

100 Daingerfield Road, Suite 100
Alexandria, VA 22314

www.a4pc.org

January 29, 2024



Illinois Board of Pharmacy
Department of Financial and Professional Regulation
Attention: Craig Cellini
320 West Washington, 2nd Floor
Springfield, IL 62786

RE: Section 1330.550 Nonresident Pharmacies

Dear Board Members:

Thank you for the opportunity to share input on the proposed amendment to Section 1330.550 regarding nonresident pharmacies.

The Alliance for Pharmacy Compounding is the voice for pharmacy compounding, representing more than 600 compounding small businesses – including compounding pharmacists and technicians in both 503A and 503B settings – as well as prescribers, educators, researchers, and suppliers.

While APC does not have a strong opposition to the proposed amendment requiring the pharmacists-in-charge of nonresident pharmacies to be licensed in Illinois, we are concerned about the enforcement timeline. The proposed amendment was introduced December 15, 2023, and comments are not due until January 29, 2024, yet the new amendment goes into effect January 1, 2024. This gives pharmacists-in-charge at nonresident pharmacies who are not already licensed in the state absolutely no time to come into compliance with the new rule.

We ask that the board consider a minimum of a 6-month delay on enforcement on the new licensure requirement to allow pharmacists to schedule and take any necessary tests and complete all licensure requirements so that the operations of nonresident pharmacies are not interrupted, and patient access is maintained.

Again, we urge the board to delay enforcement of this proposed amendment. Please direct any questions to APC's Savannah Cunningham at savannah@a4pc.org.

Best,

A handwritten signature in blue ink, appearing to read "S. Brunner".

Scott Brunner, CAE
Chief Executive Officer