



August 28, 2024

**Nicki Chopski, PharmD**

Executive Director  
Idaho Board of Pharmacy  
1199 Shoreline Lane, Suite 303  
Boise, ID 83702

Re: Docket No. 24-3601-2402

Dear Dr. Chopski,

I am writing on behalf of the Alliance for Pharmacy Compounding to express our thoughts on the proposed rules for pharmacy practice currently under consideration by the Idaho State Board of Pharmacy. We appreciate the ongoing efforts of the Board to enhance and modernize pharmacy practice in Idaho, and we would like to commend the inclusion of provisions that allow pharmacists to prescribe medications, including controlled substances. This recognition of pharmacists' capabilities as trained healthcare professionals is a significant step forward and reflects a progressive approach to patient care.

However, we wish to express our ongoing concern regarding the 503B wholesaling provision, which has not been addressed in the proposed amendments. As we emphasized in our earlier letter, the current provision limits the ability of 503B outsourcing facilities to distribute compounded medications to 503A pharmacies for dispensing, which can have a negative impact on patient access to necessary treatments. We strongly urge the Board to reconsider this aspect of the rules to better align with the needs of healthcare providers and patients.

On a positive note, we are pleased with the compounding rules section of the proposed changes. These updates demonstrate a clear understanding of the importance of responsible compounding practices while ensuring compliance with regulatory standards. The thoughtful approach taken by the Board in this area is commendable, and we believe it will support high-quality care for patients in Idaho.

We appreciate the opportunity to provide feedback on these important regulatory matters and remain committed to working with the Board to ensure that pharmacy practice in Idaho continues to advance in a way that benefits both healthcare providers and patients.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Brunner'.

Scott Brunner, CAE  
Chief Executive Officer  
scott@a4pc.org