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July 2, 2025

Iowa Board of Pharmacy
400 SW 8th Street, Suite E
Des Moines, IA 50309

Re: Request to Remove 657 IAC 552.22(4) — NRC ARC 9338C Compounding Data Reporting Requirement

Dear Members of the Board,

I am writing regarding the recently published administrative rulemaking (ARC 9338C), which amends 657 IAC 552.22 and introduces a new annual reporting requirement:

"Each licensed pharmacy located in Iowa that dispensed compounded preparations for human use interstate in the previous calendar year will report compounding data to the NABP information sharing network, annually prior to April 1."

I contacted the National Association of Boards of Pharmacy (NABP) regarding the data-sharing system referenced in this rule. NABP confirmed that the Information Sharing Network (ISN) is currently not fully functional or available for pharmacy reporting. While NABP has deployed some dashboard and inspection data tools, pharmacies still cannot upload interstate compounding data into an operational system supporting the rule's intent.

Given that:

1. The infrastructure to support the requirement does not exist,

2. The rule lacks clear instructions regarding what data should be captured and in what format, and

3. Enforcement could unfairly penalize pharmacies through no fault of their own,

I respectfully request that the Board remove 657 IAC 552.22(4) from ARC 9338C. This action will prevent confusion and undue compliance burden.

Once the NABP ISN is fully operational, with an accessible portal, comprehensive instructions, and usable infrastructure, the Board may revisit reporting requirements under a separate rulemaking. At that point, a phased implementation would enable pharmacies to comply faithfully without arbitrary deadlines.

Thank you for your thoughtful consideration of this request. I am happy to meet or provide additional input to ensure the Board can effectively regulate compounding pharmacy practices in Iowa.

Sincerely,

Scott Brunner, CAE
Chief Executive Officer