



Madison Brame

From: IRRC
Sent: Monday, December 19, 2022 9:59 AM
To: Madison Brame
Subject: FW: BPOA PROPOSED regulation #16A-66 (IRRC #3361): "Consideration of Criminal Convictions"

#3361

From: Michelle Elliott <melliott@irrc.state.pa.us>
Sent: Monday, December 19, 2022 7:32 AM
To: IRRC <irrc@irrc.state.pa.us>
Subject: Fw: BPOA PROPOSED regulation #16A-66 (IRRC #3361): "Consideration of Criminal Convictions"

From: Larry Jones <pshp.execdir@pshp.org>
Sent: Sunday, December 18, 2022 7:54 PM
To: Michelle Elliott <melliott@irrc.state.pa.us>
Subject: RE: BPOA PROPOSED regulation #16A-66 (IRRC #3361): "Consideration of Criminal Convictions"

CAUTION: **EXTERNAL SENDER** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ms. Elliott:

Thank you for sharing the proposed regulations-#16A-66 with us here at the Pennsylvania Society of Health-System Pharmacists (PSHP). From our perspectives the contents for consideration of what is defined and covered as "Considerations of Criminal Convictions" requires no discussion and we agree with the proposed regulations.

What we suggest however under – Bureau of Professional and Occupational Affairs,
 49 Pa. Code CH. 43b.443 Schedule of criminal convictions – State Board of Pharmacy

We believe that under 43b.404 – Consideration of criminal convictions:

(d) Drug Trafficking Offenses:

(2) This subsection applies to the following licensing board with the Bureau:

(ix) – The State Board of Pharmacy under sections 3(a) and 3.3(a) and (b) of the

Pharmacy act (63 P.S.

(ix) The State Board of Pharmacy under sections 3(a) and 3.3(a) and (b) of the Pharmacy Act (63 P.S. §§ 390-3(a) and 3.3(a) and (b)), pertaining to qualifications for licensure as a pharmacist and qualifications for pharmacy technician and pharmacy technician trainee registration.

The statute above included Pharmacists, pharmacy technician and pharmacy technician trainee registration – AND

should also include pharmacy interns and their registration process.

Thank you.
Larry

Larry Jones
Executive Director
Pennsylvania Society of Hhealth-System Pharmacists
PSHP.execdir@pshp.org

Sent from [Mail](#) for Windows

From: [Michelle Elliott](#)
Sent: Monday, December 12, 2022 1:21 PM
Cc: [Michelle Elliott](#)
Subject: BPOA PROPOSED regulation #16A-66 (IRRC #3361): "Consideration of Criminal Convictions"

For your information:

The Bureau of Professional and Occupational Affairs (Bureau) published the above-referenced regulation in the *Pennsylvania Bulletin* on November 19, 2022.

The proposed regulation is available on the *Pennsylvania Bulletin* website at the following link.
[Pennsylvania Bulletin \(pacodeandbulletin.gov\)](http://pacodeandbulletin.gov)

The proposed regulation is also available on our website at the following link.
<http://www.irrc.state.pa.us/regulations/RegSrchRslts.cfm?ID=3373>

The Bureau is inviting the public to submit written comments on the proposal. Please reference Regulation #16A-66 (IRRC #3361) on the correspondence. **The deadline for submitting comments to the Bureau is December 19, 2022.**

Please note that *all correspondence, public comments and documents submitted relating to a regulation are a matter of public record and will appear on IRRC's website* – www.irrc.state.pa.us.

If you have any questions, please feel free to contact me.

Thank you.

Michelle L. Elliott
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