

## Therapeutic Research Center

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Ben Kesner, RPh, Executive Director  
New Mexico Board of Pharmacy  
5500 San Antonio Drive NE, Suite C  
Albuquerque, NM 87109

January 8, 2016

Dear Mr. Kesner,

*Pharmacist's Letter* is a highly-respected, Accreditation Council for Pharmacy Education (ACPE)-accredited provider with a national presence. It is a subscription-only product and accepts no pharmaceutical advertising. As New Mexico Administrative Code is currently written, *Pharmacist's Letter* and many other ACPE-accredited providers are unable to offer quality training and continuing education to New Mexico-licensed pharmacists seeking or maintaining prescriptive authority.

I respectfully request changes to a number of New Mexico Administrative Codes regarding training and continuing education requirements for pharmacists with prescriptive authority in New Mexico.

NMAC 16.19.26.9 (Vaccines), NMAC 16.19.26.10 (Emergency Contraception Drug Therapy), NMAC 16.19.26.11 (Tobacco Cessation Drug Therapy), and NMAC 16.19.26.13 (Naloxone for Opioid Overdose) state that initial training must be accredited by Accreditation Council for Pharmacy Education (ACPE) and provided by at least one of the following, depending on the rule: Centers for Disease Control and Prevention, Department of Health, Planned Parenthood, Health and Human Services, New Mexico Pharmacist's Association, and/or a similar health authority or professional body approved by the board.

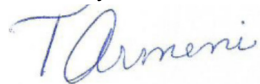
As written, this precludes ACPE-accredited providers such as *Pharmacist's Letter* from providing this initial training to pharmacists practicing in your state. I am requesting that these provider limitations be removed. This would give any ACPE-accredited provider an opportunity to offer training as long as the requirements for course content, as stated in the applicable New Mexico Administrative Code, are met.

NMAC 16.19.26.9 (Vaccines) and NMAC 16.19.26.13 (Naloxone for Opioid Overdose) continuing education requirements state that courses must be live. This requirement is potentially onerous to pharmacists practicing in New Mexico. Pharmacists who are not able to attend a live continuing education course would not be able to continue to have prescriptive authority for vaccines or naloxone. This could potentially be deadly to patients who are part of the opioid abuse epidemic spreading the country, and particularly in New Mexico. Currently, New Mexico is the only state requiring live ongoing continuing education in these areas.

I am requesting that the live requirement be removed from these continuing education requirements. Rather, any format of continuing education course from an ACPE-accredited provider would be acceptable, provided that the continuing education course meets the course content requirements as specified in New Mexico Administrative Code.

Thank you for considering these proposed changes.

Sincerely,



Tammie J. Armeni, RPh, PharmD  
Director of Continuing Education