



Louisiana Board of Pharmacy

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July 9, 2015

Senator John A Alario, Jr, President
Louisiana Senate
PO Box 94183
Baton Rouge, LA 70804-9183

Via Email: APA.SenatePresident@legis.la.gov

Electronic Mail – Delivery Receipt Requested

Re: Report No. 1 of 3 for Regulatory Project 2015-7 ~ Remote Processor Permit

Dear Senator Alario:

The Board has initiated the rulemaking process to amend the Board's rules to develop a new type of pharmacy permit that will allow the pharmacy to offer clinical services to the exclusion of dispensing prescription drugs. In connection with this regulatory project, you should find the following documents in this packet:

- Notice of Intent
- Proposed Rule
- Family Impact Statement
- Poverty Impact Statement
- Provider Impact Statement
- Regulatory Flexibility Analysis
- Solicitation of Comments
- Fiscal & Economic Impact Statement

As indicated in the solicitation, we will convene a public hearing on August 26, 2015 to receive public comments and testimony on this proposal. We will summarize those comments and our responses thereto in our next report to you. In the event you have any questions or need additional information, please contact me directly at mbroussard@pharmacy.la.gov or 225.925.6481.

For the Board:

Malcolm J Broussard
Executive Director

cc: Chair, Senate Health & Welfare Committee
Via Email: APA.S-H&W@legis.la.gov
Speaker, House of Representatives
Via Email: APA.HouseSpeaker@legis.la.gov
Chair, House Health & Welfare Committee
Via Email: APA.H-HW@legis.la.gov
Director, Community Outreach Services, La. Economic Development
Via Email: Pat.Witty@la.gov
Editor, *Louisiana Register*
Via Email: Reg.Submission@la.gov
Reference File

Notice of Intent

**Department of Health and Hospitals
Board of Pharmacy**

Remote Processor Permit (LAC 46:LIII.2431 *et seq.*)

In accordance with the provisions of the Administrative Procedure Act (La. R.S. 49:950 *et seq.*) and the Pharmacy Practice Act (La. R.S. 37:1161 *et seq.*), the Louisiana Board of Pharmacy hereby gives notice of its intent to amend *Chapter 24 – Limited Service Providers* of its rules by drafting a new *Subchapter D – Remote Processor Pharmacy*, to create a new classification of pharmacy permit that will enable the establishment of remote processor pharmacy sites within the state.

Louisiana Administrative Code

Title 46 – Professional and Occupational Standards

Part LIII: Pharmacists

Chapter 11. Pharmacies

...

Subchapter D. Off-Site Services

...

§1143. Remote Processing of Medical Orders or Prescription Drug Orders

A. – A.2.a. ...

- b. ~~In the event the pharmacy providing the remote processing services performs such services for a hospital pharmacy, the performance of all such services shall be limited to licensed pharmacists-[Repealed].~~

B. – C.2.c. ...

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1182.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Pharmacy, LR 33:1132 (June 2007), amended LR 38:1240 (May 2012), amended LR 39:313 (February 2013), amended LR

...

Chapter 24. Limited Service Providers

...

Subchapter D. Remote Processor Pharmacy

§2431. Purpose

- A. The purpose of this Subchapter is to establish standards for the operation and regulation of remote processor pharmacies to be located within the state of Louisiana.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1182.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Pharmacy, LR

§2433. Definitions

- A. As used in this Subchapter, the following terms shall have the meaning ascribed to them in this Section:
 - On-Site Pharmacy – a permitted pharmacy which utilizes remote processing services from a remote processor pharmacy.
 - Remote Processing Services – the processing of a medical order or prescription drug order by one permitted pharmacy on behalf of another permitted pharmacy, including:
 - a. Receipt, interpretation, or clarification of an order;
 - b. Data entry and information transfer;
 - c. Interpretation of clinical data;
 - d. Performance of drug utilization review; and
 - e. Provision of drug information concerning a patient's drug therapy; provided, however, that remote processing does not include the physical preparation or physical transfer of drugs.
 - Remote Processor – a pharmacy holding a remote processor pharmacy permit and provides remote processing services for another permitted pharmacy.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1182.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Pharmacy, LR

§2435. General Requirements

A. Authority and Limitations

1. A remote processor pharmacy permit shall authorize the permit holder to engage in remote processing services.
2. A remote processor pharmacy permit shall not authorize the procurement or possession of any prescription medications or any controlled substances.
3. The holder of a remote processor pharmacy permit shall not be eligible to acquire a Louisiana Controlled Dangerous Substance license or a federal registration from the U.S. Drug Enforcement Administration.

B. Licensing Procedure

1. A person or other entity intending to operate a remote processor pharmacy shall complete the application form supplied by the board, and then submit it with any required attachments and the application fee to the board.
2. The board shall not process applications received by facsimile, or that are incomplete, or submitted with the incorrect fee.
3. A person or other entity who submits a false or fraudulent application shall be deemed to have violated R.S. 37:1241(A)(2) and shall be subject to disciplinary action by the board.
4. If determined appropriate by the board, the applicant may be required to meet with a committee of the board or an agent of the board prior to the issuance of the permit.
5. Regardless of the date issued, the pharmacy permit shall expire on December 31 of every year. No person or other entity may operate a remote processor pharmacy with an expired permit; the continued operation of a remote processor pharmacy with an expired permit shall substantiate a violation of R.S. 37:1241(A)(12)

C. Maintenance of Permit

1. A remote processor pharmacy permit shall be valid only for the person or other entity to whom it is issued, and it shall not be subject to sale, assignment or other transfer, voluntary or involuntary, nor shall the permit be valid for any premises other than the physical location for which it was issued.
2. A duplicate or replacement permit shall be issued upon the written request of the permit holder and payment of the required fee. A duplicate or replacement permit shall be marked as such, and it shall not serve or be used as an additional or second permit.

D. Closure of Permit

1. When the owner of the permit intends to close the remote processor pharmacy permanently, the owner's managing officer and the pharmacist-in-charge shall be accountable to the board for the proper closure of the pharmacy in compliance with Section 1133 of the board's rules.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1182.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Pharmacy, LR

§2437. Standards of Practice

A. Environmental Standards

1. The remote processor pharmacy shall be of sufficient size and shall contain sufficient fixtures, equipment, and supplies commensurate with the nature and scope of practice for that pharmacy.
2. The pharmacy shall be well-lighted, well ventilated and in compliance with the Louisiana Sanitary Code.
3. The pharmacy shall be secured by either a physical barrier with suitable locks and/or an electronic barrier to detect entry by any unauthorized personnel.
4. Prescription and other patient healthcare information shall be maintained in a manner that protects the integrity and confidentiality of such information.

B. Staffing Requirements

1. The pharmacist-in-charge shall be a Louisiana-licensed pharmacist who is accountable to the board for compliance with the provisions of Section 1105 of the board's rules.
2. The pharmacist-in-charge shall assemble and manage a staff of appropriately-credentialed people as necessary to perform its work in a safe manner.
3. For those pharmacies using pharmacy interns, pharmacy technicians, and pharmacy technician candidates, the staffing ratios cited in the board's rules are applicable to those types of personnel.

C. Operations

1. The remote processor pharmacy shall comply with the provisions of Section 1143 of the board's rules.
2. The remote processor shall comply with the recordkeeping provisions of Section 1123 of the board's rules.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1182.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Pharmacy, LR

§2438 – 2440. [Reserved]

FAMILY IMPACT STATEMENT
FOR ADMINISTRATIVE RULES

In accordance with Section 953 of Title 49 of the Louisiana Revised Statutes, there is hereby submitted a family impact statement on the rule proposed for adoption, repeal, or amendment. The following statements will be published in the Louisiana Register with the proposed agency rule.

I. The effect on the stability of the family.

We anticipate no effect on the stability of the family.

II. The effect on the authority and rights of parents regarding the education and supervision of their children.

We anticipate no effect on the authority and rights of parents regarding the education and supervision of their children.

III. The effect on the functioning of the family.

We anticipate no effect on the functioning of the family.

IV. The effect on family earnings and family budget.

We anticipate no effect on family earnings and the family budget.

V. The effect on the behavior and personal responsibility of children.

We anticipate no effect on the behavior and personal responsibility of children.

VI. The ability of the family or a local government to perform the function as contained in the proposed rule.

We anticipate no effect on the ability of the family or a local government to perform the activity as contained in the proposed rule.

POVERTY IMPACT STATEMENT
FOR ADMINISTRATIVE RULES

In accordance with Section 973 of Title 49 of the Louisiana Revised Statutes, there is hereby submitted a poverty impact statement on the rule proposed for adoption, repeal, or amendment.

I. The effect on household income, assets, and financial security.

We anticipate no impact on household income, assets, and financial security.

II. The effect on early childhood development and preschool through postsecondary education development.

We anticipate no impact early childhood development or preschool through postsecondary education development.

III. The effect on employment and workforce development.

We anticipate no positive impact on employment and workforce development.

IV. The effect on taxes and tax credits.

We anticipate no impact on taxes or tax credits.

V. The effect on child and dependent care, housing, health care, nutrition, transportation, and utilities assistance.

We anticipate no effect on child and dependent care, housing, health care, nutrition, transportation, or utilities assistance.

PROVIDER IMPACT STATEMENT
FOR ADMINISTRATIVE RULES

In accordance with House Concurrent Resolution No. 170 of the Regular Session of the 2014 Legislature, there is hereby submitted a provider impact statement on the rule proposed for adoption, repeal, or amendment. This will certify the agency has considered, without limitation, the following effects on the providers of services to individuals with developmental disabilities:

I. The effect on the staffing level requirements or qualifications required to provide the same level of service.

We anticipate no effect on the staffing level requirements or the qualifications for that staff to provide the same level of service.

II. The total direct and indirect effect on the cost to the provider to provide the same level of service.

We anticipate minimal costs to the provider to implement the requirements of the proposed rule.

III. The overall effect on the ability of the provider to provide the same level of service.

We anticipate no effect on the ability of the provider to provide the same level of service.

REGULATORY FLEXIBILITY ANALYSIS
FOR ADMINISTRATIVE RULES

In accordance with Section 965 of Title 49 of the Louisiana Revised Statutes, there is hereby submitted a regulatory flexibility analysis on the rule proposed for adoption, repeal, or amendment. This will certify the agency has considered, without limitation, each of the following methods of reducing the impact of the proposed rule on small businesses:

I. The establishment of less stringent compliance or reporting requirements for small businesses.

The proposed rule does not exempt small businesses from compliance with any of the requirements.

II. The establishment of less stringent schedules or deadlines for compliance or reporting requirements for small businesses.

There are no reporting deadlines in the proposed rule.

III. The consolidation or simplification of compliance or reporting requirements for small businesses.

There are no reporting requirements in the proposed rule.

IV. The establishment of performance standards for small businesses to replace design or operational standards required in the proposed rule.

The proposed rule identifies the operational standards for the remote processor pharmacy site, but there is flexibility in how the small business achieves compliance with those standards.

V. The exemption of small businesses from all or any part of the requirements contained in the proposed rule.

There are no exemptions for small businesses.

Interested persons may submit written comments to Malcolm J Broussard, Executive Director, Louisiana Board of Pharmacy, 3388 Brentwood Drive, Baton Rouge, Louisiana 70809-1700. He is responsible for responding to inquiries regarding this proposed rule. A public hearing on this proposed rule is scheduled for Tuesday, August 26, 2015 at 9:00 a.m. in the Board office. At that time, all interested persons will be afforded an opportunity to submit data, views, or arguments, either orally or in writing. The deadline for the receipt of all comments is 12:00 noon that same day.

Malcolm J Broussard
Executive Director
Louisiana Board of Pharmacy

FISCAL AND ECONOMIC IMPACT STATEMENT
FOR ADMINISTRATIVE RULES

In accordance with Section 953 of Title 49 of the Louisiana Revised Statutes, there is hereby submitted a fiscal and economic impact statement on the rule proposed for adoption, repeal or amendment:

I. ESTIMATED IMPLEMENTATION COSTS (SAVINGS) TO STATE OR LOCAL GOVERNMENTAL UNITS
(Summary)

The proposed rule will result in a cost of approximately \$2,000 for printing costs of the proposed and final rules in FY 16. The proposed rule will create a new classification of limited services pharmacy permit, for the purpose of enabling the establishment of remote processor pharmacy sites.

II. ESTIMATED EFFECT ON REVENUE COLLECTIONS OF STATE OR LOCAL GOVERNMENTAL UNITS
(Summary)

The proposed rule may result in an indeterminable increase in fees and self-generated revenues to the Board of Pharmacy. The cost of a new pharmacy permit is set at \$150 by statute while a renewal permit is set at \$125. The Board of Pharmacy does not anticipate issuing a large number of permits.

III. ESTIMATED COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS OR NON-GOVERNMENTAL GROUPS (Summary)

The proposed rule will create a new classification of pharmacy permit known as remote processor pharmacy sites. This type of pharmacy permit will not be authorized to procure or possess drugs for dispensing to patients, but they will be authorized to provide clinical services for other pharmacies, specifically the remote processing of medical orders or prescriptions for other pharmacies. The cost to establish and operate this type of pharmacy will be substantially less than the cost to operate a basic community pharmacy due to the absence of drug costs; however, there could be significant technology or communication costs.

IV. ESTIMATED EFFECT ON COMPETITION AND EMPLOYMENT (Summary)

The proposed rule will enable the establishment of remote processor pharmacy sites within the state which has the potential to facilitate competition with such sites located in other states as well as the potential for a positive effect on employment.

FISCAL AND ECONOMIC IMPACT STATEMENT
FOR ADMINISTRATIVE RULES

Person Preparing Statement: **Malcolm J. Broussard** Dept.: **Health and Hospitals**
Executive Director
Phone: **(225) 925-6481** Office: **Board of Pharmacy**
Return Address: **3388 Brentwood Drive** Title: **Remote Processor Permit**
Baton Rouge, LA 70809 Effective Date of Rule: **October 20, 2015 (est.)**

SUMMARY
(Use complete sentences)

In accordance with Section 953 of Title 49 of the Louisiana Revised Statutes, there is hereby submitted a fiscal and economic impact statement on the rule proposed for adoption, repeal or amendment. **THE FOLLOWING STATEMENTS SUMMARIZE ATTACHED WORKSHEETS, I THROUGH IV AND WILL BE PUBLISHED IN THE LOUISIANA REGISTER WITH THE PROPOSED AGENCY RULE.**

I. ESTIMATED IMPLEMENTATION COSTS (SAVINGS) TO STATE OR LOCAL GOVERNMENTAL UNITS
(Summary)

The proposed rule will result in a cost of approximately \$2,000 for printing costs of the proposed and final rules in FY 16. The proposed rule will create a new classification of limited services pharmacy permit, for the purpose of enabling the establishment of remote processor pharmacy sites.

II. ESTIMATED EFFECT ON REVENUE COLLECTIONS OF STATE OR LOCAL GOVERNMENTAL UNITS
(Summary)

The proposed rule will likely result in an indeterminable increase in fees and self-generated revenues to the Board of Pharmacy. The cost of a new pharmacy permit is set at \$150 by statute while a renewal permit is set at \$125. The Board of Pharmacy does not anticipate issuing a large number of permits.

III. ESTIMATED COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS OR NON-GOVERNMENTAL GROUPS (Summary)

The proposed rule will create a new classification of limited services pharmacy permit known as remote processor pharmacy sites. The proposed rule identifies the general requirements, licensing procedures and operational standards. This type of pharmacy permit will not be authorized to procure or possess drugs for dispensing to patients, but they will be authorized to provide clinical services for other pharmacies, specifically the remote processing of medical orders or prescriptions for other pharmacies. The cost to establish and operate this type of pharmacy will be substantially less than the cost to operate a basic community pharmacy due to the absence of drug costs; however, there could be significant technology or communication costs.

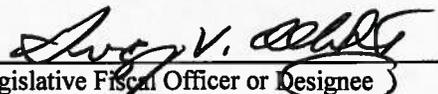
IV. ESTIMATED EFFECT ON COMPETITION AND EMPLOYMENT (Summary)

The proposed rule will enable the establishment of remote processor pharmacy sites within the state which has the potential to facilitate competition with such sites located in other states as well as the potential for a positive effect on employment.


Signature of Agency Head or Designee

Malcolm J Broussard, Executive Director
Typed Name and Title of Agency Head or Designee

July 9, 2015
Date of Signature


Legislative Fiscal Officer or Designee

7/9/2015
Date of Signature

FISCAL AND ECONOMIC IMPACT STATEMENT
FOR ADMINISTRATIVE RULES

The following information is required in order to assist the Legislative Fiscal Office in its review of the fiscal and economic impact statement and to assist the appropriate legislative oversight subcommittee in its deliberation on the proposed rule.

- A. Provide a brief summary of the content of the rule (if proposed for adoption, or repeal) or a brief summary of the change in the rule (if proposed for amendment). Attach a copy of the notice of intent and a copy of the rule proposed for initial adoption or repeal (or, in the case of a rule change, copies of both the current and proposed rules with amended portions indicated).

The Board proposes to amend *Chapter 24 – Limited Service Providers* of its rules to create a new classification of pharmacy permit, to enable the establishment of remote processor pharmacy sites. A copy of the Notice of Intent is appended.

- B. Summarize the circumstances that require this action. If the Action is required by federal regulation, attach a copy of the applicable regulation.

As pharmacies within the state seek out remote processing service providers, all of those providers are currently located in other states. The proposed rule seeks to create that same type of pharmacy permit for use within the state, to facilitate employment within the state as well as competition with non-resident pharmacies. The rule establishes the general requirements, licensing procedures, and operational standards.

- C. Compliance with Act 11 of the 1986 First Extraordinary Session:

(1) Will the proposed rule change result in any increase in the expenditure of funds? If so, specify amount and source of funding.

The Board anticipates an expenditure of approximately \$2,000 for the printing of the proposed and final rules. Those funds are budgeted and available from self-generated agency funds.

(2) If the answer to (1) above is yes, has the Legislature specifically appropriated the funds necessary for the associated expenditure increase?

(a) ____ Yes. If yes, attach documentation.

(b) ____ No. If no, provide justification as to why this rule change should be published at this time.

The Board operates totally on self-generated funds.

- D. Compliance with Act 820 of the 2008 Regular Session

(1) An identification and estimate of the number of small businesses subject to the proposed rule.

Given the criteria in the statutory definition of "small businesses", we are unable to specifically identify small businesses because the Board does not collect information from pharmacies concerning the number of employees or any information on sales, net worth, or other financial data. To the extent that all of the pharmacies licensed by the Board may meet the statutory definition of a small business, there are 1,951 pharmacies currently licensed by the Board.

(2) The projected reporting, record keeping, and other administrative costs required for compliance with the proposed rule, including the type of professional skills necessary for preparation of the report or record.

The proposed rule specifies the recordkeeping requirements and requires the use of electronic recordkeeping systems.

(3) A statement of the probable effect on impacted small businesses.

The proposed rule will enable small businesses to create new business locations.

(4) A description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed rule.

There are no alternative methods for achieving the purpose of the proposed rule.

FISCAL AND ECONOMIC IMPACT STATEMENT
WORKSHEET

I. A. COSTS OR SAVINGS TO STATE AGENCIES RESULTING FROM THE ACTION PROPOSED

1. What is the anticipated increase (decrease) in costs to implement the proposed action?

<u>COSTS</u>	<u>FY 15-16</u>	<u>FY 16-17</u>	<u>FY 17-18</u>
PERSONAL SERVICES	\$ 0	\$ 0	\$ 0
OPERATING EXPENSES	\$ 2,000	\$ 0	\$ 0
PROFESSIONAL SERVICES	\$ 0	\$ 0	\$ 0
OTHER CHARGES	\$ 0	\$ 0	\$ 0
EQUIPMENT	\$ 0	\$ 0	\$ 0
MAJOR REPAIR & CONSTR.	\$ 0	\$ 0	\$ 0
TOTAL	\$ 2,000	\$ 0	\$ 0
POSITIONS (#)	0	0	0

2. Provide a narrative explanation of the costs or savings shown in "A.1", including the increase or reduction in workload or additional paperwork (number of new forms, additional documentation, etc.) anticipated as a result of the implementation of the proposed action. Describe all data, assumptions, and methods used in calculating these costs.

The Board has allocated \$2,000 for the printing of the Notice of Intent and the Final Rule in FY 16.

3. Sources of funding for implementing the proposed rule or rule change.

<u>SOURCE</u>	<u>FY 15-16</u>	<u>FY 16-17</u>	<u>FY 17-18</u>
STATE GENERAL FUND	\$ 0	\$ 0	\$ 0
AGENCY SELF-GENERATED	\$ 2,000	\$ 0	\$ 0
DEDICATED	\$ 0	\$ 0	\$ 0
FEDERAL FUNDS	\$ 0	\$ 0	\$ 0
OTHER (Specify)	\$ 0	\$ 0	\$ 0
TOTAL	\$ 2,000	\$ 0	\$ 0

4. Does your agency currently have sufficient funds to implement the proposed action? If not, how and when do you anticipate obtaining such funds?

The Board has sufficient funds budgeted and available to complete the rulemaking project.

B. COST SAVINGS TO LOCAL GOVERNMENTAL UNITS RESULTING FROM THE ACTION PROPOSED

1. Provide an estimate of the anticipated impact of the proposed action on local governmental units, including adjustments in workload and paperwork requirements. Describe all data, assumptions and methods used in calculating this impact.

2. Indicate the source of funding of the local governmental unit that will be affected by these costs or savings.

To the extent a local governmental unit currently operates a pharmacy and also contracts with a non-resident pharmacy for remote processing services, it is possible the establishment of a remote processor pharmacy within the state should increase competition in that market and may yield cost savings for the pharmacy operated by the local governmental unit.

II. EFFECT ON REVENUE COLLECTIONS OF STATE AND LOCAL GOVERNMENTAL UNITS

A. What increase (decrease) in revenues can be anticipated from the proposed action?

<u>SOURCE</u>	<u>FY 15-16</u>	<u>FY 16-17</u>	<u>FY 17-18</u>
STATE GENERAL FUND	\$ 0	\$ 0	\$ 0
AGENCY SELF-GENERATED	Increase	Increase	Increase
DEDICATED FUNDS	\$ 0	\$ 0	\$ 0
FEDERAL FUNDS	\$ 0	\$ 0	\$ 0
LOCAL FUNDS	\$ 0	\$ 0	\$ 0
TOTAL	Increase	Increase	Increase

B. Provide a narrative explanation of each increase or decrease in revenues shown in "A". Describe all data, assumptions, and methods used in calculating these increases or decreases.

The proposed rule may result in an indeterminable increase in fees and self-generated revenues to the Board of Pharmacy. The cost of a new pharmacy permit is set at \$150 by

statute while a renewal permit is set at \$125. The Board of Pharmacy does not anticipate issuing a large number of permits.

III. COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS OR NON-GOVERNMENTAL GROUPS

- A. What persons or non-governmental groups would be directly affected by the proposed action? For each, provide an estimate and a narrative description of any effect on costs, including workload adjustments and additional paperwork (number of new forms, additional documentation, etc.), they may have to incur as a result of the proposed action.

The proposed rule will create a new classification of pharmacy permit located within the state for the provision of remote processing services. Currently, all of the remote processor pharmacies are located in other states, and pharmacies operating within the state seeking remote processing services are required to contract with those non-resident pharmacies.

Since remote processor pharmacies cannot procure or possess prescription drugs for dispensing purposes, their implementation and operational costs primarily relate to technology and communication costs, which should be significantly less than the cost to operate a basic community pharmacy. The proposed rule identifies the general requirements, licensing procedures, and operational standards.

Also provide an estimate and a narrative description of any impact on receipts and/or income (revenue) resulting from this rule or rule change to these groups.

The proposed rule will have no impact on the revenue of a remote processor pharmacy since there are no fees identified within the proposed rule.

IV. EFFECTS ON COMPETITION AND EMPLOYMENT

Identify and provide estimates of the impact of the proposed action on competition and employment in the public and private sectors. Include a summary of any data, assumptions and methods used in making these estimates.

To the extent a remote processor pharmacy could be established within the state, that pharmacy would operate on a competitive basis with the other non-resident remote processor pharmacies. In addition, the presence of the in-state remote processor pharmacy could have a positive effect on employment in that general community.



Signature of Agency Head or Designee

Malcolm J Broussard, Executive Director
Typed Name and Title of Agency Head or Designee

July 9, 2015

Date of Signature