

June 27, 2023

Joint Committee on Administrative Rules
Boji Tower - 3rd floor
124 West Allegan St.
PO Box 30036
Lansing, MI 48909-7536

Dear Chair Haadsma and Joint Committee:

We are reaching out today regarding the recently proposed changes to R 338.519. Specifically, the removal of the Multistate Pharmacy Jurisprudence Examination[®] (MPJE[®]) requirement for pharmacist licensure.

Association Background

By way of introduction, the National Association of Boards of Pharmacy[®] (NABP[®]) is a 501(c)(3) nonprofit organization founded in 1904. We support and work with our members, the state boards of pharmacy, to protect public health. NABP was established to assist the state boards of pharmacy in creating uniform education and licensure standards. Our members consist of the 50 United States - state boards of pharmacy, as well as the boards in District of Columbia, Guam, Puerto Rico, the Virgin Islands, 10 Canadian provinces, and the Bahamas. Today, we help support patient and prescription drug safety, through examinations that assess pharmacist competency, pharmacist licensure transfer, various pharmacy/drug distributors accreditation, and inspection programs. Our membership and staff combine diverse skills and backgrounds, which helps us create innovative programs that meet the public health protection needs of today.

Background - Competency Assessment Programs

In 1960, NABP member boards of pharmacy recognized the need for a national licensure examination to be developed using uniform standards. A national licensure examination would address the growing complexities of pharmaceutical sciences and pharmacy practice and help to ensure that all new practitioners entering the field meet competency standards. In response, NABP developed the North American Pharmacist Licensure Examination[®] (NAPLEX[®]). The computer based NAPLEX is utilized by all **54 member boards** to determine if a candidate for licensure in their state has the knowledge and skills necessary to safely and effectively practice entry-level pharmacy.

After the success of the NAPLEX, member boards identified the need to assess a candidate's knowledge of pharmacy law and asked NABP to assist in developing state-specific law examinations. In 1997, the computer based Multistate Pharmacy Jurisprudence Examination (MPJE) was developed and customized for each participating state. The MPJE combines federal and state-specific law questions to serve as the state jurisprudence examination. NABP also allocates resources to assist the member boards with maintaining the exam questions to assure the examination is reflective of the current Michigan pharmacy laws and regulations. Currently, **48 jurisdictions require** a passing score on the MPJE to obtain pharmacist licensure. Additionally, 2 jurisdictions administer their own jurisprudence examination as a requirement for pharmacist licensure. At present, Idaho and Vermont do not require a jurisprudence examination for pharmacist licensure.

The Role of MPJE

Jurisdictions rely on the MPJE score as an important metric in assessing a candidate's knowledge of pharmacy law. A thorough understanding of applicable laws and regulations in their state of licensure is an essential part of every pharmacist's ability to perform at the top of their profession as well as ability to apply that knowledge in their practice setting. NABP continues to support and maintain the MPJE as a resource for states to evaluate that knowledge.

The knowledge, skills, and abilities tested by the MPJE are not secondary to clinical knowledge, but complementary to it. To further adapt to the needs of the boards of pharmacy and patient safety, NABP regularly reviews the blueprint of its examinations and revises regularly to evolve with the changes of current pharmacy practice. The MPJE competency areas allow for a more useful breakdown of a candidate's performance and provides reports with valuable feedback to understand where a candidate needs to focus their study efforts. In addition, as laws and regulations change quickly, NABP has taken steps to ensure that test items that are no longer relevant can be quickly removed at any time.

Michigan pharmacy practice laws and regulations are in place to safeguard patients and uphold the legal responsibilities of the pharmacist as well as other pharmacy personnel. With that said, MPJE assesses whether a pharmacist candidate can accurately apply the state's pharmacy laws and regulations to assure that medications are safely dispensed to patients.

We hope the above background and information proves helpful while you consider the proposed changes to R 338.519 and the potential to remove the MPJE licensure requirement. NABP welcomes the opportunity to discuss further or provide additional information for the Committee's consideration. Thank you for your consideration and for the care you take to ensure protecting public health.

Sincerely,

A handwritten signature in black ink, appearing to read "Al Carter", with a long horizontal flourish extending to the right.

Lemrey "Al" Carter, Executive Director/Secretary

Enclosures: *Michigan Pharmacists Association Letter*

cc: Michigan Board of Pharmacy
Licensing and Regulatory Affairs – State of Michigan
Michigan Pharmacist Association
NABP Executive Committee