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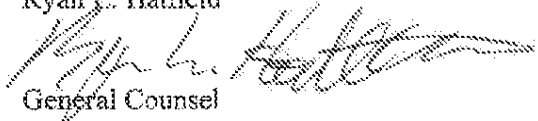
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**West Virginia Board of Pharmacy Response to Comments on 15 CSR 3**

The Board has rejected the West Virginia Hospital Association's comment on 15 CSR 3 because accepting the change proposal would require a statutory change.

Ryan L. Hatfield

  
General Counsel



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August 19, 2020

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

Dear Mr. Hatfield-

Re: LEGISLATIVE RULE 15CSR3, BOARD OF PHARMACY RULES FOR  
CONTINUING EDUCATION FOR LICENSURE OF PHARMACISTS

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 relating to the above referenced Legislative Rule 15CSR3, Board of Pharmacy Rules for Continuing Education for Licensure of Pharmacists.

We recommend amending subdivision 4.4.b., following the words "best practice prescribing of controlled substances training," by striking the word "and" and inserting the word "or". During our review process a concern was expressed that requiring a CPE course to meet all three requirements would significantly limit the number of courses available to satisfy this requirement.

We appreciate the opportunity to submit comments relating to 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