Chair Haadsma and the Joint Committee on Administrative Rules:

I am reaching out on behalf of the Michigan Pharmacists Association to express concerns regarding the recent changes to proposed R 338.519 – specifically, the removal of the multistate pharmacy jurisprudence exam (MPJE) requirement for new licensees. While we are sympathetic to the Board’s opinion regarding the MPJE and its ability to truly evaluate a prospective licensee’s comprehension of pharmacy jurisprudence, our concern lies with the nature in which this decision was made.

While the proposal to remove the MPJE as a requirement for licensure by endorsement under R 338.523 was discussed by the Board of Pharmacy Rules Work Group held on Wednesday, June 7, the initial proposal did not discuss removing the requirement under Rule 19. The proposal was then reported from the Board of Pharmacy on Wednesday, June 14. The public was denied the opportunity to provide any additional comments on the change removal of the MPJE, despite the Rules Work Group meeting for a second time on Tuesday, June 13.

We believe that the decision to remove the MPJE requirement under Rule 19, had it been announced in the draft rule proposal, would have materially changed the comments issued to the Department and the Board. The decision to remove the MPJE as a requirement for licensure by endorsement is significantly different from removing it entirely. To make this decision absent a proposal in the draft published by the Department denies the opportunity for a robust dialogue between the Board and stakeholders such as educational institutions, employer groups, and legal experts specializing in pharmacy law.

Under this rationale, the Michigan Pharmacists Association respectfully requests that JCAR consider halting the implementation of the Pharmacy General Rules reported by the Board of Pharmacy on June 14. We would welcome the opportunity for a more extensive discussion regarding the removal and/or potential replacement of the MPJE as a requirement for initial licensure.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

Eric Roath

Director of Government Affairs

Michigan Pharmacists Association