

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS

F I N A L M I N U T E S

MEETING OF:

STATE BOARD OF PHARMACY

TIME: 10:30 A.M.

Held at

PENNSYLVANIA DEPARTMENT OF STATE

2525 North 7th Street

CoPA HUB, Eaton Conference Room

Harrisburg, Pennsylvania 17110

as well as

VIA MICROSOFT TEAMS

February 24, 2026

State Board of Pharmacy
February 24, 2026

ALSO PRESENT: (cont.)

Susan DelMonico, R.Ph., JD, Associate General
Counsel, Deputy Pharmacy Compliance Officer, Genoa
Healthcare
Terry Talbott, R.Ph., Pharmacy Advocate and
Regulatory Consultant, Founder, PraeScriptum
Advisors
Geoffrey Christ, Senior Pharmacy Compliance Manager,
Chewy Pharmacy
Jacquelyn Sassaman, Pentec Health
Victoria Elliott, R.Ph., CEO, Pennsylvania
Pharmacists Association
Ashley Addison, Pharm.D, Executive Fellow,
Pennsylvania Pharmacists Association
Natalie Percival, Assistant Professor of Pharmacy
Practice, Nesbitt School of Pharmacy, Wilkes
University
Michelle Aytay, Manager, Pharmacy Affairs, Walgreens
Daniel Longyhore, Pharm.D., Ed.D., Geisinger Health
William Irvin, Director Regulatory Compliance, CVS
Caremark
Anthony Bixler, R.Ph., WellSpan York Hospital, Co-
Chair Legislative Affairs Committee, Pennsylvania
Society of Health-System Pharmacists
Jen Sullivan, Pharm.D., CPPS, Pharmacy Manager of
Quality, WellSpan York Hospital
Sean Young, Pharm.D., Main Line Health, Co-Chair
Legislative Affairs Committee, Pennsylvania Society
of Health-System Pharmacists
Katie Gruber, MSW, CADC, Billing Data and Training
Manager, Peer Assistance Monitoring Program
Maria Calle Lecaro, Assistant Case Manager,
Pennsylvania Medical Society
Jonathan Ference, Dean, Nesbitt School of Pharmacy,
Wilkes University
Julia Lazzaris, Student, Pennsylvania Pharmacists
Association
Bradley Dudeck, Pharm.D., Assistant Professor,
Geisinger College of Health Sciences
Kerry Maloney, Esquire, Senior Associate Counsel,
UMPC
Alexis Jackson, Pharm.D., MBA, Health and Wellness
Director, Walmart
Services, Weis Markets

State Board of Pharmacy
February 24, 2026

ALSO PRESENT: (cont.)

1
2
3
4
5
6
7 Brittany Venturella, Pharm.D., CSP, Manager of
8 Clinical Specialty and Central Fill Pharmacy
9 Jessica Leyva, Member Relations Coordinator, National
10 Association of Boards of Pharmacy
11 Jennifer Hall, Director of Pharmacy, CAPS Pharmacy
12 Dominic D'Orazio, Pharm.D., PGY1 Community-Based
13 Pharmacy Resident, Albertsons Companies
14 Charlotte Harris, Emerus
15 Caitlyn Curry, Amazon
16 Rony Foumia, Chair, Michigan Board of Pharmacy
17 Matthew Popowicz, Cardinal Health
18 Lisa Braccini-Barletta, MBA, R.Ph., Director of
19 Pharmacy, Penn State Milton S. Hershey Medical
20 Center
21 Jessica Clancy, Pharm.D., MS, Coordinator of
22 Professional Development and Training, Hospital of
23 the University of Pennsylvania
24 Cassandra Morey, Pharm.D., BCSCP, Pharmacy Clinical
25 Specialist, Regulatory Compliance, Guthrie
26 Nicole Fidler, Associate, Malady & Wooten Inc.
27 Mikala Conatser, Pharm.D., New Solutions Functional
28 Wellness Pharmacy, RD3MG
29 Amanda Abernathy, Pharmacy Technician Training
30 Coordinator, UPMC
31 Izabella Myra Pinto Vera, Pharmacy Intern, CVS
32 Pharmacy
33 Judy Kutchman, Manager Professional Practices,
34 AllianceRx Walgreens Pharmacy
35 Hiral Patel, Pharm.D., MHA, Senior Director of
36 Pharmacy, Temple Health
37 Zayne Kemler, Paralegal, Government Relations, Myers
38 Brier & Kelly LLP
39 Porscha Childs, Pharm.D., R.Ph., Pharmacovigilance
40 Patient Safety Specialist, Novo Nordisk
41 Ryan Lichtenberg, Pharmacy Compliance Specialist, The
42 Giant Company
43 Danielle DiCiolla, Manager Regulatory Affairs,
44 Cardinal Health
45 Sheetal Kamath, Pharmacist Specialist, UPMC
46 Isra Chaundhry, Pharmacy Intern, Thomas Jefferson
47 University Hospital
48 Donna Watson, Pharm.D., R.Ph., DICVP, FSVHP, Director
49 of Pharmacy Services, Ryan Veterinary Hospital,
50 University of Pennsylvania

State Board of Pharmacy
February 24, 2026

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51

ALSO PRESENT: (cont.)

- Ashly Marino, Pharm.D., Healthcare Supervisor,
Walgreens
- Becky Taylor, Pharm.D., Vice President Pharmacy
Service Line, UPMC
- Timothy Gates, Partner, Myers Brier & Kelly LLP
- Lauryn Milbourne, Pharmacy Student, University of
Pittsburgh
- Gerald McGrory, Director of Pharmacy Services,
Phoenixville Hospital
- Lucille Sherman, Associate, Myers Brier & Kelly LLP
- Misha Patel, Esquire, Government Relations
Specialist, Pennsylvania Medical Society
- Heather Wilson, Deputy Executive Vice President,
Pennsylvania Medical Society
- Carrie Phillips, Pharm.D., Executive Officer, Vermont
Board of Pharmacy
- Ed Foote, Pharm.D., FCCP, Dean, Philadelphia College
of Pharmacy, Saint Joseph's University
- Mayank Amin, Pharm.D., R.Ph., Owner, Skipjack
Pharmacy
- Dylan Mueller
- Erin Badstuebner, Sargent's Court Reporting Service,
Inc.

1 ***

2 State Board of Pharmacy

3 February 24, 2026

4 ***

5 The rescheduled meeting of the State Board of
6 Pharmacy was held on Friday, December 19, 2025.
7 Christine Roussel, Pharm.D., BCOP, BCSCP, Chairperson
8 called the meeting to order at 10:30 a.m.

9 ***

10 [Pursuant to Section 708(a)(5) of the Sunshine Act,
11 at 9:00 a.m., the Board entered into Executive
12 Session with Sean C. Barrett, Esquire, Board Counsel,
13 for the purpose of conducting quasi-judicial
14 deliberations and to receive the advice of Board
15 Counsel. The Board returned to open session at 10:34
16 a.m.]

17 ***

18 [Sean C. Barrett, Esquire, Board Counsel, noted the
19 the meeting was being recorded, and those who
20 continued to participate were giving their consent to
21 be recorded.

22 Mr. Barrett also noted the Board entered into
23 Executive Session for the purpose of conducting
24 quasi-judicial deliberations on a number of matters
25 that are currently pending before the Board and to

1 receive the advice of counsel.]

2 ***

3 Introduction of Board Members/Attendees

4 [Christine Roussel, Pharm.D., BCOP, BCSCP,

5 Chairperson, requested an introduction of Board

6 members and attendees. A quorum was present.]

7 ***

8 Approval of the Minutes

9 CHAIR ROUSSEL:

10 So first, let's start with the approval
11 of the minutes. Anyone feel the need
12 for any edits or discussions around the
13 minutes?

14 MR. ESTERBROOK:

15 Motion to approve minutes.

16 MS. HART:

17 Second, Hart.

18 CHAIR ROUSSEL:

19 Any further discussion?

20 MR. BARRETT:

21 Just to be clear for the record, those
22 are the minutes of the December 19,
23 2025 meeting.

24 CHAIR ROUSSEL:

25 Thank you so much, Counsel. I

1 appreciate that. Shall we call the
2 vote around approving the minutes for
3 the December 19th meeting?

4
5 Reed, aye; Hart, aye; Esterbrook, aye;
6 Claggett, aye; Slagle, aye; Pohlhaus,
7 abstain; Roussel, aye.

8 [The motion carried. Ms. Pohlhaus abstained from
9 voting on the matter.]

10 ***

11 Report of Board Prosecution

12 [Nathan C. Giunta, Esquire, Board Prosecution
13 Liaison, presented the Consent Agreements for Agenda
14 Item No. 5, Case No. 24-54-003415; Agenda Item No. 6,
15 Case No. 25-54-006760; and Agenda Item No. 7, Case
16 No. 25-54-008067.]

17 ***

18 [Ray J. Michalowski, Esquire, Senior Board Prosecutor
19 and Prosecution Liaison, presented the VRP Consent
20 Agreements for Agenda Item No. 8, Case No. 25-54-
21 017592; and Agenda Item No. 9, Case No. 26-54-
22 000899.]

23 ***

24 [Ray J. Michalowski, Esquire, Senior Board Prosecutor
25 and Prosecution Liaison, discussed an upcoming

1 meeting with a couple of Prosecution inspectors and
2 offered to pass along Board questions.

3 Chair Roussel noted the Board always likes to
4 pass along thanks to the inspectors for their hard
5 work. She stated, over the past couple of years, the
6 Board discussed updating the inspection forms. She
7 asked if a meeting could be set up following the
8 April 2026 Board meeting. In particular, she
9 mentioned some registrants who have nonresident
10 permits and perform sterile compounding struggle with
11 nonresident state boards accepting Pennsylvania's
12 inspection form. She stated the form does not show
13 the inspectors are inspecting to 797, 795, and USP
14 800 when the inspectors are doing the appropriate due
15 diligence.

16 Mr. Michalowski stated the inspection reports are
17 under the ambit of the Bureau of Enforcement and
18 Investigation (BEI). He noted a BEI representative
19 would need to participate in the discussion. He
20 added prosecution could give their opinions,
21 comments, and assistance anywhere they could.

22 Chair Roussel asked what the next step would be
23 and if Ms. Trimmer could email BEI to facilitate the
24 meeting.

25 Mr. Michalowski responded the email would make

1 sense and for her to copy both himself and Acting
2 Commissioner Claggett for coordination. He will
3 confirm the correct contact person.

4 Chair Roussel stated it would be wonderful if a
5 BEI representative could facilitate a discussion at
6 the next Board meeting in April. At a minimum, she
7 stated an update could be provided in April 2026.
8 She recently read the California compounding
9 regulations, and California has a pre-inspection form
10 for license holders to fill out prior to inspections
11 which helps guide their inspectors.

12 Mr. Michalowski mentioned there is also a
13 Department of Health (DOH) survey report that is used
14 by DOH to survey facilities which do not fall within
15 the Prosecution Division's inspection authority. He
16 added the survey form is also out-of-date and could
17 be updated.

18 Chair Roussel suggested the Board could also
19 tackle both forms, noting 2026 would be the year
20 things get done.

21 Mr. Michalowski offered to find a DOH contact to
22 also be invited to the meeting.]

23 ***

24 MR. BARRETT:

25 Based on the presentation of

1 Prosecution, does any member of the
2 Board wish to return to Executive
3 Session for further deliberations?
4 Okay, hearing none.

5 Based on Executive Session
6 deliberations, I believe the Board
7 Chair would entertain a motion to
8 approve the Consent Agreements at Item
9 No. 5, Case No. 4-54-003415; Item No.
10 6, Case No. 25-54-006760; Item No. 7,
11 Case No. 25-54-008067; Item No. 8, Case
12 No. 25-54-017592; and Item No. 9, Case
13 No. 26-54-000899.

14 MR. ESTERBROOK:

15 So moved, Esterbrook.

16 MS. HART:

17 Hart, second.

18 CHAIR ROUSSEL:

19 Any discussion? Let's call the vote.

20
21 Reed, aye; Hart, aye; Esterbrook, aye;
22 Claggett, aye; Slagle, aye; Pohlhaus,
23 aye; Roussel, aye.

24 [The motion carried unanimously. The Respondent are
25 as follows: Agenda Item No. 5, Case No. 24-54-003415,

1 Procure Pharmaceutical Services; Agenda Item No. 6,
2 Case No. 25-54-006760, CVS Pharmacy 1600; and Agenda
3 Item No. 7, Case No. 25-54-008067, Daniel J Shearer,
4 RPh.]

5 ***

6 Report of Board Counsel - Proposed Adjudications and
7 Orders

8 MR. BARRETT:

9 Based on Executive Session
10 deliberations, I believe the Board
11 Chair would entertain a motion to adopt
12 the Proposed Adjudication and Order at
13 Item No. 10, New Solutions Functional
14 Wellness Pharmacy, Case No. 25-54-
15 006656.

16 MR. ESTERBROOK:

17 So moved, Esterbrook.

18 MS. HART:

19 Hart, second.

20 CHAIR ROUSSEL:

21 Any discussion? Okay, let's call the
22 vote.

23
24 Reed, aye; Hart, aye; Esterbrook, aye;
25 Claggett, aye; Slagle, aye; Pohlhaus,

1 aye; Roussel, aye.

2 [The motion carried unanimously.]

3 ***

4 Report of Board Counsel - Final Adjudications and
5 Orders

6 MR. BARRETT:

7 Based on Executive Session
8 deliberations, I believe the Board
9 Chair would entertain a motion to
10 approve the Final Adjudications and
11 Orders at Item No. 11, Shane
12 Christopher Wenner, R.Ph., Case No. 25-
13 54-011886; and Item No. 12, Robert
14 Kisiel, R.Ph., Case No. 25-54-015852.

15 MR. ESTERBROOK:

16 So moved, Esterbrook.

17 MS. HART:

18 Hart, second.

19 CHAIR ROUSSEL:

20 Any discussion on those expertly
21 drafted documents? All right, let's
22 call the vote.

23

24 Reed, aye; Hart, aye; Esterbrook, aye;
25 Claggett, aye; Slagle, aye; Pohlhaus,

1 aye; Roussel, aye.

2 [The motion carried unanimously.]

3 ***

4 Report of Board Chairperson

5 [Christine Roussel, Pharm.D., BCOP, BCSCP,

6 Chairperson, reported the Drug Enforcement Agency

7 (DEA) published a document on February 5, 2026

8 regarding emergency medical services (EMS) and

9 ensuring EMS providers have the medications needed

10 while on service calls. She recommended everyone

11 read the DEA document.]

12 ***

13 Report of Acting Commissioner - No Report

14 ***

15 Report of Executive Secretary

16 [Sara Trimmer, Pharm.D., R.Ph., Executive Secretary,

17 reported as of February 19, 2026, a total of 5,271

18 registrations had been issued for pharmacy

19 technicians and technicians trained.

20 Ms. Trimmer offered advice to make the

21 registration process smoother. She stated with the

22 registration is a Verification of Training or a

23 Verification of Practice form. If the employer is

24 unable to upload the form directly to the

25 application, the form is submitted via email. Ms.

1 Trimmer emphasized the form must be submitted by the
2 employer and not the applicant. She stated for ease
3 of uploading, putting the application reference ID
4 and the applicant's name in either the body, document
5 name or email subject line would be helpful. In
6 addition, if the applicant receives a discrepancy,
7 the email should have an annotation stating there is
8 a correction. She added she is receiving hundreds of
9 emails a day and the office is trying to be as
10 responsive and expeditious as possible, so any little
11 thing that can help will speed up the process.

12 Ms. Trimmer stated child abuse CE comes
13 electronically from the providers, so applicants need
14 to enter their social security number in the
15 application. Without the SSN, the CE cannot be
16 electronically matched with the application. She
17 also noted, if the employer is sending in a form or
18 information via email, copying the applicant on the
19 email allows the applicant to know the Board has
20 received the information.

21 Chair Roussel acknowledged there is a team working
22 behind Ms. Trimmer to process the applications. She
23 added Acting Commissioner Claggett had made sure
24 there were resources on the back end to process the
25 applications. She noted Ms. Trimmer was the one

1 reading all of the emails and communications to
2 triage as information came through. She added, while
3 there is a full commitment from the Board and BPOA to
4 move the applications through, it is incumbent on the
5 people submitting the documents to ensure they read
6 the entire document. She provided examples, such as
7 not putting the technician's name on the second page
8 of the form or check boxes not being read and checked
9 off.

10 Anthony Bixler, R.Ph., WellSpan York Hospital, Co-
11 Chair Legislative Affairs Committee, Pennsylvania
12 Society of Health-System Pharmacists, asked if it was
13 best for people to reach out via email or via
14 creating a ticket through PALS.

15 Ms. Trimmer replied the email was intended for
16 receipt of documents. If the person has a question,
17 then it would be best to submit a ticket. She
18 reiterated, if the person is looking for forms or
19 documents, then if the employer ccs the technician on
20 the email, then the technician will know the Board
21 received the documents and it is just a matter of
22 processing time. She also noted there are phones
23 being answered between 9:00 a.m. and 2:30 p.m. daily;
24 however, the people answering the phones are also the
25 people processing the applications.

1 Mr. Bixler asked if any thought had been given to
2 what would happen for technicians whose applications
3 were still in processing at the June 28, 2026
4 deadline.

5 Mr. Barrett stated the deadline had been set from
6 the General Assembly, based on the publication of the
7 final regulations. He stated, if someone is a
8 pharmacy technician and they want to practice after
9 June 28, they have to be registered. He urged people
10 to get their applications in as soon as possible to
11 avoid any delays. He added, while some applications
12 are processed quickly, if there are criminal history
13 issues, disciplinary issues or other concerns, it may
14 take longer to review the application.

15 Victoria Elliott, R.Ph., CEO, Pennsylvania
16 Pharmacists Association (PPA), asked if there had
17 been any movement regarding the acceptable time
18 frames in which someone could be grandfathered in.

19 Mr. Barrett reiterated the time frame was fixed by
20 the General Assembly in the bill. He noted a
21 vaccination bill increased the time frame, but there
22 had been no movement on the bill and he doubted
23 anything would change in the next three months.

24 Ms. Elliott asked if any specific communication
25 had been sent out to licensees, specifically

1 pharmacists, alerting them of the technician
2 registration deadline and of the urgency to educate
3 and communicate with technicians to get registered.
4 She explained PPA is receiving many calls from people
5 who are confused about the process and have even
6 tried to register on the PPA website. She thought
7 alerting those who are unregistered of the deadline
8 and process may help avoid a rush at the end.

9 Acting Commissioner Claggett asked if an email
10 blast had been sent out.

11 Ms. Trimmer confirmed the information was included
12 with the renewal for pharmacies. She had another
13 letter to send out that was approved by Mr. Barrett
14 and was with BPOA for the final approval.

15 Acting Commissioner Claggett confirmed an email
16 would be sent out to remind everyone about the
17 process.]

18

19 Appointment - Annual Prosecution Report

20 [Shana M. Walter, Esquire, Deputy Chief Counsel,
21 Prosecution Division, explained the Bureau of
22 Professional and Occupational Affairs (BPOA) provides
23 administrative and legal support to the 29
24 professional and occupational licensing boards and
25 commissions within the department. The Office of

1 Chief Counsel Prosecution Division works with its
2 investigative (BEI) and compliance arms (PCO) who
3 receive complaints, investigate allegations, and
4 enforce compliance with the acts and regulations that
5 govern the boards and commissions. She stated the
6 Prosecution Division consists of 39 attorneys, five
7 of which are senior prosecuting attorneys.

8 Ms. Walter stated the prosecution process always
9 begins with a complaint either from the public or by
10 Board referral. She reported in 2025 the department
11 received approximately 23,000 total complaints for
12 all boards. Ms. Walter provided an overview of the
13 investigative process in which the complaint moves
14 through several levels of review. She noted the
15 primary role of prosecution at Board meetings is to
16 present Consent Agreements to the Board.

17 Ms. Walter explained, after the investigative
18 process, the evidence is reviewed by the prosecuting
19 attorney to determine if they believe there have been
20 any violations of the act or regulations, how
21 sufficient the evidence is and determine if
22 additional files need to be opened. She stated, if a
23 violation is suspected the available options include
24 immediate temporary suspension; filing an order to
25 show cause; automatic suspension; an order for a

1 mental or physical examination; and a petition for
2 appropriate relief if the case violates a previous
3 Board order. Avenues for discipline types are
4 revocation, suspension, probation, public reprimand,
5 civil penalty, remedial education, and cost of
6 investigation. She added all investigations are
7 confidential and are not subject to right-to-know
8 requests.

9 Ms. Walters shared, in 2025, there were 17,354
10 cases opened out of the 23,000 complaints and 19,131
11 cases closed, up significantly from 2024.
12 Specifically for the Pharmacy Board, she reported 967
13 cases were opened with 953 cases closed in an average
14 of less than six months. The penalties included 55
15 monetary, 44 license restrictions, and 159 warning
16 letters. She added when the report was run at the
17 beginning of the year, the Board had 49,606 active
18 licenses and 358 open cases.

19 Chair Roussel thanked the Prosecution team. She
20 stated it was important to remind people that the
21 purpose of the Board is to protect the public, not
22 serve the profession. She noted the Prosecution does
23 a very thoughtful and wonderful job.]

24 ***

25 Appointment - Annual Financial Presentation

1 [Amanda Richards, Fiscal Supervisor, Bureau of
2 Finance and Procurement presented the Board's annual
3 financial presentation. She provided a breakdown of
4 the Board's licensed population, shown on a biannual
5 basis. She noted, for FY24/25, there was a 9 percent
6 increase in licensees over FY22/23. Ms. Richards
7 next presented the current renewal fees for each
8 license class. Current fees are as follows:
9 pharmacist, \$190; authorization to administer
10 injectables, \$30; pharmacy, \$125; technician, \$70;
11 and nonresident pharmacy, \$125. She noted the last
12 fee increase was in 2005.

13 Chair Roussel stated Board Members in the past
14 acknowledged the fee for pharmacy technicians as
15 being higher than they would like. She noted the fee
16 is based on the amount of effort to process and not
17 around the type of income the person doing the job
18 makes. She added the Board sees the amount, and
19 while they do not agree with it, they understand it
20 is not within their control to change.

21 Ms. Richards presented revenue definitions before
22 presenting the Board's revenues broken down by type.
23 She stated the revenue for the prior biennium was
24 \$6,275,692. The projected revenue for the current
25 FY24/25 biennium is \$7,031,285. She noted of the

1 revenue, 87.5 percent comes from renewals and
2 applications.

3 Ms. Richards moved on to the cost category
4 definitions before explaining the Board's
5 expenditures. She noted the expenses are broken down
6 into administrative costs and legal costs. The three
7 ways the expenses hit are via direct charges,
8 timesheet costs, and license population costs. She
9 stated the prior biennium expenses were \$6,334,000
10 and expenses projected for FY24/25 are \$8,303,000.
11 She noted a source of the increase was the expenses
12 for the licensing modernization project.

13 The last page of Ms. Richard's presentation
14 brought the revenue and expenses together. She noted
15 the goal is have the revenue exceed the expenses.
16 However, the biannual balance was in the red starting
17 in FY22 and will continue to go further into the red.
18 She added the pharmacy technician fees were factored
19 into the FY26/27 projections.

20 Mr. Reed asked if the revenue from technician
21 registrations was based on the license count of about
22 2,000 technicians from the beginning of the
23 presentation. He added the Board expected there to
24 be approximately 20,000 pharmacy technicians. He
25 stated projected revenue was not included in the

1 calculations.

2 Ms. Richards explained when the calculations
3 were done, BFP had to use the current license count.

4 Mr. Reed understood and added that the projected
5 number should be considered when thinking about
6 increasing the rates of renewals.

7 Chair Roussel asked for additional details about
8 the licensure modernization and how it impacts the
9 boards.

10 Acting Commissioner Claggett stated the licensing
11 modernization was the replacement for the PALS
12 system. He noted every board will take a piece of
13 the cost of the system.]

14

15 Appointment - Annual Financial Presentation - Fee
16 Package

17 [Taylor Koch, Fiscal Chief, Bureau of Finance and
18 Procurement, presented the proposed fee package. Mr.
19 Koch reviewed information from Ms. Richard's
20 presentation including license counts, revenues, and
21 expenses. He acknowledged the projected 20,000
22 pharmacy technician registrations and stated they
23 would be considered going forward in future reports.
24 License counts would be monitored. In presenting the
25 slide showing the current financial status, he stated

1 due to the Board operating in a deficit, BFP is
2 required by law to recommend a fee package.

3 Mr. Koch explained the BFP targets the two main
4 drivers of revenue starting with application fees.
5 He explained, when looking at application fees, the
6 consideration is how much it takes to process an
7 application such as processing time and review time.
8 The goal is to determine an at cost or face value.
9 He presented the proposed application fees for
10 FY28/29, which was a breakdown of the actual costs
11 associated. He stated the recommendations would take
12 effect partly in September 2028 and partly in August
13 2029 due to the Board's split renewal cycle. The new
14 proposed fees would generate an extra \$570,000 the
15 first year and then \$51,000 and \$53,000 the following
16 out years.

17 Mr. Koch stated, with the increased application
18 fees, the Board would still be in the red, so BFP
19 next turned to the renewal fees. He explained, based
20 off of the current license count and anticipated
21 renewal revenue, BFP recommended a 12 percent
22 increase on all renewals starting in either September
23 2028 or August 2029 with the split renewal cycle.
24 After the initial 12 percent increase, BFP
25 recommended a ten percent and then an eight percent

1 increase. He noted the increases are largely based
2 on factoring in unknown costs in an effort to
3 safeguard the Board against increases like cost of
4 living.

5 Mr. Koch presented the projected financial
6 status, factoring in the recommended fee increases.
7 He noted nothing can be done for the FY26/27 cycle as
8 the implementation of increases takes two to two and
9 a half years. The fee increases will bring the Board
10 out of the red in the first year and will begin to
11 build the restricted reserve balance back up. He
12 explained, with the application and renewal fee
13 increases, the Board could expect a cumulative
14 revenue of an additional \$5.98 million over the next
15 three biennia.

16 Mr. Esterbrook asked if there was a normal amount
17 for a board to have in reserves.

18 Mr. Koch replied the amount varies by board with
19 every board having different fees and license
20 classes. He stated projections are tailored
21 specifically to each board. He noted BFP can look at
22 neighboring states for comparisons.

23 Chair Roussel noted the Board as members of
24 National Association of Boards of Pharmacy (NABP)
25 gets access to the *Survey of Pharmacy Law* that

1 details fees for each state. She noted, for pharmacy
2 renewals, only Guam and Rhode Island have lower fees
3 than Pennsylvania. She added the bottom quartile
4 fall under \$200 with fees going as high at \$900. She
5 wanted to see state comparisons. She was most
6 concerned about increases to interns, pharmacy
7 technicians, and immunization licenses. She asked if
8 there was a way to separate out percentages and
9 discuss where increases are being put.

10 Mr. Koch stated, from the accessible information,
11 he was only able to pull the pharmacist license
12 class. He looked up pharmacy technician and
13 authorization to administer injectables; however,
14 there was not enough states to grasp enough data for
15 comparison. He presented the data obtained for the
16 pharmacist class. The current pharmacist application
17 fee in Pennsylvania is \$45. He noted the proposed
18 \$98 application fee is still lower than the seven
19 states reflected. The current pharmacist renewal fee
20 was in the middle of the states shown. He added even
21 the increased fee would sit in the middle. He was
22 not sure of other states' renewal cycles but did note
23 New York has a three-year cycle.

24 Jill Rebeck, Executive Director, Pennsylvania
25 Society of Health-System Pharmacists, asked the Board

1 to not increase pharmacy technician registration and
2 renewal fees. She stated pharmacists have not had a
3 rate increase in 20 years and asked their renewal
4 fees be increased slightly more instead of
5 technicians. She also noted technicians were still
6 in the process of registering and have much lower
7 salaries when compared to pharmacists.

8 Mr. Reed stated a quick look at neighboring
9 states showed technician fees in other states
10 appeared to be lower than Pennsylvania's \$70. He
11 stated, if the Board can protect a licensing class,
12 it should be the technicians.

13 Chair Roussel described where the fee charts
14 could be found in *Survey of Pharmacy Law* for 2025.
15 She agreed with Mr. Reed's comments. She stated
16 technician fees should not increase over the next six
17 years. She noted pharmacist cannot function without
18 their technicians and significant barriers already
19 exist for technicians to become licensed. She
20 suggested the pharmacist renewal fee could be
21 increased 16 percent instead of 12 percent. She
22 asked if the Board had the ability to separate out
23 increases.

24 Marc Farrell, Esquire, Regulatory Counsel, Office
25 of Chief Counsel, Department of State, stated

1 application fees were strictly based on the amount of
2 time it takes staff to process the average
3 application. He noted, as staff become more familiar
4 with processing a specific kind of application, the
5 cost may come down as it takes less time. He added
6 the Board would not see an immediate effect. Mr.
7 Farrell explained the renewal fees are distributed in
8 a way that is not tied to the same costs but instead
9 are tied to recouping the overhead costs to operate
10 the Board spread out amongst the entire licensee
11 population. He added it would help if the numbers of
12 pharmacy technicians increased as expected as it
13 would help to level out the costs.

14 Chair Roussel wondered if there would be an
15 inverse relationship for the rate charged for a
16 pharmacy technician registration. She stated, if the
17 rate is increased, the number of registrants may
18 decline. She added it could be a barrier to the
19 field. She elaborated that people choose to work in
20 other places with comparable salaries where people
21 smile at them more than in a pharmacy. She repeated
22 her earlier question regarding accepting increase
23 recommendations for some classes while maintaining a
24 flat rate for pharmacy technicians.

25 Mr. Barrett stated the fees would ultimately be

1 up to Counsel as the regulation package is drafted.
2 He could work with Mr. Farrell to balance out the
3 numbers. He was curious about the number of pharmacy
4 techs. He stated the sheer number of technicians
5 could make up for not using the suggested increase.

6 Mr. Michalowski stated, with the increase in
7 licensees and registrants, prosecution costs will
8 rise as there will be more investigations,
9 complaints, and prosecutions. He noted prosecution
10 expects a significant increase in their workload.

11 Terry Talbott, R.Ph., Pharmacy Advocate and
12 Regulatory Consultant, Founder, PraeScriptum
13 Advisors, recalled previous discussion when the
14 technician regulations were being drafted in which
15 people thought the technician fees needed to stay low
16 even if the pharmacy fees needed to be doubled.

17 Anthony Bixler, R.Ph., WellSpan York Hospital,
18 Co-Chair Legislative Affairs Committee, Pennsylvania
19 Society of Health-System Pharmacists, agreed with
20 everyone's comments regarding pharmacy technician
21 fees. He believed pharmacists would much rather take
22 a fee increase on their renewal versus having the
23 increase go to a technician. He noted he is a dual-
24 registered pharmacist and always thinks the
25 Pennsylvania fees are inexpensive compared to the

1 Maryland fees. He added pharmacists probably knew a
2 rate increase was coming and while not concerned for
3 themselves, would be very concerned if the increase
4 was done on the backs of the technicians.

5 Chair Roussel stated all of the information would
6 be helpful and she expected Counsel would provide
7 excellent guidance. She thanked Ms. Richards and Mr.
8 Koch for their presentations and time.]

9

10 Appointment - No MPJE - Michigan Board of Pharmacy &

11 Vermont Board of Pharmacy

12 [Christine Roussel, Pharm.D., BCOP, BCSCP,

13 Chairperson, stated the Michigan and Vermont Boards
14 of Pharmacy had been invited to speak with regards to
15 states that have determined to no longer mandate the
16 multi-state jurisprudence exam. She noted the Board
17 would like to hear historical considerations that
18 lead to the decision, legislative or regulatory
19 changes, which were required, and if there had been
20 any outcomes to the decision.

21 Rony Foumia, Chair, Michigan Board of Pharmacy,
22 shared his respect for the work done by the
23 Pennsylvania Board. He had been with the Michigan
24 Board since 2022 and had been a practicing pharmacist
25 for 30 years as well as being an adjunct professor at

1 the Wayne State University School of Pharmacy. He
2 stated, when the idea of no law exam was brought up,
3 he questioned why the idea would even be considered.
4 However, after listening to the reasoning, he
5 understood why his predecessors were moving in the
6 direction of no law exam.

7 Mr. Foumia stated, in 2023, Governor Whitmer
8 challenged the Department of Licensing to find way to
9 do things differently in Michigan to decrease red
10 tape and barriers. The Department of Licensing sent
11 out a survey and received 16,000 members gave
12 feedback. The *Cutting Red Tape Report* is available
13 at michigan.gov/bpl and contains 80 recommendations
14 based on the 16,000 survey responses. One of the
15 recommendations was to eliminate all law exams for
16 all health professions in Michigan.

17 Mr. Foumia reported pharmacy rule sets have all
18 changed at least once, if not twice in the time he
19 had been with the Board. He noted many of the rules
20 had evolved in the past year and were going to change
21 again in the next month or so. It was found the law
22 exams were not keeping up with the changes. He
23 shared the Michigan Board focused on how law was
24 thought about and could law be taught in a different
25 way. One way they decided to change things was

1 through pharmacist continuing education (CE) rules.
2 Michigan now allows pharmacist to earn live CE by
3 attending Board of Pharmacy meetings. He noted,
4 since the CE change, there has been phenomenal
5 attendance at Board meetings. Another change was to
6 have the pharmacy Board Inspectors present each year
7 on the most common violations so licensees know what
8 their being held accountable to. He noted, as a
9 member of the Board review panel, he is very happy
10 with the results.

11 Mr. Foumia shared, through the *Cutting Red Tape*
12 *Report*, the Bureau of Professional Licensing (BPL)
13 had stated that law exams do not necessarily mean the
14 public is being protected. He noted schools of
15 pharmacy teach law to students prior to graduation.
16 He added, in general, based on the changes being made
17 and how rapidly Michigan laws have changed, going to
18 no exam has been very successful.

19 Chair Roussel asked if the change had required a
20 law change or if they had a path to law changed since
21 Governor Whitmer did the cutting red tape process.

22 Mr. Foumia stated the MPJE was written into their
23 administrative rules, thereby making it up to the
24 Michigan Board to make changes to administrative
25 rules. He noted it took time to make the changes but

1 they had the full support of the BPL.

2 Mr. Esterbrook asked if Michigan had more or less
3 violations since the change.

4 Mr. Foumia replied he could not get into specific
5 numbers but he had no concerns. He had seen no
6 issues in terms of increased complaints or violations
7 related to new grads or from people transferring into
8 Michigan. He had personally observed that it
9 appeared students who only had to worry about the
10 NAPLEX exam, seemed to do better. He noted the
11 University of Michigan was one of four schools
12 nationwide where students scored a 100 percent pass
13 rate. Another Michigan school scored a 95 percent
14 pass rate.

15 Mr. Barrett stated the MPJE in Pennsylvania is
16 sometimes used as a remedial tool for pharmacists who
17 are reentering the field to ensure confidence. He
18 asked if Michigan had a similar tool to remediate the
19 educational aspect with regard to law.

20 Mr. Foumia responded Michigan does not have a
21 similar tool. He added, if a violation occurs, CE is
22 often given. He noted pharmacists transferring into
23 the state have to sign an attestation that they will
24 be held accountable. In addition, if issues are
25 found during an inspection or administrative

1 complaint, the Michigan Board can ask for additional
2 training.

3 Jonathan Ference, Dean, Nesbitt School of
4 Pharmacy, Wilkes University, asked what conversations
5 the State Board had with the Michigan schools of
6 pharmacy leading up to the change.

7 Mr. Foumia explained the administrative rule
8 change process which includes a period for public
9 comment. In addition, he noted the Board has great
10 relationships with the schools of pharmacy.

11 Ms. Trimmer read a chat comment which stated Ohio
12 has a lot of similar policies to Michigan including
13 CE reciprocity for attending Board meetings.

14 Daniel Longyhore, Pharm.D., Ed.D., Geisinger
15 Health, asked if Michigan had seen a change or
16 increase in the number of pharmacists registering in
17 Michigan since the change.

18 Mr. Foumia stated the numbers vary by region
19 within the state. He did not have exact numbers but
20 stated it was a great follow-up question. He added
21 they have seen no difference that not having a law
22 exam has caused any increase in violations. At this
23 point, Mr. Foumia began to experience technology
24 issues causing him to break up repeatedly.

25 Chair Roussel shifted the conversation the

1 Vermont Board of Pharmacy due to the communication
2 issues with Mr. Foumia.

3 Carrie Phillips, Pharm.D., Executive Officer,
4 Vermont Board of Pharmacy, explained the Vermont
5 Board of Pharmacy falls under the umbrella of the
6 Office of Professional Regulation (OPR) which
7 licenses and regulates over 50 professions in the
8 state. She had been with OPR since 2017 and one of
9 her main projects was working on a complete strike
10 and rewrite of Vermont's pharmacy administrative
11 rules which were effective February 1, 2026. She
12 explained the Vermont Board went with a less is more
13 approach, which is why they discussed doing away with
14 an MPJE. She noted one of the ways Vermont went from
15 89 pages with 22 rule parts to 37 pages and 12 rule
16 parts was by referring people to a source document as
17 the definitive source. She added this allows the
18 Board to keep the current rule fresh since rules
19 change fairly regularly.

20 Ms. Phillips explained, in 2020, the Vermont
21 General Assembly passed a uniform process for
22 endorsement for people from other states in order to
23 reduce barriers for licensed professionals. Part of
24 the law was there could be no barriers for any
25 individual currently holding an active license in

1 good standing in another state for a minimum of three
2 years immediately proceeding their date of
3 application in Vermont. One of the barriers would be
4 a law exam so the decision was taken out of the
5 Boards hands for licensure by endorsement.

6 After the 2020 decision, the Vermont Board held
7 discussions and straw polls where five out of five
8 members were in favor or eliminating the exam. In
9 May 2021, the Board took public comment on the topic
10 with the Vermont Pharmacists Association being in
11 favor of eliminating the law exam requirement. A
12 final vote of the Board was taken in June 2021.
13 Seven of the eight Board members were in attendance
14 with five voting in favor of removing the exam, one
15 recusing and one opposed. She noted it made sense to
16 have equal requirements for all pharmacy applicants
17 who all have to go through the clearinghouse at
18 National Association of Boards of Pharmacy (NABP).

19 Ms. Phillips shared numbers from Vermont, noting
20 there were 1,801 licensed pharmacists and 221 out-of-
21 state tele pharmacist license holders. Out of the
22 Vermont license holders, one-third have Vermont
23 addresses with the rest having physical addresses
24 outside of the state. She noted the number of
25 applicants has roughly quadrupled in the last several

1 years. She added there had been no discipline
2 related to eliminating the law exam and there had
3 been no increase in complaints.

4 Chair Roussel commented it was exciting to see an
5 increase in the number of pharmacists applying to
6 practice in Vermont.

7 Ms. Philips explained the Board had considered a
8 number of scenarios for replacing the MPJE. The
9 Board concluded an attestation statement similar to
10 Michigan and Idaho was the best replacement.

11 Chair Roussel thanked Ms. Phillips and Mr. Foumia
12 for their time and perspectives.

13 Porscha Childs, Pharm.D., R.Ph.,
14 Pharmacovigilance Patient Safety Specialist, Novo
15 Nordisk, commented removing the MPJE should be
16 considered as the Commonwealth is a pharmaceutical
17 hub with manufacturers and research institutions that
18 attract pharmacists who would rather go into those
19 areas rather than deal with licensing processes.

20 Terry Talbott, R.Ph., Pharmacy Advocate and
21 Regulatory Consultant, Founder, PraeScriptum
22 Advisors, noted many of the pharmaceutical
23 manufacturers in Pennsylvania do not require an
24 active license to be employed at their site.

25 Chair Roussel noted unfortunately people are

1 graduating and choosing to go the pharma route and
2 not get licensed.]

3 ***

4 Report of Regulatory Counsel

5 [Marc Farrell, Esquire, Regulatory Counsel, Office of
6 Chief Counsel, Department of State, provided an
7 update to the Board's regulations. Regulation 16A-
8 5430, child abuse reporting requirements, is
9 officially complete with the final regs published in
10 the *Pennsylvania Bulletin* on November 29, 2025.

11 Regulation 16A-5434, immunization updates, is a
12 final omitted package bringing the regulations into
13 compliance with statutes passed in 2022 and 2024.
14 Independent Regulatory Review Commission (IRRC) was
15 scheduled to consider the package on March 19, 2026
16 during their publication meeting. If IRRC approves
17 the package, the final regulations should be
18 published by mid-April 2026.

19 Regulation 16A-5432, licensure by endorsement or
20 Act 41, is ready to go into the final rulemaking
21 phase. Mr. Farrell reported all necessary approvals
22 were received in October and November by the
23 Governor's office and Attorney General. The
24 regulation was published in December for comments.
25 No comments were received from IRRC or the public.

1 He anticipated bringing the final package to the
2 Board at the April meeting.

3 Regulation 16A-5435, opioid education, is still
4 in the beginning stages. Mr. Barrett noted he had
5 drafted the Annex and was waiting on approvals before
6 bringing the package to the Board. He added the
7 regulation contains a provision to remove the three-
8 year temporal relation for the immunization course
9 and application which is consistent with other
10 states. He planned to present a package at the April
11 meeting.

12 Mr. Farrell explained Regulation 16A-5427,
13 general revisions, was the priority for 2026 with the
14 goal to get it across the finish line by the end of
15 the year. He stated his office is working on the
16 Preamble and the Regulatory Analysis Form based on
17 the approved Annex.

18 Mr. Farrell stated, if the Board decided to move
19 forward with fee increases, it would have to be done
20 via a regulation package which would be started once
21 a formal vote occurred. In addition, he planned on
22 talking with Prosecution regarding the schedule of
23 civil penalties and may start a regulation package
24 based on the discussions.

25 Chair Roussel stated, while the completion of the

1 regulations was exciting, a lot of progress that
2 would impact patient care was in the general
3 revisions. She asked if there was an opportunity to
4 offer Mr. Farrell resources to assist with the
5 package. She also asked Mr. Farrell if he could
6 describe the Preamble so everyone could understand
7 the effort involved.

8 Mr. Farrell explained the Preamble basically had
9 to justify every change made to the general
10 revisions. The justification had to include the
11 reasoning for the change including why the change was
12 being made; upside of the change; potential downside
13 of the change; who would be happy; and who would be
14 upset by the change. He stated the detailed
15 justification had to be made for each and every time
16 language was deleted or inserted. Due to the
17 extensive nature of the package, he stated he would
18 definitely take up Chair Roussel's offer to help. He
19 was not sure if any of the work could be contracted
20 out as that had not been considered before.

21 Chair Roussel asked Acting Commissioner Claggett
22 to investigate the possibility of contracting help
23 similar to experts who are engaged for legal cases.
24 She noted the revisions had started in 2010.

25 Chair Roussel asked to briefly discuss the law

1 exam. She noted her understanding was a law change
2 would be needed for the Board to either changed the
3 MPJE to the UMPJE or to eliminate the exam entirely.

4 Mr. Barrett stated the exam was actual an area
5 that the Board controlled. Chair Roussel confirmed
6 the same regulatory path could be taken and a best-
7 case scenario would take 12 to 18 months to change.

8 Mr. Barrett noted, among those at the meeting and
9 in the community, people seemed to be moving towards
10 changes with the law exam, changes still seemed to be
11 a minority position in the profession. Therefore he
12 noted depending on the commentary and IRRC, it would
13 likely take longer to execute regulation changes.

14 Chair Roussel asked if the current regulatory
15 language would allow the shift to the UMPJE. She
16 noted UPMJE is being adopted by Ohio, North Carolina,
17 Rhode Island, Iowa, Kansas, Virginia and Indiana as
18 of April 1, 2026.

19 Mr. Barrett stated the MPJE is specifically in
20 the regulation which is why the regulation change is
21 needed and being worked on.

22 Chair Roussel stated NABP is working on an
23 interstate compact which might hinge on states having
24 the UMPJE. She asked if the part of the regulation
25 with the exam could be separated from the rest of the

1 general revisions package to allow the packages to go
2 on separate trajectories given the length of the
3 general revisions Preamble. She noted not everyone
4 was on the same page with the law exam which may hold
5 up the general revisions. She asked again if the
6 Board would actually need to effectuate regulation or
7 if the Board could adopt the UMPJE as another MPJE.

8 Mr. Barrett reiterated, as written, the Board was
9 stuck with the MPJE.

10 Terry Talbott, R.Ph., Pharmacy Advocate and
11 Regulatory Consultant, Founder, PraeScriptum
12 Advisors, stated the only way to get around the red
13 tape might be if NABP stopped offering the MPJE but
14 even then, the Board would likely need to do a waiver
15 to accept the UMPJE.

16 Mr. Barrett stated if NABP stopped offering MPJE,
17 then the Board would likely not have any law exam.

18 Both Chair Roussel and Ms. Talbot noted NABP was
19 not likely to get rid of MPJE.

20 Mr. Barrett noted, with regards to a compact,
21 compacts have to implemented by the General Assembly.
22 If a compact was accepted, the General Assembly could
23 write something into law stating the Board would
24 offer the UMPJE which would override any Board
25 regulations. He noted eliminating the exam entirely

1 seemed to be the most controversial topic, which is
2 why the language in the general revisions was changed
3 to include the UMPJE. He asked if Chair Roussel was
4 looking at starting a separate package for the UMPJE
5 language.

6 Mr. Esterbrook stated the intent of the language
7 in the general revisions package was to allow the
8 Board to choose the exam after the package was
9 approved.

10 Chair Roussel stated the new language was great
11 and should be used. However, she noted with the
12 length of the changes needing detailed
13 justifications, having a separate package with the
14 UMPJE may allow the exam language to be moved along
15 faster as it could be written up much quicker than
16 the entire package.

17 Victoria Elliott, R.Ph., CEO, Pennsylvania
18 Pharmacists Association (PPA), shared if the General
19 Assembly process could potentially expedite the
20 process, there is a bill in legislature with two
21 companion bills. She stated the bill could
22 potentially be amended to include the law exam. She
23 noted PPA had not taken a definitive position on the
24 law exam, but in general people seemed to be in favor
25 of moving towards UMPJE.

1 Chair Roussel stated licensees could work towards
2 amending the bill. She noted the Board was not
3 permitted to push any legislation. She stated the
4 UMPJE train had left the station and many states are
5 already on board. She added for perspective states
6 with no law exam were reporting increased NAPLEX pass
7 rates. She further stated, with the number of people
8 taking NAPLEX decreasing dramatically, the Board had
9 to do their due diligence to reduce licensure
10 barriers in Pennsylvania. She reiterated she felt
11 separating the regulation packages into two would
12 help the pace.

13 Mr. Barrett noted another consideration with the
14 government is contracting. He stated there are
15 contracts for all examinations. With UMPJE being
16 contracted through NABP like MPJE, he did not think
17 it would be arduous to switch exams but contractual
18 arrangements would need reviewed.

19 Jonathan Ference, Dean, Nesbitt School of
20 Pharmacy, Wilkes University commented timing was of
21 the essence when taking into consideration the rate
22 of retirees expected over the next ten years compared
23 to the number of graduates becoming licensed. Rough
24 math showed slightly more than 1,000 pharmacists
25 retiring each year in Pennsylvania; however, there

1 were only 908 graduates in Pennsylvania in 2025. His
2 opinion was the MPJE is a barrier to increasing the
3 number of pharmacists. The only published evidence
4 he had seen was in the *American Journal of*
5 *Pharmaceutical Education* in which a 2023 article
6 elucidated the Idaho experience when they dropped the
7 exam in 2018. He noted the article showed there was
8 no increased risk to public health with the
9 elimination of the exam. He added he was in favor of
10 finding the most expeditious path forward.

11 It was asked if not having a law exam would
12 preclude Pennsylvania from being a part of the NABP
13 compact.

14 Chair Roussel suggested inviting a NABP
15 representative to the next meeting to provide an
16 update on both the UMPJE and the interstate compact.

17 Mr. Barrett stated if the compact was still in
18 the beginning stages. He did not want to dictate
19 what the Board did in the short term based on what
20 may or may not happen down the road with a compact.
21 He stated he would talk with Mr. Farrell and
22 determine if it would be easier to separate the law
23 exam from the general revisions.

24 Ms. Hart commented that NABP should be invited to
25 the next meeting. She added the Board needed to be

1 in step with NABP.

2 Chair Roussel noted with UMPJE going live April
3 1, 2026 in seven states and ten other states
4 promulgating regulation around it, NABP seemed ready
5 for UMPJE.

6 Mr. Barrett commented the motion seemed to be
7 that MPJE was shifting towards UMPJE but asked if
8 there was still a split.

9 Chair Roussel replied about a quarter of stated
10 had either already completed action towards UMPJE or
11 were thinking about it. She stated, when NABP
12 visits, they could be asked for a summary of where
13 all of the states are at.

14 Ms. Elliott stated PPA needed to circle back to a
15 position on the law exam. Chair Roussel added if PPA
16 surveyed their membership, Ms. Elliott could share
17 the information at the next meeting.

18 Jill Rebeck, Executive Director, Pennsylvania
19 Society of Health-System Pharmacists (PSHP), reminded
20 the Board PSHP had provided a prior position
21 statement. She stated PSHP continues to be opposed
22 to any requirements for a law exam.

23 Mr. Ference offered to get a position statement
24 from the American Academy of Colleges of Pharmacy.]

25

1 Review of Applications

2 MR. BARRETT:

3 Based on Executive Session
4 deliberations, I believe the Board
5 would entertain a motion to grant the
6 Pharmacy Technician Registrations of
7 Item No. 15, Dawn Mullin; Item No. 16,
8 Hannah Marraccini; and Item No. 17,
9 John Munoz.

10 MR. ESTERBROOK:

11 So moved, Esterbrook.

12 MS. HART:

13 Hart, second.

14 CHAIR ROUSSEL:

15 Any discussion? Let's call the vote.

16

17 Reed, aye; Hart, aye; Esterbrook, aye;
18 Claggett, aye; Slagle, aye; Pohlhaus,
19 aye; Roussel, aye.

20 [The motion carried unanimously.]

21

22 MR. BARRETT:

23 Based on Executive Session
24 deliberations, at Item No. 18, I
25 believe the Board Chair would entertain

1 a motion to grant the Nonresident
2 Reactivation of Episcopo's Pharmacy.

3 MR. ESTERBROOK:

4 So moved, Esterbrook.

5 MS. HART:

6 Hart, second.

7 CHAIR ROUSSEL:

8 Any discussion? Let's call the vote.

9

10 Reed, aye; Hart, aye; Esterbrook, aye;
11 Claggett, aye; Slagle, aye; Pohlhaus,
12 aye; Roussel, aye.

13 [The motion carried unanimously.]

14

15 MR. BARRETT:

16 Based on Executive Session
17 deliberations, at Item No. 19, I
18 believe the Board Chair would entertain
19 a motion to provisionally deny the new
20 Nonresident Pharmacy Application of
21 National Health Rx.

22 MR. ESTERBROOK:

23 So moved, Esterbrook.

24 MS. HART:

25 Hart, second.

1 CHAIR ROUSSEL:

2 Any discussion? Let's call the vote.

3

4 Reed, aye; Hart, aye; Esterbrook, aye;
5 Claggett, aye; Slagle, aye; Pohlhaus,
6 aye; Roussel, aye.

7 [The motion carried unanimously.]

8

9 MR. BARRETT:

10 And then at Item No. 20, based on
11 Executive Session deliberations, I
12 believe the Board Chair would entertain
13 a motion to approve the Change in
14 Controlling Interest of Synergy
15 Pharmacy.

16 MR. ESTERBROOK:

17 So moved, Esterbrook.

18 MS. HART:

19 Hart, second.

20 CHAIR ROUSSEL:

21 Any discussion? Call the vote.

22

23 Reed, aye; Hart, aye; Esterbrook, aye;
24 Claggett, aye; Slagle, aye; Pohlhaus,
25 aye; Roussel, aye.

1 [The motion carried unanimously.]

2

3 Discussion - Attendance at the NABP Annual Meeting,
4 May 12-15, 2026, in Boston, MA

5 [Christine Roussel, Pharm.D., BCOP, BCSCP,

6 Chairperson, explained the NABP Annual meeting was
7 where representatives from all states, Guam, and some
8 location in Canada would meet. She noted there is
9 always a delegate to represent Pennsylvania in voting
10 matters. She added Pennsylvania was the host state
11 for District 1 and 2. Pennsylvania was involved in
12 proposing resolutions to be voted on.]

13

14 MR. ESTERBROOK:

15 I make a motion to send three Members
16 to the May 2026 meeting for NABP.

17 MS. HART:

18 Hart, second.

19 CHAIR ROUSSEL:

20 Any discussion around that? Call the
21 vote.

22

23 Reed, aye; Hart, aye; Esterbrook, aye;
24 Claggett, aye; Slagle, aye; Pohlhaus,
25 aye; Roussel, aye.

1 [The motion carried unanimously.]

2

3 Discussion - MPJE Exam Question Writing

4 [Arion R. Claggett, Acting Commissioner, Bureau of
5 Professional and Occupational Affairs, stated the
6 discussion would be tabled to gather additional
7 information before being brought back to the Board.]

8

9 Discussion - Rural PA

10 [Christine Roussel, Pharm.D., BCOP, BCSCP,
11 Chairperson, discussed speaking with Secretary of
12 Health Deb Bogen regarding rural health issues
13 related to maternal fetal outcomes and small
14 hospitals closing around the state. In the
15 conversation, she learned the Office of Rural
16 Pennsylvania published a document in June of 2025 on
17 pharmacy deserts. She noted the document highlighted
18 the amount of pharmacies closing in Pennsylvania and
19 how patients often lose access. She added pharmacy
20 deserts can occur in both rural and urban settings
21 and the definition changes dependent on the setting.

22 Chair Roussel suggested the Board invite the
23 Office of Rural Pennsylvania to the April 28, 2026
24 meeting to present their pharmacy desert document for
25 discussion.]

1 ***

2 Discussion - Potential Date Changes

3 [Christine Roussel, Pharm.D., BCOP, BCSCP,

4 Chairperson noted there were conflicts with meeting
5 dates. The Board discussed potential date changes.]

6 ***

7 MR. ESTERBROOK:

8 I make a motion to change the dates as
9 proposed by the Board Chair.

10 CHAIR ROUSSEL:

11 So then the new dates would be June 23,
12 2026; December 18, 2026; and December
13 13, 2027.

14 MR. ESTERBROOK:

15 So moved.

16 MS. HART:

17 Second, Hart.

18 CHAIR ROUSSEL:

19 Excellent. Any discussion? Let's call
20 the vote.

21
22 Reed, aye; Hart, aye; Esterbrook, aye;
23 Claggett, aye; Slagle, aye; Pohlhaus,
24 aye; Roussel, aye.

25 [The motion carried unanimously.]

1 ***

2 [Christine Roussel, Pharm.D., BCOP, BCSCP,
3 Chairperson, welcomed Molly Pohlhaus, Deputy Attorney
4 General, to the Board. Ms. Pohlhaus stated she was
5 an attorney with the healthcare section and was the
6 new designee for the Attorney General. She spent the
7 last couple of years with the Dental Board and was
8 excited to be with the Pharmacy Board.]

9 ***

10 [Arion R. Claggett, Acting Commissioner, Bureau of
11 Professional and Occupational Affairs, exited the
12 meeting at 12:53 p.m.]

13 ***

14 Report of Board Counsel - Sunshine Act

15 [Sean Barrett, Esquire, Board Counsel presented the
16 biannual Sunshine Act and Recusal Guidelines
17 Presentation. He summarized that the Sunshine Act
18 ensures transparency in government by requiring open
19 meetings for all official actions and deliberations
20 involving agency matters. Any time a quorum of Board
21 members meets to discuss Board business, the meeting
22 must be publicly advertised. Deliberations are
23 defined as discussions intended to lead to decisions,
24 and official actions include votes or policy
25 decisions.

1 Public notice of meetings must be issued at the
2 beginning of the calendar year and at least three
3 days in advance, with any changes requiring 24-hour
4 notice. Emergency meetings are exempt but must be
5 justified. All meetings and Agendas are posted
6 publicly, including in the Pennsylvania Bulletin and
7 on the Board's website.

8 Mr. Barrett noted that amendments to the Sunshine
9 Act in 2021 require that if the agenda changes within
10 24 hours of the meeting, an amended agenda must be
11 published afterward. Meeting locations and agendas
12 must be made available in advance, and discussions
13 outside the posted agenda are only allowed if there
14 is a natural connection. All votes must be publicly
15 cast, so virtual participant members must have
16 cameras on. Meeting minutes must include the time,
17 place, attendance, and substance of discussions,
18 though not verbatim. Executive Sessions may be held
19 for limited purposes, such as discussing litigation
20 strategy, deliberation matters, or personnel issues,
21 though personnel issues typically fall outside Board
22 purview. Executive Sessions must be announced with
23 reasons and remain confidential even after the
24 meeting.

25 He warned that violations of the Sunshine Act can

1 invalidate meeting actions and lead to litigation or
2 attorney fees. Criminal penalties are rare and
3 require District Attorney action. He clarified that
4 actions of Board committees like the Application
5 Committee or Probable Cause Committee are not
6 considered to be a meeting if there is no quorum and
7 if actions are preliminary or administrative.

8 Regarding recusals, Mr. Barrett outlined the
9 types of recusals and the impact of those recusals.
10 Mandatory recusals include involvement in
11 prosecution, being a complainant, or having a direct
12 financial interest. Strongly recommended recusals
13 include personal connections or outside knowledge of
14 a case. Discretionary recusals apply when
15 impartiality is uncertain. He advised Board members
16 to consult Counsel in advance when unsure.
17 Abstentions from voting are allowed for lack of
18 preparation or uncertainty but prevent a member from
19 requesting reconsideration later. Members may still
20 attend for quorum purposes, but recusals count
21 against quorum.

22 He also detailed conflict-of-interest rules.
23 Professional members may not serve as officers or
24 agents of statewide professional associations, and
25 public members may not be part of the regulated

1 profession or have immediate family members who are.
2 Public members must not hold any other appointed
3 office in the Commonwealth.]

4

5 [Christine Roussel, Pharm.D., BCOP, BCSCP,
6 Chairperson recapped a to-do list from the meeting.
7 She stated invitations for the April 28, 2026 would
8 be extended to Neil Watson at NABP to discuss UMPJE
9 and the Office of Rural Pennsylvania to discuss
10 pharmacy deserts. The Survey of Pharmacy Law would
11 be shared with the entire Board and BFP. Chair
12 Roussel also noted she would like to have the Board
13 Inspectors visit to present the most common
14 violations and potentially CE credit associated with
15 the violations. She also noted communication would
16 be sent to BEI and DOH regarding inspection forms.]

17

18 Adjournment

19 MR. ESTERBROOK:

20

Motion to adjourn.

21 MS. HART:

22

Second.

23 CHAIR ROUSSEL:

24

Any opposed? I don't think we have to

25

call the vote. We could just adjourn.

1 Thank you.

2 ***

3 [There being no further business, the State Board of
4 Pharmacy Meeting adjourned at 1:04 p.m.]

5 ***

6
7 CERTIFICATE

8
9 I hereby certify that the foregoing summary
10 minutes of the State Board of Pharmacy meeting, was
11 reduced to writing by me or under my supervision and
12 the minutes accurately summarize the substance of the
13 State Board of Pharmacy meeting.

14
15
16 

17 Erin Badstuebner,

18 Minute Clerk

19 Sargent's Court Reporting
20 Service, Inc.

STATE BOARD OF PHARMACY
REFERENCE INDEX

February 24, 2026

	TIME	AGENDA
1		
2		
3		
4		
5		
6		
7		
8		
9	9:00	Executive Session
10	10:30	Return to Open Session
11		
12	10:30	Official Call to Order
13		
14	10:30	Introduction of Board Members/Attendees
15		
16	10:35	Approval of Minutes
17		
18	10:36	Report of Prosecution
19		
20	10:47	Report of Board Counsel
21		
22	10:48	Report of Board Chairperson
23		
24	10:49	Report of Executive Secretary
25		
26	11:00	Appointment - Annual Prosecution Report
27		
28	11:06	Appointment - Annual Financial
29		Presentation
30		
31	11:45	Appointment - No MPJE - Michigan Board
32		of Pharmacy and Vermont Board of
33		Pharmacy
34		
35	12:12	Report of Regulatory Counsel
36		
37	12:40	Review of Applications
38		
39	12:44	Discussion
40		
41	12:51	Report of Board Counsel - Sunshine Act
42		and Recusal
43		
44	1:04	Adjournment
45		
46		
47		
48		
49		
50		