



Report of the Task Force to

**ASSESS EXPANDING ACCESS
TO NABP COMPETENCE ASSESSMENT
EXAMINATIONS**

Report of the Task Force to Assess Expanding Access to NABP Competence Assessment Examinations

Members Present

Mark Hardy (ND), *chair*; Jonathan Beattie (WY); Richard Breeden (TN); Mark Bunton (IN); Mike Burleson (KY); Richard Geaney (MA); Shauna Gerwing (SK); Caroline Juran (VA); John Kirtley (AR); Cristina Medina (FL); John Weitekamp (WI).

Others Present

Kam Gandhi, *Executive Committee liaison*; Lemrey “Al” Carter, Melissa Becker, Andrew Funk, Eileen Lewalski, Neal Watson, Elizabeth Ferro, Linda Johnson, Gertrude “Gg” Levine, Maureen Schanck, *NABP staff*.

Introduction

The task force met on August 27-28, 2024, at NABP Headquarters in Mount Prospect, IL. This task force was established pursuant to Resolution 120-2-24, Task Force to Assess Expanding Access to NABP Competency Assessment Examinations, which the NABP membership passed at the 120th NABP Annual Meeting in May 2024.

Review of the Task Force Charge

Charge of the task force:

1. Examine feasible options for NABP and state boards of pharmacy to expand access to NABP competency examination administration processes, such as
 - a. Providing more testing center choices;
 - b. Enhancing communication between schools and colleges of pharmacy and NABP to alleviate delays in the posting of graduate transcripts; and
 - c. Allowing candidates to take the North American Pharmacist Licensure Examination (NAPLEX) and/or Multistate Pharmacy Jurisprudence Examination (MPJE) prior to anticipated graduation.
2. Amend, if necessary, the *Model State Pharmacy Act and Model Rules of the National Association of Boards of Pharmacy (Model Act)* accordingly.

Background and Discussion

The discussion began with a review of the task force charge and the recognition that the task force was established pursuant to Resolution 120-2-24, Task Force to Assess Expanding Access to NABP Competency Assessment Examinations, which was passed at the 120th Annual Meeting in May 2024. The resolution, which is reflected in the task force charge, is based on four premises: 1) the public relies on board of pharmacy licensees to provide critical health care services, 2) boards of pharmacy must protect the public while ensuring a safe and streamlined process for pharmacist licensure, 3) appropriate measures are vital to ensure the integrity of the competency assessment examinations used for pharmacist licensure, and 4) public policy supports scrutiny of the established licensure process to improve it safely.

Exploring the background and the reasoning behind the resolution, task force members and NABP staff recounted recent changes in testing trends and requirements. For example, in 2020, to improve exam integrity, NABP began requiring schools and colleges of pharmacy to submit official transcripts for students who apply for the NAPLEX or MPJE in order to receive their Authorization to Test (ATT). Members discussed how this requirement could delay students in scheduling their examinations. It was noted that waiting for pharmacy school registrars to send the required transcripts, especially if not transmitted via the NABP e-Profile Connect system, can introduce additional delays.

When asked about concerns over the unavailability of testing appointments, staff first explained that NABP utilizes testing services provider, Pearson VUE, to administer examinations, selecting this vendor over its competitor for its superior security measures. During the COVID-19 pandemic, in an effort to accommodate lockdown and other requirements, Pearson VUE and NABP worked together to open additional testing sites, mostly on academic campuses, to accommodate NABP candidates; however, a number of the new sites lacked the same degree of security as the primary sites. These sites are no longer in use.

Regarding other challenges, the task force noted that some jurisdictions, like South Dakota, have only one testing center and cannot accommodate all students attempting to schedule examinations during peak times immediately upon graduation. Members pointed out that competition for testing appointments is especially high when candidates must compete with other professions requiring examinations for licensure. Task force members observed that students struggle to study for and schedule appointments for both the NAPLEX and MPJE, take both exams, and begin working, all within a short period of time.

Staff reported that NABP continues to work proactively with Pearson VUE to address capacity issues. Candidates can schedule NAPLEX and MPJE examinations at over 380 Pearson VUE testing centers in the United States and its territories. They can also schedule the MPJE on select military campuses. Candidates can schedule or cancel examination appointments at any time at no charge. In addition, NABP offers best practices to candidates for scheduling and has updated the NABP website to create educational blogs and other communication tools like the *NAPLEX/MPJE Candidate Application Bulletin* in a digital, downloadable format. Staff also reported that, in general,

candidates are able to schedule testing appointments without issue unless they are seeking a specific day/time or testing center. Another factor staff noted that may impact scheduling is increased requests for special accommodations pursuant to the Americans with Disabilities Act (ADA). Some accommodations require 12-hour testing slots, which reduces the number of available testing opportunities, causing some candidates to delay testing or opt out of ADA accommodations.

The task force focused its attention primarily on the MPJE, which is required by 46 states and is taken by recent college of pharmacy graduates shortly after they receive their conferred degree, as well as by licensed pharmacists who want to practice in other jurisdictions and pharmacists who are certified by the Foreign Pharmacy Graduate Examination Committee. The task force also discussed which states do not require the MPJE, such as Arkansas, where the board of pharmacy administers and proctors its own jurisprudence examination. Students may take the Arkansas examination after completing the jurisprudence course and prior to degree conferral. Task force members also discussed recent discussions in several states about eliminating the requirement to pass the MPJE in order to lower barriers to licensure. In 2018, Idaho eliminated the requirement, and, in 2022, Vermont did so as well. It was also noted that, in Wisconsin, legislation was recently considered that would have eliminated the requirement.

Pursuant to Resolution 120-2-24, NABP launched a pilot program in July 2024 to address the aforementioned challenges. Staff explained that the pilot involves a collaboration between NABP, the boards of pharmacy, and the deans and several faculty members at the schools of pharmacy in North Dakota and Wisconsin. The pilot enables students from these schools to take their state's MPJE prior to degree conferral – after completing their didactic requirements, including the pharmacy law course, and prior to starting their advanced pharmacy practice experiences (APPEs).

Staff explained that NABP established and followed criteria to verify participation in the pilot using information provided by the schools and colleges of pharmacy. As part of the pilot, NABP must receive rosters and unofficial transcripts from the participating schools indicating the students who have taken and passed all of their didactic curriculum. Students must create an NABP e-Profile account and enter their education information to apply for eligibility to take the MPJE. NABP uses a manual process to verify and upload the temporary transcripts to each student's e-Profile account.

To streamline the process, NABP verifies and grants eligibility for students to take the exam for Wisconsin (along with 13 other jurisdictions outside the pilot). For North Dakota, NABP notifies the board of pharmacy after the education information has been verified to grant eligibility for students in that state to take the examination. Once eligibility is granted, students are notified via an auto-generated email. Students must then purchase an MPJE application, receive an ATT, and schedule the examination. After students complete the examination, results are released to the respective boards of pharmacy. Students participating in the pilot program have one opportunity to take and pass the examination prior to degree conferral. If they fail the examination, they must wait until degree conferral to repeat it. Unlike the MPJE pilot, students must still wait until degree conferral to take the NAPLEX.

Once the pilot is complete, the process will be evaluated to determine, among other things, if it addresses the challenges identified by NABP member boards.

The task force then discussed the implications of expanding the pilot program to additional jurisdictions. Some jurisdictions have laws and rules restricting examination administration prior to a conferred graduation date. Members asked how many states would have to change their laws and rules to accommodate students taking the MPJE prior to the conferred graduation date. NABP agreed to study which states have such limitations in place. The task force observed that nothing in the *Model Act* prohibits early administration of the MPJE, although the *Model Rules* may need to be changed to assist the boards of pharmacy in modifying their rules.

Task force members asked whether there is enough demand to offer the MPJE prior to APPEs to justify states' efforts to change their rules and regulations. NABP and task force members relayed that the idea for the pilot program was met with enthusiasm in several states because, along with creating more testing opportunities and alleviating testing bottlenecks, allowing candidates to take one examination at a time could increase pass rates.

To facilitate expanding the pilot program, the task force recommended that NABP work with the Accreditation Council for Pharmacy Education (ACPE) and the American Association of Colleges of Pharmacy (AACP) so that students are able to take the MPJE earlier in the curriculum. Further, the task force recommended that NABP continue working with schools and colleges of pharmacy to expedite the transcript submission process. The task force also suggested that schools and colleges of pharmacy should require students to create an e-Profile account as part of onboarding new students.

Staff noted that if the decision is made to expand the pilot program, the earliest the expansion could occur is mid-2025. The task force acknowledged that, in 2026, NABP will introduce the uniform MPJE¹, which will open additional examination scheduling opportunities.

The task force also considered whether administering the examination early compromises security in any way. It was noted that while security is always an issue, early administration does not introduce additional concerns because testing attempts are limited.

The task force also deliberated whether allowing early administration of the MPJE would create additional burdens for the boards of pharmacy. Members noted that having NABP verify and grant eligibility (as the Association currently does for 14 jurisdictions) would lessen the burden for the boards but would result in additional fees for the students for eligibility review. Eligibility review is valid for one year and may include the NAPLEX eligibility review if the student is applying up to six months in advance of the testing date.

¹ At the time of the meeting, the uniform MPJE was being referred to as the Uniform Pharmacy Jurisprudence Exam (UPJE).

The task force encouraged NABP to continue working with Pearson VUE in the meantime to improve candidates' ability to schedule appointments to take the examination. Staff reiterated its ongoing efforts to ensure adequate testing sites and to allow expedited testing in some situations. The task force and staff acknowledged that there is additional demand for testing appointments in May, June, and July and that there may always be higher-than-average competition for appointments to test during this time.

Staff noted that the use of NABP's Managed Student Transcript (MST) system within the NABP e-Profile Connect system by schools and colleges of pharmacy to upload transcripts is more efficient, quicker, and requires fewer resources than submitting the transcripts via email or US Postal Service. Approximately 91 schools are using MST in 2024. This number varies from year to year based on whether schools can receive transcripts from the registrar's office in a timely manner. The task force suggested that NABP require schools to use the MST to help streamline the examination eligibility application process.

Recommendations

After careful review and deliberation, the task force made the following recommendations:

1. NABP should require schools and colleges of pharmacy to use NABP's MST system to upload transcripts.
2. NABP should evaluate working with ACPE and AACP to allow students to take the MPJE or uniform MPJE, if allowed by the state, after successfully completing the jurisprudence class and prior to or during APPEs.
3. NABP should continue collaborating with schools and colleges of pharmacy to expedite the examination eligibility application process before degree conferral.
4. NABP should encourage the boards of pharmacy to review their statutes/laws and rules/regulations to evaluate whether they allow students to take the MPJE or uniform MPJE prior to degree conferral.
5. NABP should continue working with the current test center vendor to improve candidates' ability to secure testing appointments.
6. NABP should amend the *Model Act* as denoted by underlines in the following excerpt.

National Association of Boards of Pharmacy Model State Pharmacy Act

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Article III Licensing

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Section 302. Qualifications for Pharmacist Licensure by Examination.

- (1) To obtain a license to engage in the practice of pharmacy, an applicant for licensure by examination shall:
 - (a) have submitted an application in the form prescribed by the board of pharmacy;
 - (b) have attained the age of 18 years;
 - (c) have graduated and received the first professional degree from a college or school of pharmacy that has been approved by the board of pharmacy;² or have graduated from a foreign college of pharmacy,³ completed a transcript verification program, taken and passed a college of pharmacy equivalency examination program, and completed a process of communication-ability testing as defined under board of pharmacy regulations so that it is ensured that the applicant meets standards necessary to protect public health and safety;⁴
 - (d) have completed a pharmacy practice experience program or other program that has been approved by the board of pharmacy, or demonstrated to the board's

² It is contemplated that boards will approve those programs whose standards are at least equivalent to the ACPE Standards of Accreditation for Doctor of Pharmacy Degree Programs. This would include college-structured pharmacy practice experience programs and continuing education programs. See the footnote to Section 213(1)(d) above for further discussion of the board's proper role in the accreditation process.

³ Graduates of a professional pharmacy degree program based outside the US and its territories that have been awarded Precertification, Provisional Certification, or Certification by ACPE are not eligible for US pharmacy licensing exams (NAPLEX or MPJE) and must complete the Foreign Pharmacy Graduate Examination Committee (FPGEC) program to be eligible to take the pharmacy licensing exams in the US. Similarly, graduates from an ACPE-accredited post-baccalaureate pharmacy program where the initial pharmacy degree is from a pharmacy program that is not an entry-level, ACPE-accredited pharmacy program, must complete the FPGEC program. [NOTE: ACPE will be changing the terminology that will be used within the ACPE International Services Program. As of January 1, 2023, the ACPE International Services Program will offer "International-Accreditation," "International Pre-Accreditation," and "Provisional International-Accreditation" to qualifying pharmacy degree programs outside the United States of America and its Territories. These will replace ACPE's current "Certification," "Precertification" and "Provisional Certification" statuses.]

⁴ Boards should avoid mention of specific examinations or other contracted services in their practice act and regulations to avoid challenges related to an unconstitutional delegation of authority. It is contemplated that boards will utilize the Foreign Pharmacy Graduate Equivalency Examination[®] (FPGEE[®]) as part of their assessment of pharmacy education equivalence.

- satisfaction that experience in the practice of pharmacy which meets or exceeds the minimum pharmacy practice experience requirements of the board;
- (e) have successfully passed an examination or examinations approved by the board of pharmacy within five attempts;
 - (f) have undergone a state and federal fingerprint-based criminal background check as specified by state law or board rule; and
 - (g) have paid the fees specified by the board of pharmacy for the examination and any related materials and have paid for the issuance of the license.
- (2) Examinations.
- (a) The examinations for licensure, which include a pharmacy practice examination and a jurisprudence examination, required under Section 302(1)(e) of the Act, shall be provided by a testing provider approved by the board.⁵ if applicable, state-specific compounding examinations shall be administered by the board. The content and subject matter of the pharmacy practice examination shall be determined by the examination provider approved by the board and the board shall determine the content and subject matter of each state-specific compounding and jurisprudence examination.
 - (b) The examinations shall be prepared to measure the competence of the applicant to engage in the practice of pharmacy. The examination provider may employ, cooperate, and contract with any organization or consultant in the preparation and grading of an examination, but the board shall retain the sole discretion and responsibility for determining which applicants are eligible for licensure.

Section 303. Pharmacy Practice Experience Program Standards; Pharmacy Intern Licensure.

- 1) The board of pharmacy shall establish standards for pharmacy practice experience programs for the purpose of providing the practice experience necessary for licensure as a pharmacist.
- 2) The board shall grant a pharmacy intern license to pharmacy students, authorizing those students to engage in the practice of pharmacy under the supervision of a pharmacist.
- 3) The board of pharmacy shall adopt rules regarding the licensure of pharmacy interns and the standards for pharmacy practice experience programs.⁶

⁵ Boards of Pharmacy are strongly encouraged to utilize the North American Pharmacist Licensure Examination (NAPLEX) and the Multistate Pharmacy Jurisprudence Examination (MPJE) for this purpose.

⁶ Boards of pharmacy are strongly encouraged to utilize the ACPE Standards of Accreditation for Doctor of Pharmacy Degree Programs as a basis for establishment and revision of board standards for pharmacy practice experiences. These Standards of Accreditation also contain additional guidance on the desired behaviors, qualities, and values of preceptors.

- a) All applicants for licensure by examination shall obtain practical experience in the practice of pharmacy concurrent with or after college attendance, or both, under such terms and conditions as the board shall determine.⁷
- b) The board shall establish such licensure requirements for pharmacy interns, including obtaining an NABP e-Profile ID, and standards for pharmacy practice experiences, or any other experiential program necessary to qualify an applicant for the licensure examination and shall also determine the qualifications of preceptors used in practical experience programs.⁸

⁷ Although boards of pharmacy mandate a specified number of hours of pharmacy practice experiences as a prerequisite to licensure, boards of pharmacy are also encouraged to deem those requirements met if boards find that the college-based pharmacy practice experiences meet or exceed the hourly pharmacy practice experience requirements.

As indicated in the Model Rules for Pharmacy Interns, applicants for licensure as pharmacists shall submit evidence that they have satisfactorily completed: (1) an objective assessment mechanism intended to evaluate achievement of desired competencies as delineated in the ACPE Standards of Accreditation for Doctor of Pharmacy Degree Programs and (2) not less than 1,740 hours of pharmacy practice experience credit under the instruction and supervision of a preceptor. Boards may consider moving away from requiring a specific number of contact hours should it be determined that the ACPE Standards of Accreditation for Doctor of Pharmacy Degree Programs result in appropriate preparation for students and objective assessment mechanisms demonstrate such.

⁸ Boards of pharmacy are strongly encouraged to utilize the ACPE Standards of Accreditation for Doctor of Pharmacy Degree Programs as a basis for establishment and revision of board standards for pharmacy practice experiences. These Standards of Accreditation also contain additional guidance on the desired behaviors, qualities, and values of preceptors.