

ARIZONA STATE BOARD OF PHARMACY

*Newsletter to Promote Pharmacy
and Drug Law Compliance.*

Update Your Profile

In pursuing more effective communication with its licensees and permittees, the Arizona State Board of Pharmacy has noticed that contact information in its system is not always current and up to date. You are required to update your personal contact

information and pharmacy employer within 10 days of a change, pursuant to Arizona Revised Statutes §32-1926. Please use your online profile to update your contact information by [clicking here](#).

Be on Alert – Scam Letters and/or Phone Calls

Warning: Scammers are using letters, in addition to phone calls, to scam licensees. **The Board has recently experienced an increase in the number of reports from licensees who are receiving scam calls.**

In one past incident, the imposter called the pharmacist's mobile phone using a caller ID that matched the Board's phone number. The caller claimed to be a Board investigator and threatened the pharmacist, asserting that the phone was tapped and that emails

were being monitored by the Board. The caller was intimidating and manipulative and connected the pharmacist with another caller who pretended to be a Federal Bureau of Investigation (FBI) agent.

The pharmacist was sent a letter that claimed to be an official notice of suspension. This letter had a Board letterhead, State of Arizona Board of Pharmacy seal, the licensee number, and appeared to have been signed **by the Board's executive director**.

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(cont)

Fortunately, this licensee contacted the Board and confirmed that they were in good standing and not part of any investigation. The licensee also provided the information contained in this alert so that the Board could notify other licensees about this imposter and scam.

Techniques used by fake callers include the following:

- A caller uses a caller ID that shows “AZ State Board of Pharmacy” with the Board’s phone number, 602/771-2727.
- The caller claims that a licensee is under investigation by the Board, Drug Enforcement Administration (DEA), FBI, or another government agency. In some cases, the caller also warns of discipline unless the licensee pays a “fine” over the phone.

- A caller warns a licensee not to report the call to anyone “or else [they] will jeopardize the investigation.”
- A caller requests a licensee’s mobile phone number.
- A caller gives a fake call-back number.

These calls are scams!

In many cases, callers are attempting to extort money or elicit sensitive, non-public information – bank account information, personal addresses, DEA registration numbers, etc – from licensees.

What can you do to protect yourself and your pharmacy?

Licensee security is important to the Board. Be aware of these tips:

- **If you have any doubts or questions about someone**

claiming, by phone or in person, to represent the Arizona State Board of Pharmacy, call the Board at 602/771-2727.

- If a scam caller claims to represent DEA or FBI, report the call to [DEA’s Extortion Scam reporting program](#) or [FBI’s Internet Crime Complaint Center](#).
- If a scam caller’s phone number appears to be the Board’s telephone number, report the scam using the [Federal Communications Commission’s consumer complaint form](#).

Welcome Our New Board Member



Allan Lenefsky is an Arizona attorney, former administrative law judge, educator, mediator, and longtime public servant

with more than four decades of experience in law, administrative adjudication, public-sector legal practice, dispute resolution, and

civic leadership. He served nearly 20 years as an administrative law judge II with the California Department of Social Services and previously served as a deputy county counsel IV in Imperial County, California.

His professional experience includes administrative law, employment and labor matters, public contracting, regulatory compliance, mediation, and legal education. His civic service has

included chairing a municipal planning commission and a crime and substance abuse prevention commission, as well as leadership roles in major community organizations in Arizona. He brings extensive experience in public decision making, regulatory matters, and organizational leadership to his service as a public member of the Board.



Arizona Updates Pharmacy Prescription Transfer Rules

Arizona pharmacies have new requirements governing prescription transfers. In a final rulemaking published in the July 24, 2026 *Arizona Administrative Register*, the Board amended **Arizona Administrative Code (AAC) R4-23-407(E)** to better align state requirements with federal law. The transfer amendments became effective on **July 7, 2026**.

The Board expressed the changes are intended to reduce inconsistencies between state and federal requirements and make prescription transfers more workable for pharmacies and patients.

Patient-Initiated Transfers

A pharmacist may initiate a prescription transfer only when requested by the patient or the patient's representative.

For **non-controlled prescriptions**, a pharmacist may delegate the transfer to an intern or pharmacy technician. Transfers involving **controlled substances (CS)**, however, may not be delegated and must be handled by a pharmacist.

Record-Keeping Requirements

For transfers between Arizona pharmacies, both the transferring and receiving pharmacies must retain the required prescription information for **seven years from the date the pharmacy last dispensed the prescription**.

Records must identify the prescription, the transferring and receiving pharmacies, the transfer date, the person who completed the transfer, and the prescription's status after transfer.

When a prescription is transferred electronically, the transferring pharmacy's computer system must cancel the prescription when appropriate, while the receiving pharmacy must document receipt of the transferred information.

Controlled and Non-Controlled Prescriptions

CS transfers must comply with both Arizona requirements and applicable federal law. The amended rule addresses transfers of Schedule II through V prescriptions and requires pharmacies to observe federal restrictions governing those transfers.

For non-controlled prescriptions, transfers may occur before or after the prescription is initially filled. Only the remaining refills originally authorized may be transferred, and the receiving pharmacy must ensure that the total number of refills dispensed does not exceed the prescriber's authorization.

Non-controlled prescriptions may be transferred by any lawful method that protects the integrity, confidentiality, and traceability of the prescription information.

What Pharmacies Should Review

Arizona pharmacies should review their policies, employee responsibilities, computer system settings, and record-keeping procedures. Staff should clearly understand which transfers may be completed by technicians or interns and which must remain with the pharmacist.

Both the transferring and receiving pharmacies are independently responsible for complying with the rule, making accurate documentation essential on both sides of the transaction.

Arizona Modernizes Pharmacy Compounding Rules

Arizona is updating its pharmacy compounding standards through amendments to **AAC R4-23-410** and **AAC R4-23-670**. Published in the July 24, 2026 *Arizona Administrative Register*, the new requirements became effective on **September 5, 2026**.

The changes bring Arizona's rules more closely in line with current federal requirements and United States Pharmacopeia (USP) standards covering nonsterile compounding, sterile compounding, hazardous drugs, and radiopharmaceutical preparations.

USP and Federal Standards

Pharmacies engaged in compounding must operate in a Board-permitted facility and comply with applicable state and federal law.

For traditional **503A pharmacies**, the rule incorporates USP Chapters **<795>**, **<797>**, **<800>**, and **<825>**. Outsourcing facilities operating under **503B** remain subject to the applicable federal current Good Manufacturing Practice requirements.

Ingredients and Anticipatory Compounding

Compounding ingredients must meet applicable quality requirements. Bulk drug substances must come from

appropriate sources and generally require supporting documentation, including a valid certificate of analysis.

Arizona continues to allow anticipatory compounding when a pharmacist reasonably expects to receive a patient-specific prescription based on past experience. Products must be properly labeled and stored until dispensed.

Copies of Commercially Available Drugs

A pharmacy generally may not compound an essential copy of a Food and Drug Administration-approved, commercially available drug unless the prescriber determines that a clinically significant difference is necessary for a specific patient.

An exception may also apply when the commercial drug appears on a recognized drug shortage list.

These provisions are especially important for pharmacies using electronic prescribing or pharmacy platforms. Patient-specific clinical information must support prescriptions for compounded copies of commercially available products.

Hazardous Drugs and Documentation

Each pharmacy must develop a facility-specific hazardous drug list

and evaluate its handling practices using applicable National Institute for Occupational Safety and Health and USP <800> standards. Depending on the drug, pharmacies may need documented risk assessments covering exposure risks, engineering controls, personal protective equipment, cleaning, and spill procedures.

Compounding records, training documents, certificates of analysis, quality records, environmental monitoring, and related documentation must generally be retained for **seven years**. Required records must also be available to the Board within **three business days of a request**.

Sterile Compounding

The amended rules also update sterile compounding requirements involving facility design, environmental controls, restricted access, cleaning, microbial monitoring, employee training, and ISO Class 5 environments.

Arizona compounding pharmacies should review their policies, facilities, training programs, supplier records, hazardous drug procedures, and documentation systems.

Disciplinary Actions and Updates – Health Boards

Disciplinary actions for the Arizona State Board of Pharmacy can be found [here](#).

Disciplinary actions for the Arizona Medical Board can be found [here](#).

Disciplinary actions for the Arizona Osteopathic Board can be found [here](#).

Disciplinary actions for the Arizona State Board of Dental Examiners can be found [here](#).

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