guidelines for hospitals using a technician-check-technician program.
- MHA is working with BNDD regarding language around pharmacies dispensing controlled substances to physician clinics.
- The committee discussed opportunities for health systems to continue to file for Rx Cares funding.

President Lang noted the tech-check-tech guidelines are in the agenda today for final vote.

#21- Pharmacist Code of Ethics

- APhA Code of Ethics
- Royal Pharmaceutical Society of Great Britain
- IACP Code of Ethics
- Malta Code of Ethics

Christian Tadrus asked to explore adopting or recommending a pharmacist code of ethics as part of the Board's Strategic focus goals. Board consensus to discuss further with legal counsel.

MOTION FOR CLOSED SESSION (4:19. P.M.)

At 4:19 p.m., a motion was made by James Gray, seconded by Christina Lindsay, that the Board go into closed session and that all votes, to the extent permitted by law, pertaining to and/or resulting from this closed meeting be closed under Section 610.021(1) and (14), and 324.001.8 and .9. RSMo. Motion passed 6:0:0:0 by roll call vote as follows:

Colby Grove – Yes

James Gray- Yes

Christian Tadrus- Yes

Pamela Marshall – Yes

Anita Parran – Yes

Christina Lindsay- Yes

The public left the meeting room.

January 8, 2020 (Wednesday)

The Board reconvened in closed session at 8:22 a.m. on Wednesday January 8, 2020.

RETURN TO OPEN

By motion duly made, seconded, passed and recorded in closed session minutes, the Board reconvened in open session at approximately 1:49 p.m. on January 8, 2020.

MOTION TO ADJOURN (1:49 P.M.)

A motion was made by Pamela Marshall, seconded by Christina Lindsay, to adjourn the January 2020 meeting. Motion passed 6:0:0:0 by roll call vote as follows:

**Colby Grove – Yes
Pamela Marshall – Yes**

**James Gray- Yes
Anita Parran – Yes**

**Christina Lindsay- Yes
Christian Tadrus- Yes**

The meeting was adjourned.

**KIMBERLY GRINSTON
EXECUTIVE DIRECTOR**

OPEN SESSION MINUTES

Missouri Board of Pharmacy CONFERENCE CALL

Missouri Division of Professional Registration
3605 Missouri Boulevard
Jefferson City, MO 65109

February 19, 2020
3:00 p.m.

The Missouri Board of Pharmacy met in open session via conference call during the times and dates stated in the following minutes. Each item in the minutes is listed in the order discussed.

Board Members Present

Douglas R. Lang, R.Ph., President
James Gray, PharmD., Vice-President
Colby Grove, PharmD., Member
Christina Lindsay, PharmD., Member
Pamela Marshall, R.Ph., Member
Christian Tadrus, PharmD., Member
Anita Parran, Public Member

Staff Present

Kimberly Grinston, Executive Director
Jennifer Boehm, Administrative Coordinator
Bennie Dean, R.Ph, Inspector
Sarah Decker, Compliance Coordinator
Tom Glenski, R.Ph, Chief Inspector
Andi Miller, PharmD., Inspector
Scott Spencer, R.Ph, Inspector
Daniel Vandersand, R.Ph, Inspector
Elaina Wolzak, R.Ph, Inspector

Others Present

Daryl Hylton, Legal Counsel

President Douglas Lang called the meeting to order at approximately 3:02 p.m. on February 19, 2020 and roll call was taken.

#3. Approval of Minutes

- a. August 9, 2019
- b. August 21, 2019
- c. September 18, 2019
- d. October 15-16, 2019
- e. November 13, 2019
- f. December 4, 2019
- g. December 11, 2019

DISCUSSION:

A motion was made by Anita Parran, seconded by Pamela Marshall, to approve the August 9, 2019 open session minutes. Motion passed 4:0:2:0 by roll call vote as follows:

Colby Grove – Abstain	James Gray- Yes	Christina Lindsay- Abstain
Pamela Marshall – Yes	Anita Parran – Yes	Christian Tadrus- Yes

A motion was made by Pamela Marshall, seconded by Anita Parran, to approve the August 21-22, 2019 open session minutes. Motion passed 6:0:0:0 by roll call vote as follows:

Colby Grove – Yes	James Gray- Yes	Christina Lindsay- Yes
Pamela Marshall – Yes	Anita Parran – Yes	Christian Tadrus- Yes

A motion was made by Pamela Marshall, seconded by Christina Lindsay, to approve the September 18, 2019 open session minutes. Motion passed 6:0:0:0 by roll call vote as follows:

Colby Grove – Yes	James Gray- Yes	Christina Lindsay- Yes
Pamela Marshall – Yes	Anita Parran – Yes	Christian Tadrus- Yes

A motion was made by James Gray, seconded by Anita Parran, to approve the October 15-16, 2019 open session minutes. Douglas Lang asked to correct the minutes to reflect the June conference call was moved to June 17th. Board consensus to amend as suggested. Motion passed 6:0:0:0 by roll call vote as follows:

Colby Grove – Yes	James Gray- Yes	Christina Lindsay- Yes
Pamela Marshall – Yes	Anita Parran – Yes	Christian Tadrus- Yes

A motion was made by Christian Tadrus, seconded by Pamela Marshall, to approve the November 13, 2019 open session minutes. Motion passed 6:0:0:0 by roll call vote as follows:

Colby Grove – Yes	James Gray- Yes	Christina Lindsay- Yes
Pamela Marshall – Yes	Anita Parran – Yes	Christian Tadrus- Yes

A motion was made by Christian Tadrus, seconded by Anita Parran, to approve the December 4, 2019 open session minutes. Motion passed 5:0:1:0 by roll call vote as follows:

Colby Grove – Yes	James Gray- Yes	Christina Lindsay- Abstain
Pamela Marshall – Yes	Anita Parran – Yes	Christian Tadrus- Yes

A motion was made by Pamela Marshall, seconded by Christian Tadrus, to approve the December 11, 2019 open session minutes. Motion passed 6:0:0:0 by roll call vote as follows:

Colby Grove – Yes	James Gray- Yes	Christina Lindsay- Yes
Pamela Marshall – Yes	Anita Parran – Yes	Christian Tadrus- Yes

#4. 2020 Legislative Update
a. Bill Tracking Sheet

DISCUSSION: Kimberly Grinston presented the bill tracking sheet.

- Kimberly Grinston noted staff continues to watch the reciprocity bill as it relates to military spouses and may remove the MPJE testing requirement.

- Ms. Grinston commented staff has received several questions on SB976 (intern remote dispensing) and is monitoring the bill closely.
- Christian Tadrus asked about SB 689 and the prohibition on using licensing fees for continuing education. Mr. Tadrus noted the bill would have a large impact on the Lunch with the Chief webinars, and asked if the Board should be engaged on the bill. Ms. Grinston replied the Board had permission from the Governor last year to take a position on the bill and noted the Board has had fewer compliance concerns and attributed that to the CE programs. Ms. Grinston noted staff proposed language to be able to provide CE if it is free; however, that language was rejected. Kimberly Grinston further noted she has reached out to the Missouri Pharmacy Association (MPA) to voice concerns.
- Christian Tadrus asked if SB928 would allow dispensing for office use. Douglas Lang noted the bill would fix the Bureau of Narcotics and Dangerous Drugs (BNDD) issue, and would allow delivery of a controlled substance to the physician's office. Mr. Lang suggested the Board support the bill; Mr. Tadrus agreed.
- Daryl Hylton noted SB976 provides remote dispensing systems cannot be within ten miles of an existing pharmacy and questioned if the bill should limit placement "within ten miles of the nearest existing pharmacy." Mr. Hylton further noted the requirement of 5,000 people would include multiple cities. Douglas Lang stated some St. Louis patients have problems with access to pharmacies even though pharmacies are technically nearby. President Lang further noted he does not agree with the mileage and patient population restrictions being in statute.
- Christian Tadrus stated it is hard to define what constitutes an underserved area and suggested consideration should be given to a host of factors, not just mileage and population. Mr. Tadrus noted SB976 gives a pharmacy intern independent managing responsibilities which may be the preferable approach for Missouri given that intern pharmacists have more training than a technician. Mr. Tadrus suggested patients would be better protected if intern pharmacists were able to expand duties as opposed to just pharmacy technicians. Douglas Lang suggested the Board talk with legal counsel on SB976.
- Regarding the contraceptive bill, Douglas Lang questioned if Missouri should follow other states and officially recognize pharmacist prescriptive authority. Kimberly Grinston replied the pharmacy associations will be pushing for full prescriptive authority language in both the contraception and HIV PrEP and PEP bills.
- Tom Glenski noted the contraceptive bill is limiting because it requires a Medication Therapeutic Services (MTS) certificate which means a prescription would be required for each patient which will likely significantly limit the pharmacists who would qualify or use the allowance. Board consensus to relay comments that the preferred language would be to recognize pharmacists' authority to prescribe as with other states, and to not require a MTS certificate for contraceptives given licensees have expressed concerns with complexity.
- Board consensus to send similar language as the contraceptive bill on HB2394. Board consensus to oppose HB 1440 (importation) and HB1442. Further consensus to support HB 2337 since it was part of the Board's legislative package.

#5. Return-To-Stock Medication/Revision of 20 CSR 2220-3.040

- a. Discussion rule draft

DISCUSSION: Kimberly Grinston provided revised draft rule language.

- Board discussion held. James Gray questioned if pharmacies could commingle lot numbers. Tom Glenski replied pharmacies currently commingle lot numbers when filling cells and noted

the draft rule language would allow the pharmacy to pour medication back into the cell without a requirement to track the lot numbers. Glenski further noted the repackaging rule would still require the lot number on the label for items that are repackaged. James Gray further stated it is impractical to track lot numbers unless the cell is completely empty and questioned if additional clarification language was needed. Tom Glenski suggested issuing guidance in the Practice Guide.

- Christian Tadrus commented the proposed language is commiserate with what is happening in practice and suggested the draft provides sufficient parameters while not being burdensome.

A motion was made by Pamela Marshall, seconded by James Gray, to approve 20 CSR 2220-3.040 for filing. Motion passed 5:0:0:1 by roll call vote as follows:

Colby Grove – Yes	James Gray- Yes	Christina Lindsay- Absent
Pamela Marshall – Yes	Anita Parran – Yes	Christian Tadrus- Yes

#6. Approval of Special Sites/Non-Pharmacist Preceptors

- a. Harry S. Truman Memorial Veterans Hospital (Renewal)
- b. Missouri Poison Center (Renewal)
- c. UMKC School of Pharmacy- Division of Pharmacy Practice and Administration (Renewal)
- d. United States Medical Center for Federal Prisoners (New)
- e. Veteran Affairs Medical Center- John Cochran (Renewal)
- f. U.S. Food and Drug Administration- Division of Drug Information (New)
- g. Walgreens Area Office (Renewal)
- h. Senofi Genzyme

DISCUSSION: Douglas Lang noted the U.S. Medical Center for Federal Prisoners site is not in the agenda and does not need to be approved. Tom Glenski recommended approval of the special sites/non-pharmacist preceptors listed; additional information on the Walgreens Area Office site was e-mailed to Board members prior to the meeting. **A motion was made by Christian Tadrus, seconded by Pamela Marshall, to approve the special sites/non-pharmacist preceptors listed for five-hundred (500) hours with the exception of United States Medical Center for Federal Prisoners. Motion passed 5:0:0:1 by roll call vote as follows:**

Colby Grove – Yes	James Gray- Yes	Christina Lindsay- Absent
Pamela Marshall – Yes	Anita Parran – Yes	Christian Tadrus- Yes

#7. Executive Director Office Updates

DISCUSSION: Kimberly Grinston asked if the Board would like to lower pharmacist and intern renewal fees for 2020 based on fiscal projections provided by the Division’s budget office. Ms. Grinston indicated future purchase of the licensing system may impact Board funds within the next 18-24 months but exact costs are unknown. Douglas Lang suggested a \$125 renewal fee for pharmacists given the potential unknown licensure system costs. Pamela Marshall suggested a \$100 reduction may be appropriate for pharmacists given the current pharmacist job market in Missouri. Christian Tadrus asked if the Board can increase the Rx Cares for Missouri appropriation; Kimberly Grinston stated the Board could request additional appropriation authority in 2021. Additional Board discussion held; **A motion was made by Pamela Marshall, seconded by James Gray, to reduce the pharmacist renewal fee to \$ 100 and the intern pharmacist renewal fee to \$ 40 for the 2020 renewal period. Motion passed 5:1:0:0 by roll call vote as follows:**

**Colby Grove – Yes
Pamela Marshall – Yes**

**James Gray- Yes
Anita Parran – Yes**

**Christina Lindsay- No
Christian Tadrus- Yes**

Douglas Lang asked Board members to send strategic planning items to the Executive Director to prepare for the April meeting.

#8. Pilot Project Sub-Committee

DISCUSSION: James Gray noted the committee is still reviewing pending applications and will meet on Friday. The subcommittee met with 1 applicant for additional information and learned the applicant sent the wrong proposal to the Board. The subcommittee anticipates having a recommendation in the future.

MOTION FOR CLOSED SESSION (4:12 P.M.)

A motion was made by Christian Tadrus, seconded by Pamela Marshall, that the Board go into closed session and that all votes, to the extent permitted by law, pertaining to and/or resulting from the closed meeting be closed under Section 610.021(1) and (14), RSMo and 324.001.8 and 324.001.9, RSMo. Motion passed 6:0:0:0 by roll call vote as follows:

**Colby Grove – Yes
Pamela Marshall – Yes**

**James Gray- Yes
Anita Parran – Yes**

**Christina Lindsay- Yes
Christian Tadrus- Yes**

RETURN TO OPEN SESSION

By motion duly made and recorded in the closed session open session minutes, the Board returned to open session at approximately 6:59 p.m.

MOTION TO ADJOURN (6:59 P.M.)

A motion was made by Christian Tadrus, seconded by Colby Grove, to adjourn the February 19, 2020 conference call. Motion passed 6:0:0:0 by roll call vote as follows:

**Colby Grove – Yes
Pamela Marshall – Yes**

**James Gray- Yes
Anita Parran – Yes**

**Christina Lindsay- Yes
Christian Tadrus- Yes**

THE MEETING WAS ADJOURNED.

KIMBERLY GRINSTON
EXECUTIVE DIRECTOR

#4. COVID-19/Emergency Response Updates

- a. Office Updates
- b. Licensing Updates
- c. Inspector Updates
- d. Board waivers
- e. Medication Dispensing
- f. Additional statutory/rule waivers

- #5. Drug Utilization Review/Revision of 20 CSR 2220-2.195
 - b. Discussion rule draft

*****FOR DISCUSSION PURPOSES ONLY*****

20 CSR 2220-2.195 Prospective Drug Utilization Review

PURPOSE: This rule establishes requirements for prospective drug utilization review prior to dispensing a prescription or medication order.

(1) Prospective Drug Review.

(A) Prior to dispensing, pharmacists shall use their professional judgment to review the patient's record for therapeutic appropriateness. The required prospective drug review shall include, but is not limited to, a review of:

1. Drug over-utilization or under-utilization;
2. Therapeutic duplication;
3. Drug-disease contraindications;
4. Drug-drug interactions;
5. Food, nutritional supplement or over-the-counter medication interactions;
6. Inappropriate drug dosage or treatment duration;
7. Drug-allergy interactions;
8. Clinical abuse/misuse; and
9. Any other factor deemed necessary or appropriate within the pharmacist's professional judgment to assess the adequacy of patient care/medication therapy.

(B) Upon identifying any of the above, the pharmacist shall take appropriate steps within their professional judgment to address or resolve the issues identified. Prospective drug review may only be performed by a pharmacist or an intern pharmacist working under the supervision of a Missouri licensed pharmacist.

- #6. Approval of Special Sites/Non-Pharmacist Preceptors
- a. Covance Inc (New)
 - b. East Coast Institute for Research (Renewal)
 - c. Goa College of Pharmacy (Renewal)
 - d. Jewell Osco-Albertson's Safeway District Office (Renewal)
 - e. Komfo Anyoke Teaching Hospital (Renewal)

- #7. Executive Director Office Updates
- a. Rule status report
 - b. Licensing/Renewal updates
 - c. NABP Update
 - d. Draft FY19 Annual report
 - e. 2020 Legislative Update
 - f. Draft Practice Guide Exam Revisions

- #8. Future Meeting Dates/Times
 - a. May/June 2020 Meeting
 - b. Strategic Planning

#9. Final Orders of Rulemaking

a. 20 CSR 2220-2.710 (Pharmacy Technician and Intern Supervision)

- i. MHA Comment
- ii. Draft Final Order
- iii. Filed Rule

b. 20 CSR 2220-2.725 (Remote Data Entry)

- i. GLO & Associates Comment
- ii. Draft Final Order
- iii. Filed Rule

Title 20—DEPARTMENT OF COMMERCE AND INSURANCE
Division 2095—Committee for Professional Counselors
Chapter 3—Professional Responsibility

PROPOSED AMENDMENT

20 CSR 2095-3.015 Client Welfare. The committee is amending sections (1) and (7).

PURPOSE: This rule is being amended to address the need for a client or patient to understand the parameters of distance based counseling.

(1) Before beginning a therapeutic relationship, a counselor shall explain and document the following elements of informed consent:

(G) Limits to confidentiality regarding individual, couple, family, and group therapy; *[and]*

(H) If utilized, taping or recording of sessions, and how the tapes will be used and stored.; *and*

(I) When using technology in the course of providing professional counseling, how such technology is in compliance with federal and state legal and ethical requirements.

(7) A counselor providing therapeutic services to a client shall maintain records that include the following:

(A) Informed consent as defined in *[subsections (1)(A)–(H)]* **section (1)**;

AUTHORITY: section[s] 337.520, *RSMo Supp. 2019*, and section 337.525, *RSMo [2000] 2016*. This rule originally filed as 4 CSR 95-3.015. Original rule filed Dec. 1, 2004, effective June 30, 2005. Moved to 20 CSR 2095-3.015, effective Aug. 28, 2006. Amended: Filed Feb. 14, 2020.

PUBLIC COST: This proposed amendment will not cost state agencies or political subdivisions more than five hundred dollars (\$500) in the aggregate.

PRIVATE COST: This proposed amendment will not cost private entities more than five hundred dollars (\$500) in the aggregate.

NOTICE TO SUBMIT COMMENTS: Anyone may file a statement in support of or in opposition to this proposed amendment with the Committee for Professional Counselors, PO Box 1335, 3605 Missouri Boulevard, Jefferson City, MO 65102-1335, by facsimile at (573) 751-0018, or via email at profcounselor@pr.mo.gov. To be considered, comments must be received within thirty (30) days after publication of this rule in the *Missouri Register*. No public hearing is scheduled.

Title 20—DEPARTMENT OF COMMERCE AND INSURANCE
Division 2220—State Board of Pharmacy
Chapter 2—General Rules

PROPOSED RULE

20 CSR 2220-2.710 Pharmacy Technician and Intern Pharmacist Supervision

PURPOSE: This rule defines the required supervision for pharmacy technicians and intern pharmacists.

(1) Pharmacy technicians and intern pharmacists may assist a pharmacist in the practice of pharmacy as authorized by Chapter 338, RSMo, and the rules of the board, provided delegated tasks are per-

formed under the direct supervision of a pharmacist. Direct supervision means supervision by a Missouri licensed pharmacist who is readily and immediately available at all times the delegated tasks are being performed and who provides personal assistance, direction, and approval throughout the time the delegated tasks are being performed. “Readily and immediately available” means the pharmacist and pharmacy technician(s) or intern pharmacists are on the same physical premises, or if not, technology is used to communicate with and observe the pharmacy technician and intern pharmacist, as authorized in section (2).

(2) Use of Technology. Except as otherwise provided by law or regulation, technology may be used to directly supervise a pharmacy technician and intern pharmacist, provided:

(A) Sufficient technology is available to allow communication between the pharmacist and the pharmacy technician or intern pharmacist in a manner that is sufficient to provide the personal assistance, direction, and approval required to verify and ensure delegated tasks are safely and properly performed. Technicians and intern pharmacists may not be supervised as authorized by this subsection if the required technology is not operating or available;

(B) All applicable state and federal laws are fully observed, including, but not limited to, all applicable privacy and confidentiality laws;

(C) The pharmacy technician or intern pharmacist has completed employer approved training in the activities performed and has an initial and annual documented assessment of competency. Documentation of the completed training and competency assessment must be maintained in the pharmacy’s records for a minimum of two (2) years and provided to the board or the board’s designee upon request; and

(D) The supervising pharmacist and the permit holder must maintain a sufficient audit trail of prescription/medication order data entry and modifications to a patient record performed by a pharmacy technician or intern pharmacist being supervised as authorized by this subsection. The record must include the identity of the pharmacy technician or intern pharmacist performing the data entry or modification and must be maintained in the pharmacy’s records for a minimum of five (5) years.

(3) The supervising pharmacist and permit holder shall retain responsibility for activities delegated to a pharmacy technician or intern pharmacist.

(4) Nothing in this rule shall override the provisions of 20 CSR 2220-2.010.

AUTHORITY: sections 338.010 and 338.140, *RSMo Supp. 2019*, and sections 338.013, 338.035, and 338.280, *RSMo 2016*. Original rule filed Feb. 7, 2020.

PUBLIC COST: This proposed rule will not cost state agencies or political subdivisions more than five hundred dollars (\$500) in the aggregate.

PRIVATE COST: This proposed rule will not cost private entities more than five hundred dollars (\$500) in the aggregate.

NOTICE TO SUBMIT COMMENTS: Anyone may file a statement in support of or in opposition to this proposed rule with the Missouri Board of Pharmacy, PO Box 625, 3605 Missouri Boulevard, Jefferson City, MO 65102, by facsimile at (573) 526-3464, or via email at pharmacy@pr.mo.gov. To be considered, comments must be received within thirty (30) days after publication of this rule in the *Missouri Register*. No public hearing is scheduled.



Herb B. Kuhn
President and CEO
P.O. Box 60
Jefferson City, MO 65102

April 10, 2020

Kimberly Grinston, J.D.
Executive Director
Missouri Board of Pharmacy
Missouri Department of Commerce & Insurance
P.O. Box 625
Jefferson City, MO 65102

Dear Ms. Grinston:

The Missouri Hospital Association appreciates the opportunity to provide comment on proposed 20 CSR 2220-2.710 - Pharmacy Technician and Intern Pharmacist Supervision Pharmacy. MHA is concerned about the impact of the rule in hospital pharmacies and strongly encourages the board to clarify the scope of its application. Specifically, MHA is concerned that the proposed rule limits the technician's scope of practice and ability to function in a hospital pharmacy. During the February 26 Hospital Advisory Committee meeting, you stated legal counsel had advised that the regulation only would pertain to areas under the jurisdiction of the Board of Pharmacy and since hospital pharmacies are under the jurisdiction of the Department of Health and Senior Services, it would not apply to hospitals. It also was explained the language was not intended to define the scope of practice of a pharmacy technician in a hospital setting.

Under the proposed definition of direct supervision, the pharmacist must be on the "same physical premises" as the technician or available through compliant technology. It is unclear whether the phrase "same physical premises" means the pharmacist and technician must be co-located such that they are able to communicate face-to-face. If so, this would eliminate the ability of the technician to carry out appropriate tasks while the pharmacist is in the hospital, but away from the pharmacy. Hospital pharmacists must spend time away from the pharmacy to counsel patients in inpatient units, meet with physicians, make patient rounds and attend various committee meetings. Because the rule addresses the activities of pharmacists and technicians, MHA is concerned it would apply to all supervising pharmacists and technicians subject to the professional licensure authority of the board.

As noted, the board has expressed its stance that the proposed rule only would apply to areas under the board's jurisdiction and that it is not intended to restrict the capacities of pharmacy technicians in hospital pharmacies under the jurisdiction of the Department of Health and Senior Services. To resolve any questions of intent or interpretation, MHA requests the board revise the proposed rule to explicitly clarify that it will not apply to the supervision of pharmacy technicians operating in a hospital pharmacy.

If you have any questions, you may contact me at 573-893-3700, ext. 1304 or swillson@mhanet.com.

Sincerely,

A handwritten signature in black ink that reads "Sarah Willson". The signature is written in a cursive, flowing style.

Sarah Willson
Vice President of Clinical and Regulatory Affairs

sw/pt



April 7, 2020

Missouri Board of Pharmacy
PO Box 625
3605 Missouri Boulevard
Jefferson City, MO 65102

or via email at pharmacy@pr.mo.gov

Re: **20 CSR 2220-2.725 Remote Data Entry**

Dear Sir or Madam:

Thank you for the opportunity for G.L.O. and Associates to comment on proposed rule **20 CSR 2220-2.725 Remote Data Entry**.

We generally support the proposed rule. However, with respect to the minimum standards of a pharmacy technician, our suggestion is to require technicians to be Certified Pharmacy Technicians (CPhT) in addition to the other requirements listed in (3)(C) in order to perform the functions outlined in this rule.

Thank you for the opportunity to provide comments in order to advance our profession while maintaining patient safety.

Sincerely,

George L. Oestreich, PharmD, MPA

Principal

**Title 20—DEPARTMENT OF COMMERCE AND
INSURANCE
Division 2220—State Board of Pharmacy
Chapter 2—General Rules**

PROPOSED RULE

20 CSR 2220-2.725 Remote Data Entry

PURPOSE: This rule authorizes and establishes requirements for remote data entry sites.

(1) Definitions.

(A) “Remote Data Entry Sites”—A remote site located in Missouri that is operated by a Missouri licensed pharmacy and used by a pharmacy technician or intern pharmacist to electronically perform non-dispensing data entry functions, including, but not limited to, obtaining, entering, validating, or processing patient information or data.

(B) “Supervising Pharmacy”—A Missouri licensed pharmacy that is physically located in Missouri and responsible for operating a remote data entry site.

(2) Licensing.

(A) “Remote Data Entry Sites”—A permit is not required for a remote data entry site. The site shall be deemed part of and operating under the supervising pharmacy’s permit. The supervising pharmacy must maintain an address listing of all remote data entry sites in operation which must be made immediately available upon request of the board or the board’s authorized designee.

(3) Remote data entry sites must be safely operated in compliance with applicable state and federal law. The supervising pharmacy is responsible for all pharmacy operations at the remote data entry site. No medication or medical device may be located at or dispensed from a remote data entry site.

(A) Adequate security and supervision must be maintained at all times to prevent unauthorized access to the remote data entry site and equipment. Confidential records must be securely maintained to prevent unauthorized access to, and unauthorized storage/transfer of, confidential information. Any breach in the security of the remote data entry site equipment or confidential records must be documented and reported to the board in writing within seven (7) days of the breach. Paper patient or prescription records may not be generated, located, or maintained at a remote data entry site.

(B) Except as otherwise provided by state and federal requirements, the remote data entry site and the supervising pharmacy must share a common database or prescription record-keeping system that allows real-time, online access to relevant patient profile information by both the supervising pharmacy and the remote site. The identity of the pharmacy technician or intern pharmacist responsible for remotely entering, validating, or modifying data at a remote data entry site must be electronically documented/recorded in the pharmacy’s records and maintained for a minimum of five (5) years.

(C) Pharmacy technicians and intern pharmacists operating at a remote data entry site must be competent in the duties performed. At a minimum, technicians and intern pharmacists must have completed employer approved training in the activities performed remotely and must have an initial and, if applicable, annual documented assessment of competency. Documentation of the completed training and competency assessment must be maintained in the pharmacy’s records for a minimum of two (2) years and provided to the board or the board’s designee upon request;

(D) A sufficient mechanism must be in place to allow communication between the supervising pharmacist and pharmacy technician or intern pharmacist when needed. A pharmacist must be available to respond to technician/intern pharmacist questions at all times a remote data entry site is in operation and must provide the personal

assistance, direction, and approval required to verify and ensure delegated tasks are safely and properly performed. Non-dispensing data entry functions may not be performed by a pharmacy technician or intern pharmacist at a remote data entry site if the required real-time communication mechanism is not operating or available.

(E) Remote data entry sites may be inspected by the board as authorized by law. Notification by the inspector will be provided to the supervising pharmacy a minimum of seventy-two (72) hours ahead of the scheduled inspection. The supervising pharmacy permit holder must arrange for a designated representative to be present that is not a resident of the location under inspection.

(4) Policies and Procedures. The supervising pharmacy must establish written policies and procedures governing all aspects of operation of a remote data entry site that are reviewed annually by the pharmacist-in-charge. At a minimum, policies and procedures must include authorized technician and intern pharmacist activities, site security procedures and requirements, reporting security breaches, quality assurance review procedures, and staff education/training. The annual policy and procedure review date must be documented in the pharmacy’s records.

AUTHORITY: sections 338.010 and 338.140, RSMo Supp. 2019, and sections 338.013, 338.035, and 338.280, RSMo 2016. Original rule filed Feb. 7, 2020.

PUBLIC COST: This proposed rule will not cost state agencies or political subdivisions more than five hundred dollars (\$500) in the aggregate.

PRIVATE COST: This proposed rule will not cost private entities more than five hundred dollars (\$500) in the aggregate.

NOTICE TO SUBMIT COMMENTS: Anyone may file a statement in support of or in opposition to this proposed rule with the Missouri Board of Pharmacy, PO Box 625, 3605 Missouri Boulevard, Jefferson City, MO 65102, by facsimile at (573) 526-3464, or via email at pharmacy@pr.mo.gov. To be considered, comments must be received within thirty (30) days after publication of this rule in the Missouri Register. No public hearing is scheduled.

**Title 20—DEPARTMENT OF COMMERCE AND
INSURANCE
Division 2220—State Board of Pharmacy
Chapter 6—Pharmaceutical Care Standards**

PROPOSED AMENDMENT

20 CSR 2220-6.055 Non-Dispensing Activities. The board is amending sections (2), (4), and (6).

PURPOSE: This amendment establishes requirements for pharmacy technicians assisting pharmacists with non-dispensing activities authorized by the rule outside of a Missouri licensed pharmacy.

(2) Confidentiality. A pharmacist, **pharmacy technician, or intern pharmacist** performing non-dispensing activities pursuant to this rule shall comply with all applicable state and federal confidentiality laws and regulations *[and shall provide]*. *[s]*/Sufficient storage and security for confidential documents and electronic data processing hardware **must be provided by the pharmacy permit holder or the pharmacist**. In addition, data processing systems must utilize sufficient security software to ensure confidentiality and prevent unauthorized access. Any breach in the security or confidentiality of the data processing systems or confidential documents shall be documented and reported to the board in writing within seven (7) days of the breach.

(4) A pharmacist, **pharmacy technician, or intern pharmacist** performing non-dispensing activities pursuant to this rule shall ensure compliance with Chapter 338, RSMo, and the rules of the board at all times. Nothing in this rule shall be construed to eliminate or otherwise exempt any pharmacist, **pharmacy technician, intern pharmacist, or pharmacy permit holder** from the record-keeping, confidentiality, or security requirements otherwise imposed by Chapter 338, RSMo, or the rules of the board. Violations of this section shall constitute grounds for discipline.

[(6) A pharmacy permit shall be required for performing non-dispensing activities if the pharmacist is using a pharmacy technician to assist in the practice of pharmacy at the location where non-dispensing activities are being performed, provided that a pharmacy permit shall not be required for sites used solely by the pharmacist for administering vaccines as authorized by Chapter 338, RSMo, and the rules of the board. Pharmacy technicians shall only be authorized to work under the direct supervision of a pharmacist as provided by section 338.013, RSMo, and 20 CSR 2220-2.700.]

(6) A pharmacy technician and intern pharmacist may be used to assist a pharmacist with non-dispensing activities outside of a pharmacy subject to the following:

(A) The pharmacy technician/intern pharmacist must be under the direct supervision of a Missouri licensed pharmacist as required by 20 CSR 2220-2.710. The supervising pharmacist must ensure pharmacy technician/intern pharmacist activities comply with state and federal law and must provide the personal assistance, direction, and approval required to verify and ensure delegated non-dispensing activities are safely and properly performed;

(B) The pharmacy technician or intern pharmacist must have completed employer approved training in the activities performed and have an initial and, if applicable, annual documented assessment of proficiency. Documentation of the completed training and proficiency assessment must be maintained in the pharmacy's records for a minimum of two (2) years and provided to the board or the board's designee upon request;

(C) A sufficient mechanism must be in place to allow real-time communication between a pharmacist and the technician/intern pharmacist when needed. A pharmacist must be available to respond to pharmacy technician/intern pharmacist questions at all times non-dispensing activities are being performed; and

(D) Adequate security and supervision must be maintained at all times to prevent unauthorized access to, and unauthorized storage/transfer of, confidential patient information or patient records.

(E) The provisions of this section (6) do not apply to technicians or intern pharmacists engaged in delivering filled prescriptions/medication orders on behalf of the pharmacy as authorized by 20 CSR 2220-2.013.

AUTHORITY: sections 338.010 and [338.220] 338.140, RSMo Supp. [2009] 2019, and sections [338.140] 338.035 and 338.220, RSMo [2000] 2016. Emergency rule filed Oct. 23, 2009, effective Nov. 2, 2009, expired April 30, 2010. Original rule filed Oct. 22, 2009, effective June 30, 2010. Amended: Filed Feb. 7, 2020.

PUBLIC COST: This proposed amendment will not cost state agencies or political subdivisions more than five hundred dollars (\$500) in the aggregate.

PRIVATE COST: This proposed amendment will not cost private entities more than five hundred dollars (\$500) in the aggregate.

NOTICE TO SUBMIT COMMENTS: Anyone may file a statement in support of or in opposition to this proposed amendment with the

Missouri Board of Pharmacy, PO Box 625, 3605 Missouri Boulevard, Jefferson City, MO 65102, by facsimile at (573) 526-3464, or via email at pharmacy@pr.mo.gov. To be considered, comments must be received within thirty (30) days after publication of this rule in the Missouri Register. No public hearing is scheduled.