



Board of Pharmacy Response to Governor's Proclamation

On March 22, 2020, Governor Kim Reynolds issued a [Proclamation of Disaster Emergency](#). In this Proclamation, Governor Reynolds temporarily suspended a number of regulatory provisions applicable to a number of professions, including the practice of pharmacy. The Proclamation eases administrative rules relating to continuing education, renewal of licenses, internship requirements, background checks, pharmacist licenses, technician trainee registrations, and exam testing requirements. *The suspension of rules identified in the Proclamation is effective through April 16, 2020, unless the Governor terminates or extends it in writing prior to that date.* As required in the Proclamation, the Board hereby issues this guidance relating to the temporary suspension of administrative rules in these areas which directly impact the Board of Pharmacy and 657 Iowa Administrative Code.

In Section Four, Governor Reynolds temporarily suspends specific rules relating to professional and occupational licensure.

- *For pharmacists*: The Governor has temporarily suspended rules that would otherwise prohibit a pharmacist whose license is inactive or lapsed from practicing (if the license has been inactive or lapsed for a period of less than five years prior to March 22), thereby allowing a pharmacist whose license has been inactive or lapsed within the last five years to resume practicing pharmacy for the duration of the public health disaster emergency. A pharmacist is not required to reactive his/her license prior to resuming practice for the duration of the public health disaster emergency. The Governor's action does not permit pharmacists whose licenses have been voluntarily surrendered or revoked to return to practice. A pharmacist returning to practice pursuant to this authorization does not need to contact the Board.
- *For technician trainees*: The Governor's action temporarily suspends the rules relating to a technician trainee whose registration is expiring during an extended period (March 22 through May 31) to allow the technician trainee to continue to practice as a technician while their registration is expired and the technician is unable to obtain national certification due to the closure of testing locations. A technician trainee who continues to work pursuant to this authorization does not need to contact the Board.

In Section Five, Governor Reynolds temporarily suspends rules relating to continuing education deadlines or requirements as a condition of license renewal, reinstatement, or reactivation. The only license upon which continuing education is required in Board rules as a condition of license renewal, reinstatement, or reactivation is the pharmacist license.

- *For a pharmacist whose license is current and active and due to renew in 2020*: Pharmacist licenses must be renewed prior to July 1. At this time, the Governor's Proclamation is set to expire on April 16. Accordingly, the Board does not anticipate the continuing education requirements will be impacted by this public disaster. The Board will continue to monitor the situation and provide additional guidance should the disaster be extended beyond April 16.
- *For a pharmacist whose license is inactive*: Pursuant to the March 22 Proclamation, if a pharmacist's license has been inactive for less than five years, the pharmacist may resume practice to assist during this public health emergency without seeking reactivation. For pharmacists wishing to reactivate in order to practice beyond the duration of the public health disaster emergency, the pharmacist must apply for reactivation pursuant to rule 2.13.

In Section Six, Governor Reynolds temporarily suspended rules relating to license renewal. *The suspension applies to licenses and registrations which expire between March 22 and April 16 only.* The Board of Pharmacy is operational at this time and licensing staff is continuing to process license and registration renewals. The Board has no expectation at this time that applications will not be processed as normal. Licensees and registrants are encouraged to utilize the Board's online renewal process (more information can be found [here](#)). Licensees and registrants who are unable to renew and whose license or registration expires prior to April 16 are authorized to continue practice until they are able to submit for renewal. While the Governor's Proclamation is currently set to expire on April 16, the Board intends to exercise enforcement discretion for licensees who are covered under this Proclamation to allow the licensee or registrant 30 days from the expiration of the Proclamation (including any extension or additional directive from the Governor) to obtain renewal of their license or registration and will not incur a late penalty fee.

In Section Seven, Governor Reynolds temporarily suspended rules relating to the completion of clinical, practical, or internship experience as a condition of obtaining professional licensure. This suspension included the requirement that pharmacist interns complete 1500 hours of clinical experience. Iowa-licensed pharmacist-interns who are currently completing or who are scheduled to complete their experiential program to qualify for graduation in the spring of 2020, and who are unable to complete the college-based clinical program due solely to the COVID-19 pandemic, will continue to be eligible for pharmacist licensure in Iowa if all other licensure requirements are met.

In Section Eight, Governor Reynolds temporarily suspends the requirement of background checks as a condition for obtaining professional licensure.

- *For Iowa-licensed pharmacist-interns completing their experiential program and anticipating to initiate the licensure process following graduation:* Currently, the proclamation is set to expire on April 16, and therefore this suspended background check requirement may not apply to current students. In the event the proclamation is extended, the Board will issue further guidance.
- *For pharmacists seeking licensure in Iowa via license transfer:* Applications for license transfer will be processed for the duration of the public health disaster emergency, temporarily deferring the completion of the background check. Upon the termination of the public health disaster emergency, Board staff will supply fingerprint packets to those who must still undergo a criminal history background check. A licensee whose background check was deferred due to the Governor's Proclamation must return the completed fingerprint packet to the Board within 60 days of the expiration of the Proclamation. Failure to timely return the packet may result in license rescission.
- *For facility managers of third-party logistics providers and wholesale distributors, and supervising pharmacists of outsourcing facilities:* Applications for licensure will be processed for the duration of the public health disaster emergency, temporarily deferring the completion of the background check. Upon termination of the public health disaster emergency, Board staff will supply fingerprint cards to those facility managers who must still undergo a criminal history background check. A facility manager whose background check was deferred due to the Governor's Proclamation must return the completed fingerprint packet to the Board within 60 days of the expiration of the Proclamation. Failure to timely return the packet may result in license rescission.

In Section Thirteen, Governor Reynolds temporarily suspended the rule that requires a pharmacist licensure candidate to complete both licensure examinations within one year of the candidate passing one examination. If a candidate has previously passed one examination (NAPLEX or MPJE-Iowa Edition) and, due to the closure of testing locations, is unable to sit for the second examination and the candidate is nearing the expiration of the original one-year deadline to complete the second examination, the one-year deadline is waived for the period of the Proclamation (currently through April 16). The Board will continue to monitor and may exercise enforcement discretion following the expiration of the Proclamation period as warranted.

The Board of Pharmacy will continue to monitor the situation as additional information is available and make necessary adjustments to provide pharmacy professionals with the guidance needed to navigate the current public health emergency.