

From: no-reply@iowa.gov
To: [Witkowski, Terry \[IBPE\]](#)
Cc: renae.chesnut@drake.edu
Subject: Public Comment Received on ARC 2301C
Date: Monday, December 28, 2015 8:30:01 PM

A new public comment has been received on **ARC 2301C**. The comment and contact information are listed below.

Comment

As the Interim Dean of Drake University College of Pharmacy & Health Sciences, I write to support this change in the Board of Pharmacy rules. Our curriculum, and the ACPE accreditation standards, requires that students complete experiential rotations (introductory and advanced) in practice settings requiring them to be licensed as interns. In the past, the requirement of a social security number has been an issue for our international students. Therefore, we support the use of another identifier besides the social security number so that our international students can be licensed as interns, allowing them to fulfill the required educational curriculum for our program.

Contact Information

Name: **Renae Chesnut**
Email: renae.chesnut@drake.edu
Phone: **(515) 271-2883**



COLLEGE OF PHARMACY
Office of Academic Affairs

115 S. Grand Avenue, Room 127
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319-335-8795 Fax 319-335-8079
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December 28, 2015

Iowa Board of Pharmacy
400 SW 8th St.
Des Moines, IA 50309

Board of Pharmacy,

I write to support the proposed amendment to Chapter 4, "Pharmacist-Interns," Iowa Administrative Code. The change to accept either a social security number or an individual tax identification number (ITIN) will make it possible for students that are not citizens to more readily obtain the intern license which is required to participate in our program. It will also allow them to gain employment as a technician/intern. These students all pay out of state tuition and have previously been limited to jobs on campus in non-pharmacy related part-time positions. This will help them earn money and gain valuable experience, but it will also provide Iowa pharmacies with a larger pool of student pharmacists. There will also be some tax benefits to the state.

You can be confident that our non-citizen pharmacy students meet the same high standards as all other students. They are typically very hard working and compassionate, caring individuals. This change will improve their situation and support our educational mission. I thank you for proposing this amendment and your support.

Respectfully,

Michael W. Kelly, PharmD, MS
Clinical Professor and Associate Dean for Professional Education

From: no-reply@iowa.gov
To: [Witkowski, Terry \[IBPE\]](mailto:Witkowski_Terry_IBPE)
Cc: apudlo@iarx.org
Subject: Public Comment Received on ARC 2301C
Date: Monday, December 28, 2015 3:35:26 PM

A new public comment has been received on **ARC 2301C**. The comment and contact information are listed below.

Comment

December 29, 2015 Iowa Board of Pharmacy 400 S.W. Eighth Street, Suite E Des Moines, IA 50309-4688 Dear Iowa Board of Pharmacy Members: The Iowa Pharmacy Association would like to submit comments to the Board of Pharmacy regarding the Notice of Intended Action approved by the Board on November 4, 2015 to amend elements required for registration as a pharmacist-intern. IPA has a collaborative relationship with each college of pharmacy in Iowa, Drake University and the University of Iowa, as well as student pharmacists through outreach and education about professional engagement and leadership development. With the national and international appeal to the pursuit of pharmacy education in the state of Iowa, the profession as be seen more foreign students receive their professional degree from either of the college of pharmacy. While those students may not wish to become a permanent resident of Iowa and have no social security number, we recognize these regulatory changes as beneficial to the student pharmacists that want to learn about the practice of pharmacy in Iowa. We value the Board of Pharmacy's willingness to accommodate these student pharmacists. We hope this regulatory change will reduce some burden on the Board of Pharmacy staff that may have to work individually with these student pharmacists and their respective college of pharmacy. We have no further recommendations at this time. Thanks for the opportunity to provide feedback to the Board of Pharmacy. Sincerely, Kate Gainer, PharmD Executive Vice President & CEO Anthony Pudlo, PharmD, MBA, BCACP Vice President, Professional Affairs Iowa Pharmacy Association 8515 Douglas Avenue, Suite 16 Des Moines, IA 50322

Contact Information

Name: **Anthony Pudlo**
Email: apudlo@iarx.org
Phone: **(515) 270-0713**

From: no-reply@iowa.gov
To: [Witkowski, Terry \[IBPE\]](#)
Cc: vera.malkhasyan@gmail.com
Subject: Public Comment Received on ARC 2301C
Date: Sunday, December 27, 2015 10:34:07 PM

A new public comment has been received on **ARC 2301C**. The comment and contact information are listed below.

Comment

I believe that the amendment regarding the intern registration with ITIN is a great breakthrough in Iowa board rules for intern registration. Both, the international graduates as well as lowan pharmacies will benefit from it. First of all, it will allow the international students and graduates to improve their life and career satisfaction, allow to maintain higher professional confidence without long breaks in education/employment. Along with that, this amendment could help to fill the job openings and enrich pharmacy interns job market with highly qualified and motivated specialist. Eventually, that would encourage the competition among interns seeking for the permanent position of a pharmacist, thus improving the quality of the employed specialists. Besides, the new rule for registration will add significant tax payments to State and Federal budgets.

Contact Information

Name: **Vera Malkhasyan**
Email: vera.malkhasyan@gmail.com
Phone: **(203) 824-9419**

From: [McCormick, Patricia A](#)
To: [Witkowski, Terry \[IBPE\]](#)
Subject: RE: Regarding ITIN
Date: Monday, October 26, 2015 12:47:01 PM

Hi Terry,
That's perfect!
Thanks, Pat

From: Witkowski, Terry [IBPE] [mailto:Terry.Witkowski@iowa.gov]
Sent: Monday, October 26, 2015 12:39 PM
To: McCormick, Patricia A <patricia-mccormick@uiowa.edu>
Subject: Regarding ITIN

Hi, Pat,

The Board of Pharmacy will be considering an amendment to the requirements for a pharmacist-intern registration with the Board in consideration of the information you provided regarding certain foreign students.

Please review the attached and let me know if you believe the amendment proposed is acceptable or is there something more that should be done to ensure these students are able to participate in internship programs?

This proposed rulemaking will be considered by the Board at their meeting on November 4, 2015. Thank you for your assistance.

Therese (Terry) Witkowski
Executive Officer
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The Iowa Board of Pharmacy promotes, preserves, and protects the public health, safety, and welfare through the effective regulation of the practice of pharmacy and the licensing of pharmacies, pharmacists, and others engaged in the sale, delivery, or distribution of prescription drugs and devices. Iowa Code § 155A.2(1).

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