



# WYOMING STATE BOARD OF PHARMACY

*newsletter to promote pharmacy and drug law compliance*

## ***Wyoming Pharmacy Act Rules and Regulations Statement of Principal Reasons for Revisions***

The Wyoming State Board of Pharmacy proposes to amend Chapters 3, 6, 16, and 18 of the Wyoming Pharmacy Act Rules and Regulations in order to modernize, reorganize, and simplify the chapters by removing obsolete and/or commonly understood terms and definitions; duplicative requirements that are already found in statute; simplify the requirements for pharmacy interns; simplify the annual continuing education (CE) requirements; make conforming changes for immunizations from emergency rules that were made in preparation for the May 11 end date for the public health emergency (PHE); and revisions that are in accordance with Wyoming Statute (W.S.) §35-4-901 et seq. and Enrolled Act No. 36, Senate 2023, SF0007.

As required by W.S. §16-3-103(a)(i)(G), these rules meet minimum substantive state statutory requirements.

### ***Chapter 3: Pharmacy Internship Regulations***

- The chapter is being modernized, reorganized, and simplified;
- Obsolete and/or commonly understood terms/definitions are being removed;
- Requirements for pharmacy interns are being simplified and modernized;
- Requirements for preceptors are being simplified and modernized; and

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- Registration requirements to administer immunizations made via emergency rule are addressed.

### ***Chapter 6: Continuing Professional Education Regulations***

- The annual CE requirement for pharmacists is proposed to be increased from 12 to 15 hours to give pharmacists more opportunities to find CE that fits their practice and continuing professional development while also completing the mandatory CE on the responsible prescribing of controlled substances (CS) pursuant to W.S. §33-24-157;
- The annual CE requirement for pharmacy technicians is proposed to be increased from six to 10 hours to align with the requirements to maintain certification through either the Pharmacy Technician Certification Board or the National Healthcareer Association; and
- To simplify the type of accepted CE that must be reported into the National Association of Boards of Pharmacy®'s (NABP®'s) free central repository, CPE Monitor®.

### ***Chapter 16: Immunization Regulations***

- Addresses the emergency rules that have been made in preparation for the May 11 end date for the PHE, which include:
  - Clarifying that pharmacy technicians need to have and maintain an active CPR certification; and
  - Previous incorporations by reference of the Centers for Disease Control and Prevention (CDC) guidelines for immunizations were immediately out of date when the CDC issued new guidelines. For example, the current guidelines that are incorporated still refer to coronavirus disease 2019 (COVID-19) vaccines that were authorized under Food and Drug Administration's emergency use authorization. In addition to the CDC guidelines, the Board required pharmacists to utilize the manufacturer's package insert for indication, contraindication, etc. The Board proposes revising and simplifying the rules to where pharmacists must utilize the manufacturer's package insert when determining if they can prescribe a vaccine to a healthy adult or minor or must refer the patient to a practitioner for a prescription if the patient has a contraindication to receiving a vaccine.

### ***Chapter 18: Prescribing by Pharmacists***

- The chapter is being simplified because many of the requirements are duplicative of what is already in W.S. §35-4-901 et seq. and to make conforming changes in accordance with W.S. §35-4-901 et seq. and Enrolled Act No. 36, Senate 2023, SF0007.

Requests for copies of the proposed revisions may be addressed to the Board executive director at 1712 Carey Avenue, Suite 200, Cheyenne, WY 82002. The proposed amended rules and new chapters

are posted on the [Wyoming Secretary of State](#) and the [Wyoming State Board of Pharmacy websites](#). Comments may be submitted to the Board by mail using the address above or to [bop@wyo.gov](mailto:bop@wyo.gov) on or before June 12, 2023, at 5 PM MDT.

## ***President Biden to End COVID-19 Emergencies on May 11***

President Joseph R. Biden informed Congress on January 31, 2023, that he will end the twin national emergencies for addressing the COVID-19 pandemic on May 11, 2023. The declarations, guidances, protections, and so forth that were authorized under the federal Public Readiness and Emergency Preparedness Act (PREP Act) will likely wind down and end on May 11 as well. Licensees are encouraged to familiarize themselves with the changes that will result when PREP Act provisions end. For example, in Wyoming, pharmacists, pharmacy interns, and pharmacy technicians who are qualified to immunize will no longer be able to administer vaccines to children as young as three years old. Wyoming Statute 33-24-157 will limit pharmacy staff authorized to immunize to individuals seven years of age and older.

## ***Revisions to the Wyoming Pharmacy Act Rules – Chapters 6, 16, and 18 Approved by Governor Gordon***

On January 4, 2023, Governor Mark Gordon approved revisions to the following chapters of the Wyoming Pharmacy Act Rules: Chapter 6: Continuing Professional Education Regulations, Chapter 16: Immunization Regulations, and Chapter 18: Prescribing by Pharmacists. The revised rules are publicly available on the Board's website at <https://pharmacyboard.wyo.gov/laws>. Licensees are encouraged to review and familiarize themselves with the revisions to the chapters. Below is a summary of the revisions that were made.

### ***Chapter 6: Continuing Professional Education Regulations***

The Board removed obsolete or commonly understood definitions. Continuing pharmacy education requirements for both pharmacists and pharmacy technicians were brought together into the chapter, simplified, and modernized. The statutory requirement for pharmacists to obtain 1.5 hours of CE on the responsible prescribing of CS was referenced in the chapter, and the Board clarified that courses on pain management/opioids will meet this requirement.

The Accreditation Council for Pharmacy Education (ACPE) has multiple topic designators to help pharmacists and pharmacy technicians identify courses that meet specific CE topic requirements. For example, for pharmacists who immunize, they need to complete one hour of CE related to immunizations (ACPE topic 06). Pharmacy technicians who wish to maintain their Pharmacy Technician Certification Board certification need to complete 20 hours of CE during each two-year recertification cycle, including one hour on pharmacy law (ACPE topic 03) and one hour on patient safety (ACPE topic 05).

Other courses may be able to meet the statutory requirement to obtain 1.5 hours of CE on the responsible prescribing of CS. From an audit perspective and for the ease of identifying eligible courses, ACPE topic 08 Pain Management/Opioids will count toward the statutory requirement.

### ***Chapter 16: Immunization Regulations***

The Board removed the separate immunization registration that pharmacists previously had to obtain in order to prescribe and administer immunizations. This ties the ability for pharmacists to prescribe and immunize to their Wyoming pharmacist license, similar to the ability to prescribe and dispense naloxone, provided that the pharmacist meets the qualifications outlined in the chapter. Qualifications are provided for pharmacy technicians to be able to administer immunizations under the supervision of a pharmacist who is also qualified to immunize.

Pharmacy technicians can administer the vaccines outlined in the CDC recommended adult immunization schedule for ages 19 years or older and the CDC's recommended child and adolescent immunization schedule for ages 18 and younger under the supervision of a pharmacist who is qualified to immunize as outlined in the chapter. These immunization schedules have been incorporated by reference, and copies can be obtained from the Board office.

All pharmacy staff members who are qualified to administer immunizations may administer epinephrine in the management of an acute allergic reaction to an immunization. Pharmacy staff who can immunize must follow the section on "Preventing and Managing Adverse Reactions" located in the Advisory Committee on Immunization Practices (ACIP) *General Best Practice Guidelines for Immunization*. A copy of ACIP's guidelines must either be posted in the private space where immunizations are administered or maintained in the emergency kit. Copies of ACIP's "Preventing and Managing Adverse Reactions" can be obtained from the Board office.

### ***Chapter 18: Prescribing by Pharmacists***

The Board created rules for pharmacists to prescribe and dispense epinephrine autoinjectors pursuant to Senate Enrolled Act No. 0037, Senate 2022, SF0101. The Board also simplified the rules for pharmacists to prescribe and dispense naloxone.

## ***WPAP Anonymous Well-Being Self-Check Questionnaire***

The Wyoming Professional Assistance Program (WPAP) is now offering a new anonymous and confidential service. The purpose of this service is to provide pharmacists, pharmacy interns, pharmacy technicians, and pharmacy technicians in training experiencing burnout, stress, depression, or other mental health concerns with a way to connect anonymously to support and services.

To get confidential feedback and support from a licensed WPAP clinician, visit [wpap.connectsyou.org](https://wpap.connectsyou.org) and complete the brief online [Self-Check Questionnaire](#). Once completed, a WPAP clinician will review your questionnaire and provide you with a personalized response. The response will include

information, recommendations, and options for next steps for connecting to support and resources, including options for mental health counseling.

Using this service is completely voluntary and anonymous. You will not have to share who you are unless you want to.

The Self-Check Questionnaire is:

- entirely anonymous, confidential, and completely voluntary;
- a safe and easy way to find out if burnout, stress, anxiety, or depression may be affecting you; and
- a free service from WPAP.

There are three easy steps:

- take and submit a brief (<10 min) questionnaire; then
- a WPAP clinician will post a personal response to you on the secure website with information, recommendations, and options for next steps; and
- you decide what is next.

You will have the option of communicating with the WPAP clinician through the website or on the phone to learn more about support offerings, or you can decide to do nothing further at that time.

WPAP has been providing professionals who are struggling with substance abuse and mental health issues with confidential assistance since 1997. This includes evaluations, intervention guidance, life coaching, treatment provider referrals, and a comprehensive monitoring program. If you have any questions about this service, please contact Executive Director Candice Cochran at 307/472-1222, ext 1, or by email at [candicec@wpapro.org](mailto:candicec@wpapro.org).

## ***Fixing Submission Errors in Wyoming PMP AWARxE/Bamboo Health PMP Clearinghouse***

Submission errors continue to occur with the Wyoming Prescription Monitoring Program (PMP). At the time of writing, over 500 prescription records with outstanding errors have not been corrected. Some of these errors go back to June 2022, when the transition to the new PMP platform occurred. In the Board's January 2023 *Newsletter*, it was mentioned that the Board is now able to more clearly see who is reporting, who is not, and who is not fixing their reporting errors. Errors must be corrected as soon as possible, and the Board has been contacting pharmacies to correct their errors.

The most common error that the Board is seeing continues to be "DEA value missing." When this occurs with drugs of concern that are not CS, it is because the practitioner does not have a Drug Enforcement Administration (DEA) number. As a reminder, the [Data Submission Dispenser Guide](#), which is available on the Board's [website](#), has a DEA number that can be used for this scenario only,

ie, the practitioner does not have a DEA number and has prescribed a drug of concern that must be reported.

If there are any errors in your data submission report, you will receive an email notification from Bamboo Health at the email address that was used to register with the Bamboo Health PMP Clearinghouse. Dispensers should be diligently checking their email for error notifications as well as successful submissions. Any file that is not corrected will not show up in a patient's profile until it is corrected. If one of your files has an error, you will get an email daily from Bamboo Health for 30 days for each error that needs to be corrected. Data submission errors must be corrected as soon as possible. If you experience issues correcting submission errors, you should open a help desk ticket with Bamboo Health, either via its telephone line or website. You can also contact Liz Wood, the Wyoming PMP AWAxE coordinator at the Board office, for help. The Board has taken disciplinary action against pharmacies/pharmacists who have not corrected submission errors in the PMP in a timely manner. Failure to correct submission errors in a timely fashion may result in disciplinary action.

## **Final Newsletter: June 2023**

The June 2023 edition of the *Wyoming State Board of Pharmacy Newsletter* will be the Board's final newsletter. Going forward, the Board will utilize electronic methods of communicating with its licensees, including posts on its website, emails to licensees, etc. The Board would like to thank NABP for its partnership in providing the newsletters and greatly appreciates the efforts that NABP has made to provide timely updates and communications along with the Board's materials.

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