



NASP

NATIONAL
ASSOCIATION
OF SPECIALTY
PHARMACY

RECEIVED
APR 22 2026
**California State
Board of Pharmacy**

April 22, 2026

California State Board of Pharmacy
2720 Gateway Oaks Drive, Suite 100
Sacramento, CA 95833

Dear Members of the California State Board of Pharmacy,

On behalf of the National Association of Specialty Pharmacy (NASP), we are writing regarding the implementation of Assembly Bill 1503, which requires that, effective July 1, 2026, nonresident pharmacies dispensing into California have a pharmacist-in-charge (PIC) licensed in California.

Specialty pharmacies play a distinct and critical role in the healthcare system, focusing on the dispensing and management of high-cost, clinically complex medications used to treat patients with serious and often life-threatening conditions, including cancer, multiple sclerosis, organ transplantation, rare diseases, HIV/AIDS, and cystic fibrosis. These therapies require specialized handling, patient education, and ongoing clinical support to ensure adherence and optimal outcomes. Specialty pharmacies are accredited entities that meet rigorous standards to dispense and manage these medications, many of which are not available at all pharmacies due to manufacturer and clinical program requirements. As a result, policies that affect nonresident pharmacy operations can have a disproportionate impact on patient access to these essential therapies.

NASP supports the Board's commitment to ensuring appropriate oversight of pharmacies serving California patients and recognizes the importance of pharmacist licensure in maintaining high standards of care. However, we are concerned that the current implementation timeline may create unintended barriers to patient access, particularly given the practical constraints associated with the California pharmacist licensure process.

Multiple NASP member organizations have reported that this is not an isolated issue, but rather a broader systemic challenge. NASP members report that the California pharmacist licensure exam is offered only once per month and includes mandatory waiting periods between attempts. As a result, even when pharmacists actively pursue licensure, the timing between exam administration, score reporting, and eligibility to retest significantly limits the number of opportunities to achieve licensure prior to the July 1 deadline. This challenge is compounded by the requirement to pass a California-specific examination, which differs from the nationally standardized MPJE used in most other states. Taken together, these factors create a situation in which pharmacies acting in good faith may still be unable to meet the compliance deadline due to structural limitations in the licensure process.

Page 1 of 2



NASP

NATIONAL
ASSOCIATION
OF SPECIALTY
PHARMACY

This issue is especially concerning for pharmacies that serve vulnerable patient populations, including manufacturer-supported programs that provide medications at no cost to patients who otherwise cannot afford treatment. In many cases, these programs represent the only viable source of therapy. If affected pharmacies cannot meet the licensure requirement in time, patients may face delays, disruptions in care, or lose access altogether, with the possibility that no alternative providers are available to fill the gap.

NASP is not requesting a waiver of the licensure requirement. Rather, we respectfully request that the Board consider implementing a grace period for pharmacies that can demonstrate good-faith efforts to comply with the requirement, such as active registration for the CPJE including allowing sufficient time to sit for the exam and, if necessary, retake the exam. Providing some compliance flexibility when operational constraints prevent pharmacies from obtaining licensure on time would help preserve patient access while maintaining the intent of the law.

We appreciate the Board's consideration of this matter, particularly in advance of its upcoming Legislation and Regulation Committee meeting on April 29, 2026, and would welcome the opportunity to provide additional information or discuss potential solutions that support both regulatory objectives and patient access. If there are any questions or concerns, please do not hesitate to reach out to Sheila.Arquette@NASPnet.org.

Sincerely,

Sheila M. Arquette, RPh
President & CEO
National Association of Specialty Pharmacy