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West Virginia Board of Pharmacy Response to Comments on 15 CSR 1

The Board has agreed to accept the West Virginia Hospital Association's proposed change to include "scrubs" as acceptable attire for pharmacy technicians.

The Board appreciates the West Virginia Retailers Association's support of the proposed changes to 15 CSR 1.

Ryan L. Hatfield

General Counsel



100 Association Drive
Charleston, WV 25311-1571
Phone (304)344-9744
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August 19, 2020

Ryan Hatfield
2310 Kanawha Blvd., East
Charleston, WV 25311

Dear Mr. Hatfield-

Re: LEGISLATIVE RULE 15CSR1, LICENSURE AND PRACTICE OF PHARMACY

On behalf of the West Virginia Hospital Association and its 61 member hospitals and health systems, we respectfully submit this letter to provide public comments in support of the above referenced Legislative Rule 15CSR1, Licensure and Practice of Pharmacy.

This past May, the Board extended the opportunity to various stakeholders to provide input on its legislative rules. For your reference, we're providing our June 5th response to that request which comprises general feedback by our member hospitals and health systems. We look forward to working with you on these issues.

We're pleased that Legislative Rule 15CSR1, Licensure and Practice of Pharmacy incorporates many of the changes we requested, including:

- * Amending 11.1.1 to specifically exempt inpatient pharmacies from the provisions of the subdivision;
- * Adding "authorized generics" to subsection 10.1; and
- * Removing provisions of 6.2.2 relating to samples in inpatient areas.

We would additionally request that 14.1.4. be amended to permit a pharmacy technician working in an institutional licensed pharmacy to wear scrubs, in lieu of the "coat, jacket, or apron" requirement.

We appreciate the opportunity to submit comments in support of this legislative rule. We look forward to working with the Board of Pharmacy on this rule, and other issues, during the upcoming Legislative Session. If you have any questions or concerns, please contact me at (304) 353-9720.

Sincerely,

Brandon Hatfield
General Counsel



West Virginia Retailers Association

August 21, 2020

Mr. Ryan L. Hatfield
General Counsel
West Virginia Board of Pharmacy
2310 Kanawha Blvd., East
Charleston, WV 25311

via email: Ryan.L.Hatfield@wv.gov

RE: West Virginia Board of Pharmacy Rule 15-01

Dear Mr. Hatfield:

Members of West Virginia Retailers Association operate nearly 400 chain and independent pharmacies and employ over 16,000 individuals within the state of West Virginia.

The WV Board of Pharmacy's rule 15-01 regulating the licensure and practice of pharmacists' care is a positive step in the right direction for communities across the mountain state. Adding workflow efficiencies' behind the pharmacy counter provides patients with less wait time and more efficient service.

The current pandemic has shown just how vital pharmacies are in their service to local communities.

Best regards,

Bridget Lambert, President
WV Retailers Association

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Hatfield, Ryan L

From: Jill McCormack <JMcCormack@NACDS.org>
Sent: Tuesday, August 18, 2020 1:01 PM
To: Hatfield, Ryan L
Cc: Capehart, Krista D; Bridget Lambert - WV Retailers Association (blambert@wvretailers.com)
Subject: [External] NACDS support for Proposed Rules

CAUTION: External email. Do not click links or open attachments unless you verify sender.

Dear Mr. Hatfield:

NACDS is writing to note our support for proposed rules 15 WVCSR 1 that defines "electronic supervision" and 15 WVCSR 12 regarding immunizations. We applaud the Board for taking these steps to modernize patient care, especially during the current pandemic.

As you are well aware, business efficiencies like electronic supervision have allowed pharmacists to streamline workflow in and out of the pharmacy, ultimately resulting in the ability to serve more patients in a timely manner. Streamlining workflow also frees up pharmacists to offer critical services such as immunizations that are -- and will continue to be -- much needed as this health crisis continues. We also noted the addition of the State of Emergency language adding "FDA authorized or approved" vaccine to immunization rule. This is a critical provision that we strongly support. Thus, these rules dovetail nicely together and will help us serve the healthcare needs of West Virginia's patients as we move towards a flu season that will no doubt be complicated by the ongoing COVID-19 crisis.

Thank you for the opportunity to comment and please don't hesitate to contact me if you need more information or assistance.

Sincerely,
Jill

Jill McCormack | Regional Director, State Government Affairs
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