



# THE SCRIPT

QUARTERLY NEWSLETTER  
MISSISSIPPI BOARD OF PHARMACY

## Happy New Year!

### January Board Meeting

Our next board meeting will be held on January 19, 2023, at the Board of Pharmacy office located at 6360 I-55 North Suite 400, Jackson, MS. The meeting will begin at 9:00 am.

**COMING  
SOON**

### Gateway "How to" Tutorial Videos

MS Board of Pharmacy is in the process of creating tutorial videos that will explain in a clear and concise manner how to navigate through the Gateway system. These videos will help individuals submit applications, name changes, and change of address. Also, videos will be provided for facilities to assist in submitting new facility applications and amendments to permit applications.

We, also, will be providing a how-to video for new employees (technicians, person in charge, and designated representative) who need help creating a Gateway profile. Videos will be located in Gateway, YouTube, and MS Board of Pharmacy website.

### Keeping Your Pharmacy Safe

MS Board of Pharmacy has noticed a rash of burglaries over the past month. Though preventing a burglary is difficult, there are some precautions pharmacies can use to reduce the chances of a burglary.

#### Assess security outside and inside

- Do you have a backup security system?
  - Cell phone backup
- Check for weak spots
  - Video Surveillance (Are there any blind spots?)
  - Windows, doors, drawer locks (Are there any broken locks?)
  - Lighting (Are there any dimly lit areas?)

#### Be attentive to your surroundings

- Be aware of strange behaviors (someone casing the pharmacy. Someone is overly attentive to cameras.)

#### Seek help

- Notify local authorities and MS Board of Pharmacy if you suspect a burglary, or if a burglary has occurred at your pharmacy.

**In case of burglary, always comply. Protect you and your staff first.**

**Report all burglaries and robberies to local authorities and MS Board of Pharmacy.**

**Report stolen or missing control substances to MS Board of Pharmacy by calling us at 601-899-8880 or email us [compliance@mbp.ms.gov](mailto:compliance@mbp.ms.gov) and complete DEA Form 106 [here](#).**



# ALL THINGS LICENSING

## Renewals

The renewal period closed on 12/31/2022. Any renewals completed after 12/31/2022 will be assessed a late fee. Renewal reminder notices were sent to the licensees and the permit holders (or designees). If you do not wish to renew and/or need to close the facility permit, please log into the Gateway, and submit a "Close Facility" application request at no charge. You will be required to upload supporting documentation regarding the closure request for staff approval.

The following licenses are up for renewal (licenses/permits expired 12/31/2022):

- Facility Controlled Substances registrations
- Drug Facility Permits
- Pharmacist Licenses and controlled substances registration

Our Licensing Division is readily available to assist with any renewal questions and/or Gateway issues. Do not hesitate to contact us.



## Profile Changes

**Any changes to your profile may be made by logging into the Gateway and submitting the desired change request at any time. For name changes, the system will allow you to make the request, you will need to upload the required documentation for staff approval. All employment and address changes can also be made via the Gateway. For assistance with the online system, contact our Licensing Division at (601) 899-8880.**

## Pharmacist Fill Up

We no longer mail wallet cards or stickers. To obtain, a wallet card, you may log into your Gateway profile, download the card, and print if desired. Any request for duplicate wall certificates may be made by logging into your Gateway profile and submitting a duplicate certificate application request. There is a 25.00 processing fee.

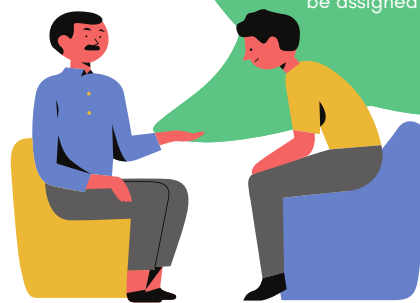


## Tech Bite

**Effective 1/1/2023**, the MS Board of Pharmacy **will no longer grant a temporary "pending" status for technicians** that have successfully submitted all application components except background check results. Until license has been issued, only technicians that are reflecting "active" on the licensing verification portal should be allowed in the dispensing area of a pharmacy.

### Student Sidebar Chatter

The Student Extern/Intern Controlled Substance Registration expires six months from the prospective graduation date. Register with the Gateway to access your registration. Upon issuance of your Mississippi pharmacy intern/extern student registration, you will need to register with the National Association of Boards of Pharmacy ([www.nabp.pharmacy](http://www.nabp.pharmacy)) at no charge to you. You will be assigned an NABP number.



# ALL THINGS LICENSING

## Facility Highlight

Any **changes** to your permit (i.e., PIC/DR changes, address changes, business name changes, and/or ownership changes) may be made by logging into the Gateway and submitting the desired change application at any time. Supporting documentation uploaded may be required for staff approval. For DR changes, make sure to mail your fingerprint card to the address indicated on the instruction sheet as soon as possible. Failure to do so will result in expiration of your application. For assistance with the online system, contact our Licensing Division at [601-899-8880](tel:601-899-8880).

PIC changes must be completed in a timely manner to prevent any interruption in operation. Make sure that there are two emails listed on the record (one for the PIC and one for an admin, in the event that the PIC vacates his/her position). This will ensure all notices regarding the PIC change application process will be received by the facility.

**If the PIC has not renewed his/her pharmacist license, the system will NOT allow the renewal of their facility's permit.**

# PMP Update



The MSPMP has been made aware that some email domains are blocking the password reset link. To assist with this, there is an option to add your private cell phone number to your account. If you have changed your employment, email, or any other information regarding your profile you do not need to create another account. Simply send an email with the updated information. You may send these requests via email to [msmpassist@mbp.ms.gov](mailto:msmpassist@mbp.ms.gov).

As a reminder to pharmacies that are eligible for a waiver of reporting to the MSPMP, **paper versions are not accepted**. PMP waivers are done electronically. Please notify the MS PMP directly in the event your permit is set to inactive or closed. Also, please notify the MSPMP directly should your pharmacy have a change of DEA number.

Reporting of controlled substances II-V and gabapentin is required every 24 hours. This includes zero reporting. All controlled substances II-V are to be reported with a valid DEA number. Should you need assistance with your reporting account for the MSPMP, please contact 1-855-567-4767 and ask to speak to the clearinghouse.

Have questions? Email us at [msmpassist@mbp.ms.gov](mailto:msmpassist@mbp.ms.gov), call us at [601-899-0138](tel:601-899-0138), or visit our website at <https://pmp.mbp.ms.gov/>.

# Compliance Check



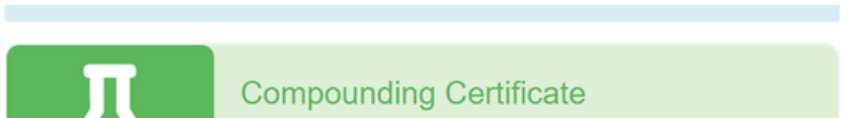
## Compounding Statistical Report

Don't forget to submit your Compounding Statistical Report no later than January 31, 2023! This report must be filed with the Mississippi Board of Pharmacy each year for every pharmacy that has a compounding certificate. Compounding data submitted will cover January 1, 2022, through December 31, 2022. The form can be found in the Gateway Portal- see below for instructions.

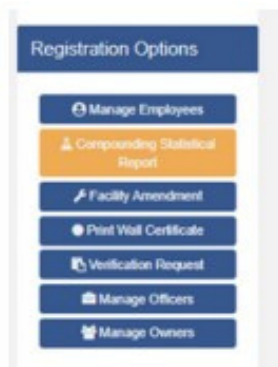
Pathway to Upload Your Compounding Statistical Report (**DUE January 31, 2023**)

- Only for Sterile Compounds. If you only compound non-sterile, report zero.
- Only applicable if you have a compounding certificate.

**Step 1: Go to the Gateway and click on the green tile of your compounding certificate.**



**Step 2: Then on the left hand of the screen, click "Compounding Statistical Report".**



**Step 3: Download the template and then upload your completed Statistical Report.**



## CE Audits: Changes

We now gather documentation for our CE audits electronically. In 2022, we began auditing when the pharmacist license renewal season opened. Licensees attested to completing CE from the previous licensing year. This meant for the 2022 renewal season, you attested to completing CE from January 1, 2021, through December 31, 2021. In 2023, when you launch your pharmacist renewal application, you will receive notification if you have been chosen for the CE audit. Whether or not chosen for the CE audit, you will still attest to completing CE from January 1, 2022, through December 31, 2022. **If chosen for the audit, you will need to provide documentation of CE obtained from January 1, 2022, through December 31, 2022,** by uploading it to the gateway. If you have any questions regarding the changes to our CE audits, please reach out to us at [601-899-8880](tel:601-899-8880) or email us at [compliance@mbp.ms.gov](mailto:compliance@mbp.ms.gov).

# Compliance Check



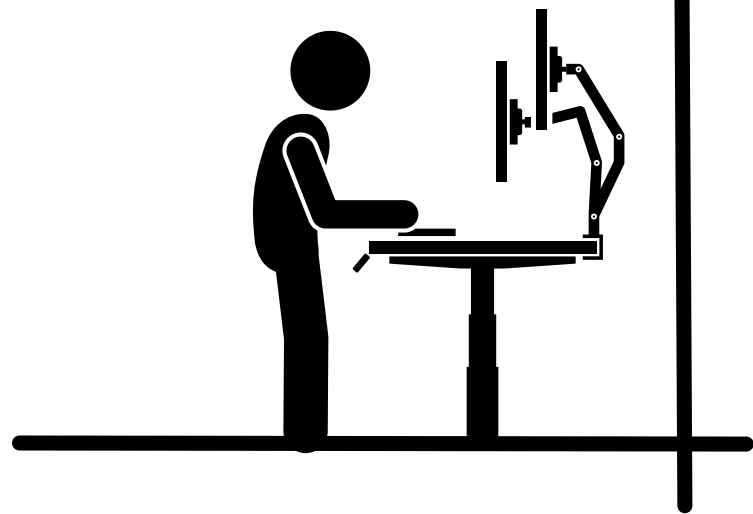
## DEA Considerations for MS Ambulatory Surgery Centers (ASC) and Multi-provider Clinics

The DEA has set an April 1, 2023, compliance deadline for ensuring that any ASC or multi-provider clinic acquiring controlled substances under a single provider's registration be transitioned to a DEA facility registration. DEA will only issue the facility registration if there is an underlying state-based pharmacy permit. Some of you may have been approached by now to serve as PIC (Pharmacist in Charge) on the outpatient surgery center/clinic consultant pharmacist permits. This permit requires at least a monthly arrangement with a pharmacist to review processes and ensure appropriate reconciliation of controlled substances. **A pharmacist does not need a consultant certificate to serve in this role as those are only needed for nursing home consulting.** Should you have any questions or concerns about the permits required or the process, please contact us at [601-899-8880](tel:601-899-8880) or email us at [compliance@mbp.ms.gov](mailto:compliance@mbp.ms.gov). See information from the DEA [here](#) and a joint statement from the MS Board of Pharmacy and the MS Board of Medical Licensure [here](#). Updated MS Board of Pharmacy regulations for ASC and multi-provider clinics will be released later in 2023.

### PIC Corner

***Commonly observed compliance violations seen during inspections for you to be aware of.  
Be aware, Be compliant!***

1. Unlicensed personnel or staff with expired license/registration
2. Employment location not updated with the Board of Pharmacy (pharmacists and techs)
3. Not printing the controlled substance printouts regularly
4. Not separating Schedule II medications from Schedule III-V medications on the annual controlled substance inventory
5. Not including whether the annual inventory was done at open or close of business
6. Training requirements for technicians
7. Transferring/borrowing medication between pharmacies not done by invoice or with
8. DSCSA consideration
9. Using the wrong prescriber DEA number
10. Expired medications in active inventory
11. Pharmacist-Tech ratio not followed



# Spotlight on Pharmacy Benefit Managers

## The end of DIR fees? Upfront Lowest Reimbursement Coming in 2024?

The 2023 final CMS rule for Medicare Part D included reforms to pharmacy direct and indirect renumeration fees. The implementation of these reforms was delayed until 2024. See the full webinar from KeySource and NCPA Legal Defense Fund [here](#).

### What the Final Rule Does

- Redefines negotiated price so that there is transparency at the point of sale.
- Negotiated price also applies during the coverage gap aka the doughnut hole.
- Lowers out of pocket expenses for customers.
- Creates a potential pharmacy cash crunch during first quarter of 2024.

### What the Final Rule Does Not Do

- Does not prohibit the contracting of retroactive penalty payments.
- Does not impact contract language between PBM and pharmacies including the amount or timing of payments or adjustments.
- Does not resolve the likely pharmacy cash crunch during the first quarter of 2024—simultaneously paying DIR fees for prior year and receiving lowest possible reimbursement (DIR at point of sale) on new claims. \*\*Consider reaching out to your PSAO or PBMs for assistance in spreading out 2023 payments.
- Does not provide actual reimbursement. Provides a worst-case scenario without incentive payments.
- Does not prevent early implementation of lowest net cost contracts.

Stay Connected

