



# THE SCRIPT

QUARTERLY NEWSLETTER  
MISSISSIPPI BOARD OF PHARMACY

## November Board Meeting

Our next board meeting will be held on November 17, 2022, at the Board of Pharmacy office located at 6360 I-55 North Suite 400, Jackson, MS. The meeting will begin at 9:00 am.

## Pending Status of Technicians

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. Thanks to electronic efficiencies, the processing time for background checks once fingerprints are submitted is now typically less than a week.

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. Performing or actively observing any technician related duty without an active registration will not be allowed. You can verify the licensing or registration status of any employee [on the licensing verification search](#) page.

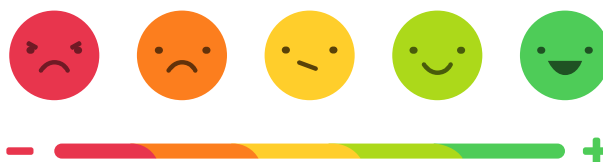


## APhA Well-Being Index Survey

Check out the Well-Being Index to:

- Assess your current level of well-being.
- See how your well-being compares to other pharmacy professionals.
- Track changes in your well-being over time.
- Gain access to resources to promote your well-being and address a variety of concerns.

[Click here](#) to create an account and complete the survey. Each state board receives monthly composite scores reflecting well-being and the workplace environment.



# ALL THINGS LICENSING

## Upcoming Renewals

The 2023 Renewal Period officially opened the end of August. Renewal reminder notices are sent to the licensees and the permit holders (or designees). Renewals completed after 12/31/2022 will be assessed a late fee. If you do not wish to renew and/or need to close the facility permit, please log into the Gateway and submit a permit close request. You will be required to upload supporting documentation regarding the closure request for staff approval.

The following licenses are up for renewal (licenses/permits expiring 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.

**DON'T FORGET**

**We have phased out wallet cards and will no longer be mailing out decals. You can print your wallet cards from your Gateway profile.**

### *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

## Pharmacist Fill Up

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 processing fee.

### Tech Bite

- The board has relaxed the requirement for national certification for pharmacy technicians for board registration. However, this does not supersede employment requirements.
- Upon issuance of your Mississippi pharmacy technician 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.

### Facility Highlight

- 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 may result in expiration of your application. For assistance with the online system, contact our Licensing Division at (601) 899-8880.
- Utilize the profile change option in the Gateway. Oftentimes a facility will submit a new application when it is not necessary.

## PMP Update



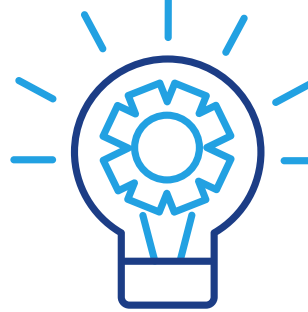
The MSPMP has been made aware that some email domains are blocking the password reset link. To assist with this, there is an option to add your private cell phone number to your account. If you have changed your employment, email, or any other information regarding your profile you do not need to create another account. Simply send an email with the updated information. You may send these requests via email to [mspmpassist@mbp.ms.gov](mailto:mspmpassist@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 [mspmpassist@mbp.ms.gov](mailto:mspmpassist@mbp.ms.gov), call us at [601-899-0138](tel:601-899-0138), or visit our website at <https://pmp.mbp.ms.gov/>.

# Compliance Updates



## Nursing Home Consulting Waiver

Nursing Home Consulting Waivers are available one time only. The purpose of this waiver is to allow pharmacists who are requesting to be nursing home consultants initially the time to attend an approved training course for consultants. Pharmacists that already have consultant certification does not need to request a waiver.

## Student intern/extern registrations

Student intern/extern registrations expire six months after graduation from a pharmacy school. Pharmacy students do not need an active student registration to take the NAPLEX or MPJE. However, in order to take these exams, your intern/extern hours **must be current**. Intern/extern hours expire two years after graduating from pharmacy school. We are seeing an uptick in the number of graduates who are waiting a year or more after graduation before even attempting to take either exam for the first time. These graduates are then requesting extensions to their student intern/extern registrations. Pharmacy school graduates are encouraged not to follow this pattern. An attempt at both the NAPLEX and MPJE tests should be made within six months of graduating from pharmacy school.

## Changes to a CII Prescription in MS

The MS Board of Pharmacy (MSBOP) recently received communication from NABP regarding DEA's policy on CII changes. MSBOP staff have verbally verified this policy with local DEA field staff leadership. Until DEA provides additional written policy, they will defer to the state's policy on changes to a CII prescription. The MSBOP policy would allow changes to a CII prescription as outlined below.

### DEA Changes to a Schedule II Prescription

Pharmacist may change:

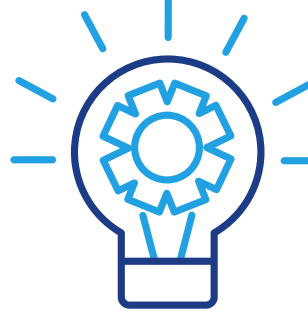
- Patient's address upon verification.
- Dosage form, drug strength, drug quantity, directions for use, or issue date only after consultation with and agreement of the prescribing practitioner.
  - Consultation should be noted on the prescription.
  - Must be in compliance with state law/regulation/policy.

Pharmacy may not make changes:

- Patient's name
- Controlled substance prescribed (except for generic substitution permitted by state law), or
- Prescriber's signature

You can find the information above at [www.mbp.ms.gov/compliance/changes-cii-prescription-ms](http://www.mbp.ms.gov/compliance/changes-cii-prescription-ms).

# Compliance Updates



## Track Trace: Drug Supply Chain Security Act (DSCSA) Nears Full Implementation

November 27, 2023 is the final date set for full implementation of the DSCSA. The final requirements for dispensers include item level tracing and an electronic, interoperable tracing system. In addition, FDA delayed enforcement of verification of suspect product until this date.

### Current dispenser requirements:

- Ensure you are only doing business with authorized trading partners (licensed to ship product into MS). [Verify on our licensing verification portal.](#)
- Receive, store, and provide product tracing information: only accept prescription drugs that are accompanied by transaction information, transaction history, and transaction statement. Product should contain the product identifier (composed of NDC and unique alphanumeric serial number, lot number, and expiration date) in 2D and linear formats unless product is grandfathered or waived.
- Establish procedures to investigate and properly handle suspect and illegitimate drugs.

### November 27, 2023 Requirements:

- Receive or exchange transaction information (with specific product identifiers for each package) and transaction statements electronically
- Implement systems/process for package level verification when needed, such as investigations of suspicious product
- Implement systems/processes for package to produce serialized transaction information for any regulatory or trading partner requests for an investigation
- Wholesaler or direct supplies may be able to assist in storing transaction information but the responsibility rests with the dispenser

Check out [Drug Supply Chain Security Act Resources for Dispensers](#) and be sure to check out the resources tab. For a DSCSA continuing education opportunity from NABP, [click here](#).

# Spotlight on Pharmacy Benefit Managers

## Below Cost Reimbursement

Our office routinely receives instances of below cost reimbursement for medication claims submitted to PBMs. For the majority of payors, per state statute 73-21-156, there must be a administrative appeal procedure to allow for reconsideration of any reimbursement below the pharmacy's acquisition cost.

Medicaid, contractors for Medicaid, and the State Health Plan PBM are not included in this statute. Reimbursement for Medicaid based claims are paid at NADAC plus a 11.29 dispensing fee. The most recent weekly NADAC files can be found [here](#). Pharmacies are encouraged to participate in received NADAC surveys. In addition, a pharmacy can reach out directly to the NADAC helpdesk to provide notification of acquisition costs or recent price changes that are not reflected in the posted NADAC files.

The NADAC Help Desk can be contacted through the following means:

[Click here for information instructions from MS Medicaid](#)

Toll freephone: (855) 457-5264

Email: [info@mslcrps.com](mailto:info@mslcrps.com)

Fax: (844) 860-0236

[Help Desk Form](#)

### Highlighted Helpful Instructions (from MS Medicaid Link above)

- Copies of invoices or screen shots of a wholesaler's website are acceptable if they show the following: the current price quote, NDC of the drug, and the time-date stamp. Contact the NADAC Help Desk for more complete instructions.
- The weekly NADAC file is officially released on Wednesday. If an update is needed, all inquiries received by the NADAC Help Desk between Friday at noon until the follow Friday at noon will be reflected on the following week's NADAC file.
- Remember NADAC is based on a national average of quotes collected from retail community pharmacy invoice costs. If a pharmacy cannot purchase a certain drug at or below the NADAC price, they are encouraged to discuss with their respective wholesaler or buying group.
- The NADAC is based on average of cost observations nationally and will not cover a specific provider's cost in every individual case.
- Most common reasons a NADAC may change weekly instead of monthly may be due to provider inquiries to the NADAC Help Desk or the WAC rate changes on a brand drug which triggers the Brand NADAC to be recalculated.

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