

GEORGIA BOARD OF PHARMACY
Practical Examination Committee
Conference Call Agenda
2 Peachtree Street, NW, 6th Floor
Atlanta, GA 30303
July 29, 2020
1:00 p.m.

The following Committee members were present:

Lisa Harris, Chair
Michael Azzolin
Dean Stone
Judy Gardner, Consultant

Staff present:

Eric Lacefield, Executive Director
Max Changus, Assistant Attorney General
Kimberly Emm, Attorney
Brandi Howell, Business Support Analyst I

Open Session

President Harris established that a quorum was present and called the meeting to order at 1:01 p.m.

The Committee discussed the future of the practical exam. Ms. Harris stated that the Committee has several options. The first option is business as usual with a wet lab and request the schools' help with social distancing the candidates. The second option is to modify the in-person practical by having a dry lab, with no mixing of the compounds, students can still meet with board members for interviews, and practice social distancing. The third option would be to have a virtual practical examination. Ms. Harris stated that Mr. Lacefield would need to research how to do that. She stated the issue with choosing the virtual option is that it would be the option for the whole year because normally that involves a contract. She further stated that the lab and patient profile would be multiple choice and there are various costs involved. She estimated the amount to be around \$20,000, which is what it would cost for a wet practical. Mr. Lacefield explained that the amount would be higher as the amount Ms. Harris stated was not with the same number of candidates. Mr. Lacefield stated the cost would be between \$23,000 to \$25,000 to test the same number of candidates.

Ms. Harris stated that the Board could coordinate with the schools of pharmacy; however, she is unsure about how the Board and the school could coordinate getting 400 students for the June exam to social distance. She commented that if the Board chooses the virtual option, maybe it could consider giving the exam more than four times a year. She added that, depending on how many students take the test, maybe the Board could meet with the candidates at the monthly board meeting. Ms. Harris stated that she contacted the North Carolina Board and they no longer do a practical, but they do conduct a group interview of some sorts. She stated that once she gets more information on that, she will present it. Ms. Harris stated that she also contacted the New York Board and they are doing theirs virtually through scantron. She further stated that the Committee could contact them if more information was needed.

Lastly, Ms. Harris stated the fourth option would be to no longer have a practical examination. Mr. Stone inquired about the virtual exam software previously discussed. Mr. Lacefield stated it is called ExamSoft. He stated many schools use it and that is what was recommended. He further stated that candidates would be required to use his/her own computer. Mr. Lacefield commented that in order to do it this way the format for which the Board gives an exam would need to be changed, such as no wet lab or interview. He stated we could administer Errors & Omissions and calculations using ExamSoft. He further stated that if that was the route the Board was looking to take, it may be possible to do the same sort of format in an in-person exam using the pharmacy schools, going forward. Mr. Lacefield stated that if schools are back in

session, the Board may be able to use the large classrooms to give the exam in person with a different format rather than having the candidates moving from room to room.

Mr. Stone commented that what bothers him is that COVID-19 has grown. He stated that as a result of the growth of COVID-19, the Board is planning differently. He stated there are reciprocity candidates that have been practicing in other states that are unable to get a license here currently and he thinks that is an issue. Mr. Stone stated another issue for him is the timeframe from August to January. He stated that the Board now has to take the budget into consideration. He further stated that no matter what, the Board will need to redesign the test if it decides to keep giving the practical. Ms. Gardner commented that the practical is supposed to be an entry-level practice exam and up until not too long ago, the Board did not require the practical exam for reciprocity candidates. She stated that the practical was intended to be an entry-level exam so when the student graduated from pharmacy school, he/she would know how to do the basics.

Mr. Azzolin stated he wanted to add some information to what Ms. Gardner was saying that backs up that concept. He referred to a chart he converted from data compiled by Mr. Lacefield in regards to the percentage of times the practical has to be taken a second time by license types. He stated for new graduates, only 2.88% have to take the test more than once; however, for those reciprocating from another state, 12.5% have to take the practical more than once. Mr. Azzolin stated this data shows him that licensed, practicing pharmacists struggle with this practical for some reason. He stated there could be various reasons behind it such as the candidate may not be fresh out of school or doing these types of calculations on a regular basis. He further stated that, by no means, does that imply the candidate may not be a good pharmacist just because 12.5% do not pass versus 2%. Mr. Azzolin stated that, to him, that may imply the candidate specializes in some type of pharmacy practice such as in a retail or hospital setting. He further stated this data demonstrates definitively that for people coming in from another state, the practical is not a practical. Ms. Harris agreed. Mr. Lacefield commented that the Board changed its rule in late 2013 requiring reciprocity candidates to take the practical. He stated the Board first started testing reciprocity candidates in January 2014.

Discussion was held regarding reciprocity applicants. Mr. Azzolin commented that this data tells him reciprocity candidates are equally intelligent; however, they are just not prepared for the Board's specific questions in the practical. For example, all computer systems that generate labels for prescriptions generate labels that are compliant with Board of Pharmacy rules. He stated that he would assume a practicing pharmacist does not scrutinize a label the way he/she would have to scrutinize when they take the practical and as the Board has seen, some may miss those to a point that would prevent them from practicing in the state, whereas in reality, that would not be an issue in their practice. He further stated that in terms of reciprocity, he does not think the practical is something that should even be considered.

The Committee discussed the graphical data provided by Mr. Azzolin. He commented that what this data tells him about the practical is that it is hard for the candidate to complete. He stated the candidate may be good at evaluating patient profiles on the floor of the hospital, for example, but may not be clear on how to calculate the number of pills to go into a compounded cream; however, he stated if the candidate had access to materials to look up that information, he/she could get up to speed on those things. Mr. Azzolin stated he does not agree with requiring the practical exam for reciprocity applicants. Ms. Harris responded that what was presented is hard data that convinces her even more that the Board should not require the practical for those pharmacists reciprocating into Georgia. She further stated that this topic could be discussed further with the Board.

Mr. Azzolin discussed the data presented on the number of times candidates that took the MPJE a second time and had to take the practical a second time. He stated that this data tells him that candidates who are struggling cognitively for whatever reason on one test will struggle on another test. He added that he

believes the Board is duplicating and validating these pharmacist's cognitive capabilities. He stated one test can do what the other test does and they are highly likely to fail the MPJE if they fail the practical; however, the other data reflects if the candidate fails the MPJE or the NAPLEX, they are not near as likely to fail the practical.

Ms. Harris commented that the Committee needs to concentrate on how it feels the Board should proceed with the practical if it were to proceed. Mr. Azzolin responded by stating that the Board has in place what it needs to be doing and that is just not test until the State of Emergency is over. He continued by stating that the Board does need to address reciprocity applicants. He proposed the Committee recommend doing away with the practical all together. Ms. Harris responded that the traditionalist in her does not want to do away with it yet, but if the Board were to do away with it, this would be the opportune time because it would be difficult to test. She stated that the pandemic may continue through winter and January is right around the corner. She further stated that the Committee needs to make suggestions now as to what the Board will do in January such as waiving the practical again or go to a virtual exam as she doubts the Board would be able to give the exam in person. She asked Mr. Lacefield for his thoughts. Mr. Lacefield commented that at this time, his understanding was all schools will be holding classes in some form or another. He stated that the question is whether or not the Board wants to continue administrating the exam and if it does, would the Board want to continue to do so in the same format it has been doing it in. He added that as long as the State of Emergency is in place, the Board has the ability to not have the exam and continue this procedure. He stated that whether there is a pandemic or not, the Board needs to decide the fate of the exam. Mr. Lacefield explained that as long as the pandemic is here, the Board can waive that requirement and then after, the Board can offer it the way it has previously administered the exam, if that is the desire of the Board.

Ms. Harris stated that if the Board does administer the practical in person, it would have to do so at a place with a large facility capable of handling social distancing students, such as at the University of Georgia. She suggested not having the wet lab, but administering the exam over more than one day. Mr. Stone commented that if the exam were to be spread out, that means expenses would increase. He discussed the fact that the pandemic may continue on for an uncertain amount of time and he wonders what would be the point of giving the practical then. He commented that he has considered doing away with it; however, if the Board were to give a virtual exam, that entails redesigning the exam. Mr. Stone asked Ms. Gardner for her thoughts as a former board member. Ms. Gardner stated that the Board is covered during the pandemic and also for 120 days after the end of the State of Emergency. She stated that the Board will have four months after the end of the pandemic to figure out what to do; however, it may want to do that in two months as Mr. Lacefield will need additional time. She commented that in regards to new graduates, in the past the curriculum has been made to include some of the things that are important for a pharmacist to know and when the Board did not have particular types of questions, those things were not taught. She continued by stating that the Board of Pharmacy's primary focus is to protect the safety and welfare of the citizens of Georgia. Ms. Gardner stated that by whatever means, by having an exam or not, that should be the guiding principle. She stated that candidates applying for licensure by reciprocity is a different conversation than the new graduates. Mr. Azzolin responded that would be making the assumption that those students are not having to take any other exams or prepare to be a pharmacist relative to being able to perform complex functions. He stated that he has not taken the NAPLEX in a long time and remembers the thought processes he had to go through. He further stated that in looking at the comparison between the passing rates of students versus the passing rates of those individuals reciprocating, that data would imply practicing pharmacists are less knowledgeable than the students from an entry level perspective. He would argue that the exams the candidate already have to take, plus the fact the individual has graduated from an accredited school of pharmacy, show that he/she is capable.

Ms. Harris stated that 47 other states have chosen not to give a practical. Discussion was held regarding information provided by Mr. Azzolin found on NABP's website regarding State Restrictions for License Transfer (found at <https://nabp.pharmacy/wp-content/uploads/2019/09/Licensure-Transfer-State-Restrictions-May-2020.pdf>).

Ms. Harris commented that she hates to give up the examination. Mr. Stone responded by stating that during this time, the Board has had pharmacists receiving a license that have not tested. He stated that when discussion is about protecting the citizens of Georgia, this is happening now and the Board cannot go back and change it. He further stated that once things get back to normal, the way of doing business needs to be flexible, faster and be more adaptive than what we have now. Ms. Harris stated that by not having a practical exam would certainly be the easiest and less expensive thing to do. Mr. Azzolin commented that another advantage of not having a practical is the Board could use those two day meeting dates and be more proactive rather than reactive on certain items. He stated that the budget does impact the former board members that have to come administer the exam. Ms. Harris agreed. Mr. Azzolin also stated that for the GDNA agents, as much as they have to do, to administer the practical is taking away from other things they could be doing. Mr. Lacefield responded by stating that the Board could accomplish the same thing if it were to change the format as he would not be paying former board members to assist. He stated that the Board would not be doing the wet lab and interviews. Additionally, he stated staff would work that day whether they were at the practical or at an additional work session.

Mr. Stone stated that one thing he thinks of when he thinks about the in person exam is the fact that the board members were there. He further stated that new graduates and reciprocating applicants can see the board members and he believes that has an impact. Mr. Stone discussed how it made a positive impact on him. He asked what is the Board's goal? He commented that this is a lot of people that have to be moved in and out and still space them out for social distancing. He stated that he does not see how the Board can do it efficiently. Ms. Harris commented that if the Board does away with the exam, it does not mean it has to do away with meeting with them. She stated that some states require the candidates meet with the Board. Mr. Azzolin commented that South Carolina is somewhat flexible as opposed to making the candidate wait to get a license as he/she can meet with any board member even if that is at the board member's place of business. Ms. Harris responded that would be something to consider. She stated that the Board meets on a monthly basis and it could require candidates come to the meeting every month. Ms. Emm asked how would that work with how the current meetings flow with beginning in the morning and lasting all day. She inquired as to how candidate interviews would be incorporated into the meetings. Ms. Harris responded by stating that the times she had to do it was going to the board meeting and there was a 30 minute discussion with the new licensees as a whole. Mr. Azzolin suggested doing in-person meetings with the Board for only the reciprocity candidates versus new graduates. Ms. Harris responded by stating that the new graduates are the ones she would really like to meet with. She stated that the Board would need to prepare soon because it would be a lot of work between now and January.

Mr. Stone inquired as to the process of purchasing software if the Board were to offer a virtual exam as he stated that he believes the process would not happen overnight. Mr. Lacefield affirmed that the process would take time. Mr. Stone commented that he is aware the Board has 120 days to decide once the State of Emergency is lifted, but he keeps asking himself "what is the point?" Mr. Lacefield responded by stating that he would like for the Committee to review whether or not it would like to continue administering a practical. He stated that decisions can then be made as to how to administer it, if that is the case. He continued by stating that what he is hearing is that the exam is important and suggested the Committee look at changing the components of the exam, and if that is the case, the Committee can look at doing that in different ways. If we were to do a virtual exam, the wet lab and patient profile portions would not be done. He stated if the Committee is okay doing the exam virtually, there are two options. He stated the Board can buy the software and the candidate can take the exam virtually in his/her home or the Board can do an in-person exam without the patient profile, personal interviews, and wet lab. Ms.

Harris commented by stating the more this is discussed, the more she is seeing it is not necessary. She stated that she hates to say that because she likes giving the practical and as Mr. Stone previously said, it is a rite of passage; however, as Mr. Stone and Mr. Azzolin stated, she wondered if the Board is being redundant in what is being tested and if it was necessary. Ms. Harris stated that statistically, if the candidate cannot pass the Board's practical, the candidate is more than likely not going to pass the MPJE or NAPLEX. Mr. Azzolin commented that the data shows that the candidates did end up getting licensed; the individual may have had to take the practical, MPJE or NAPLEX multiple times, but regardless of that, he/she did receive a license.

After further discussion, Ms. Harris stated that the point of the meeting was for the Committee to take suggestions back to the Board. She stated that she would like to hear back from a few boards of pharmacy regarding their processes and present that information to the Board as options. She further stated that she believes the Board does need to discuss this matter at its next meeting as January is fast approaching. She asked for the Committee's thoughts. Mr. Azzolin stated that at the next Board meeting, the Board will be addressing certain topics relative to the exam such as what should the Board do with applicants reciprocating in to Georgia that have failed, but at this time, the Committee needs to stay focused on whether or not the Board should have a practical, and if so, what would it look like in the future. Ms. Harris stated that she is not ready to do away with the exam yet. Mr. Stone responded by stating that he is leaning towards doing away with the exam, but can wait to make a decision until more information is received. Ms. Harris asked for Mr. Changus' thoughts. Mr. Changus responded by stating that the Board has say over what practical exam it gives, but it is not really something that needs a lot of input from him. He stated that he has never taken the exam and does not necessarily know all the component parts of such. He stated that ultimately it is a policy call.

Mr. Azzolin made a motion for the Committee to recommend to the full Board to do away with the practical for all license types to include score transfer, new graduates, and reciprocity candidates. Mr. Stone seconded. Discussion was held. Mr. Azzolin commented that the full Board will have the opportunity to vote yay or nay on the Committee's suggestion. Ms. Harris opposed and commented that she would like to have something more concrete to present to the Board. After further discussion, Ms. Harris agreed with Mr. Azzolin and Mr. Stone's recommendation to do away with practical and the Committee voted in favor of the motion, with the exception of Ms. Gardner, who opposed.

Mr. Stone commented that he loves the profession of pharmacy and this is a subject that is hard for him to remove his personal feelings on. Ms. Harris agreed. She stated that there was a time in this country when there was a good bit of compounding done in a regular retail pharmacy and the pharmacist had to know how to do that. She stated that the purpose of the practical was to ensure the candidate knew how to mix things in the drug store and she feels that is no longer necessary as there is very little compounding done in a retail setting. Ms. Harris stated that while she does not work in a hospital setting and knows nothing about such, she feels the purpose of the practical is no longer there. Mr. Stone agreed. Ms. Gardner commented that she is in a different practice setting than the other members on the committee and stated there is a significant amount of compounding that goes on in hospital. She stated that being able to calculate a dose and get the decimal point in the right place is critical. Ms. Harris responded that one would normally have a calculator for that. Ms. Gardner agreed, but stated the pharmacist would still need to use common sense. She stated that her point was there are practices other than retail in Georgia that do a significant amount of math and compounding. She further stated that it does not apply to every person that wants to have a license, but the pharmacist does have to know how to use an IV bag and needle/syringe in certain practices. Ms. Harris stated that she understood and did not intend for her comments to be that black and white. She further stated that her point was that pharmacy is not like it was 20-30 years ago.

Discussion was held regarding information provided by Mr. Azzolin on NAPLEX Competency Statements found at <https://nabp.pharmacy/naplex-competency-statements/>. Mr. Azzolin specifically discussed “Area 2 – Safe and Accurate Preparation, Compounding, Dispensing, and Administration of Medications and Provision of Health Care Products” which includes calculations relative to compounding. He stated that his point is that this information is already tested on the NAPLEX and in doing away with the practical exam, the Board is not doing away with assessing whether or not a person can do calculations. Ms. Harris agreed. Mr. Azzolin stated that he was curious as to when the Board started administering the practical exam and when did NAPLEX and MPJE start. He stated that the reason he is curious is because the practical has been around for a long time and maybe the reason some of the other states are no longer giving the exam is because the MPJE and NAPLEX came along after and the state determined both were not necessary. He further stated that if the practical exam came first, the Board may not have taken the time to evaluate if it was necessary to still be given. Ms. Harris responded that if the candidate passed the MPJE and the NAPLEX, those are two good indicators the candidate knows what he/she is doing. She stated that she believes this is the information that the Committee needs to present to the Board. Ms. Harris stated that she would still like to ask other boards if it has been detrimental for them to not give the practical anymore, but thinks with USP 800 it has become obsolete, and there is data to back it up.

There being no further business to discuss, the meeting was adjourned at 2:33 p.m.

The next scheduled meeting of the Georgia Board of Pharmacy will be held via conference call on Wednesday, August 5, 2020 at 9:00 a.m., at the Department of Community Health’s office located at 2 Peachtree Street, N.W., 6th floor, Atlanta, GA 30303.

Minutes recorded by Brandi Howell, Business Support Analyst I
Minutes edited by Eric Lacefield, Executive Director