From Federal Foundations to State Flexibility

A New Model for Pharmacy Law

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Learning Objectives

Describe key factors influencing pharmacy law education, including the UMPJE, changes in state licensure requirements, and the expansion of distance education pathways.

Identify core components of a pharmacy law course that integrates federal and state law instruction.

Explain the structure of a student-centered approach to teaching state-specific pharmacy law, including jurisdiction selection and comparative activities.

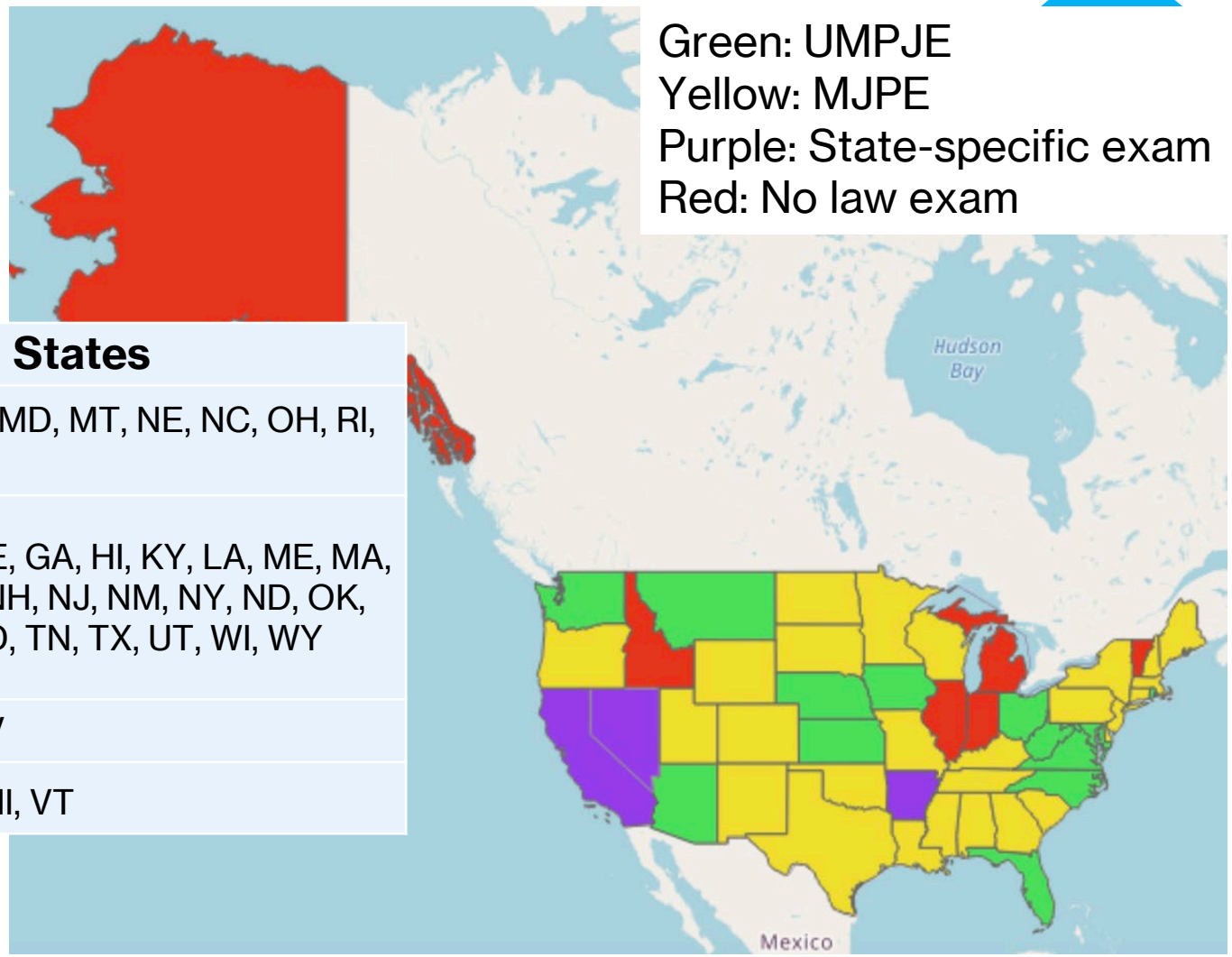
Recognize strengths and challenges observed during the initial course implementation, including student engagement, consistency, and assessment considerations.

Financial Disclosure

Lauren Forsythe declares that she has not had a relevant affiliation or financial arrangement with any ineligible companies that may have a direct interest in the subject matter of this continuing pharmacy education activity within the past 24 months.

Additionally, members of the District 4 Planning Committee and NABP staff involved in the planning of this activity do not have any current affiliation or financial arrangement with any ineligible companies that may have a direct interest in the subject matter of NABP's CPE program within the last 24 months.

Current Reality – Law Exam Requirements*



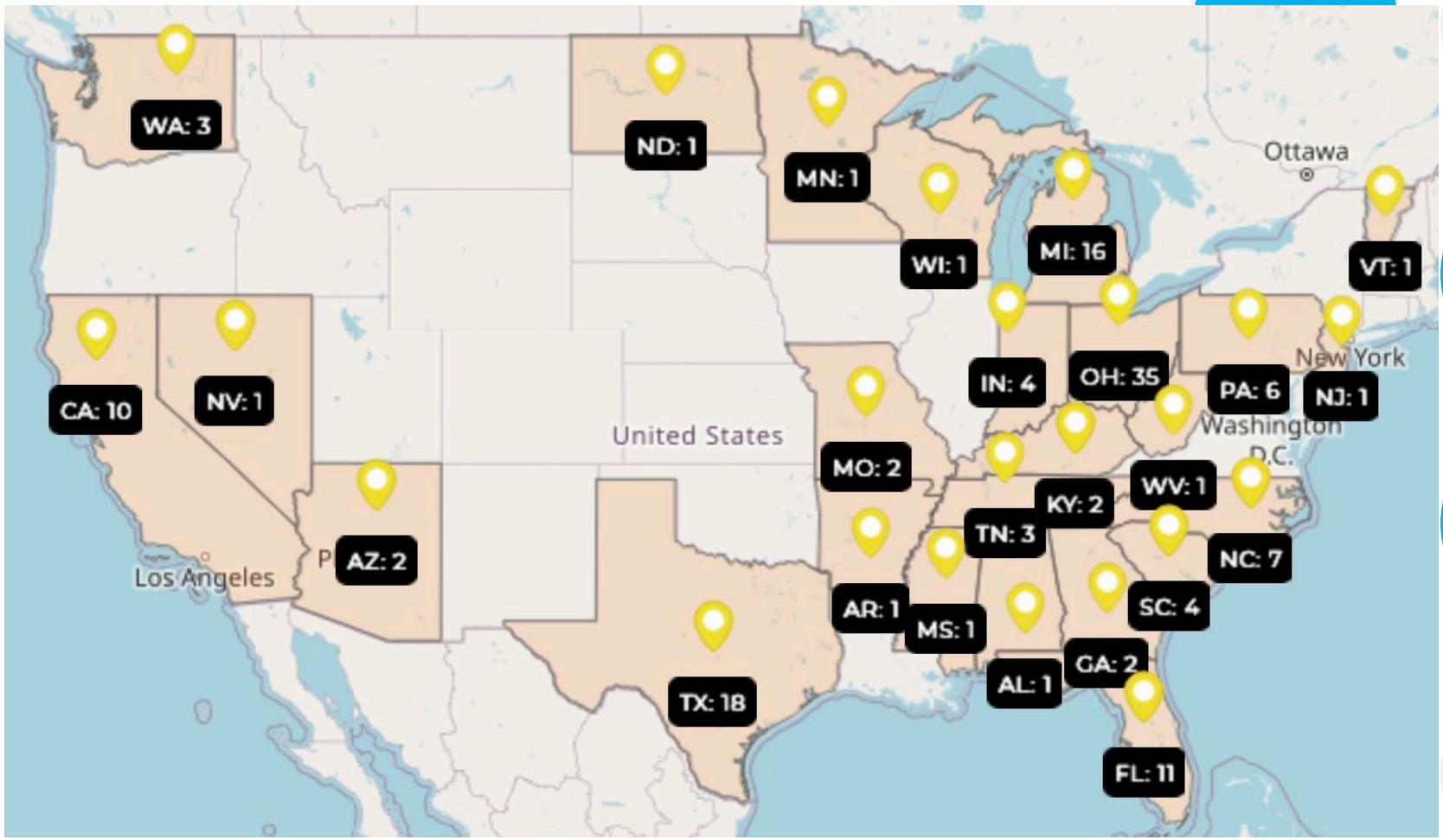
Category	States
UMPJE (13 states)	AZ, FL, IA, KS, MD, MT, NE, NC, OH, RI, VA, WA, WV
MPJE (29 states)	AL, CO, CT, DE, GA, HI, KY, LA, ME, MA, MN, MS, MO, NH, NJ, NM, NY, ND, OK, OR, PA, SC, SD, TN, TX, UT, WI, WY
State-Specific Exam (3 states)	AR, CA, PR, NV
No Law Exam (6 states)	AK, ID, IL, IN, MI, VT

*Currently published status as of 9/1/26

Current Reality – Distant Student Population

Exams

- No Law Exam
- UMPJE
- CPJE
- NVLE
- AR State Exam
- MPJE
  - Alabama
  - Georgia
  - Kentucky
  - Minnesota
  - Missouri
  - Mississippi
  - North Dakota
  - New Jersey
  - Pennsylvania
  - South Carolina
  - Tennessee
  - Texas
  - Wisconsin



Goals/Focus of Each Exam

UMPJE	CPJE	AR State Specific Exam	MPJE
• Federal law and laws common to most states	• CA law • Clinical (mini-NAPLEX)	• AR Law • Law readiness prior to APPEs	• Laws specific to the state the exam is in



Legally compliant pharmacists!

Course Goals to Support All Students

- Federal law
- Laws common across most states
- State law in student's state
- Preparation for law licensing exam when required
- Ability to find and apply law to practice situations

Course Design Considerations

Prior Knowledge

- Basics of Ohio law covered during P1 year in preparation for IPPEs
- Very basic intro to USP covered during compounding labs

Building a Foundation

- Basic info
- How to find laws, regs, guidance docs, etc
- Federal

Course Plan (2 credit hours)

First half of the semester

- Basic info
- Federal law
- How to find laws and regs
- Midterm exam (M/C and T/F)
- Identify state to focus on

Second half of the semester

- Competency based state law assignments
  - Knowledge assignment with partner comparison
  - Case application
- Case – based final assessment with open resources

Course Topic Outline

Federal Law	
Week Number	**Topic**
1	Introduction to law, the MPJE and the UMPJE
2	Drug Development, Production and Marketing (Federal)
3	Dispensing and PPPA (Federal)
4	Closed System of Controlled Substances (Federal)
5	DEA Diversion Investigator Guest Speaker (Federal)
6	Dispensing Controlled Substances (Federal)
7	Pharmacy Practice (Federal)
8	Compounding (Federal)

State Law	
Week Number	**Topic**
9	Spring Break
10	Midterm Exam (Covering all Federal)
11	State Law and Boards of Pharmacy (state)
12	Pure Food and Drug Laws (state)
13	Rules (state)
14	Controlled Substances (state)
15	Impairment, CE, and Practice Issues, Medical Marijuana & Pharmacy Licensure (state)
16	Final Case Analysis Assessment

Key Assignment/Assessment Descriptions – Federal

Finding Laws and Regs Video Assignment

- Students demonstrate their ability to locate key state and federal laws, regs, and guidance docs through a screen recording

State selection

- Select a state to focus on for the remainder of the course

Midterm Exam

- Standard exam consisting of M/C and T/F questions

Key Assignment/Assessment Descriptions – State

State law weekly knowledge assignments with partner comparison

- Students are asked to look up their state's specific regs on a list of topics
- Compare and contrast their state with a partner that selected a different state

State law weekly cases

- Short cases with specific situations to address
- Explain how they will handle it and cite applicable regulations

Final case assessment

- Cumulative case
- Students identify situations that require knowledge of laws
- Determine how they will handle the situation and cite applicable state and federal laws/regs

Assessments and Assignments Connected to Overall Goals

Federal law

- Lectures from first half of course
- Midterm exam
- Finding laws and regs assignment

Laws common across most states

- Partner comparison of state law assignments

State law in student's state

- Finding laws and regs assignment
- State law knowledge assignments
- State law case assignments

Preparation for law licensing exam when required

- Midterm exam
- State law knowledge (MPJE and state-specific)
- Partner comparison (UMPJE)

Ability to find and apply law to practice situations

- Finding laws and regs assignment
- State law weekly case assignments
- Cumulative case assessment

Student Feedback

- Liked the final case assignment but wanted the weekly cases to mimic it more
- Wanted the second half asynchronous (on-campus cohort)
- Did not like doing the partner comparison
- Wanted to review both cases for the final assessment before selecting one

Future Plans and Changes

Definitely Changing

- Course will be 3 credit hours starting Spring 2027
  - USP
  - Hazardous Drugs
  - More practice/discussion
- Final case assessment will be moved to finals week, and distance will complete it on campus
- Removing the short federal law review from each state law week
- Additional explanation for why partner comparison is important

Considering

- Asynchronous for the state law content for the on-campus cohort
- Adjusting the weekly short cases
- Only providing a community pharmacy case for the final assessment

Areas That Still Need to Be Addressed

Review process for licensure exams

- Wide variety of exams
- Exam timing

Assessment Question 1

Which factor(s) contributed to the need for a new approach to pharmacy law education?

a. Elimination of federal pharmacy laws
b. Expansion of distance education pathways
c. Changes in law licensure exam requirements in some states
d. B and C

Assessment Question 2

In this course model, students were asked to:

a. Study only Ohio law
b. Study laws from all 50 states simultaneously
c. Select one state to focus on during the second half of the course
d. Propose new pharmacy regulations

Assessment Question 3

According to student feedback, which aspect of the course was generally viewed positively?

a. Partner comparison assignments
b. The final case assignment
c. Federal law review lectures
d. Weekly quizzes

Questions?



Session Code

P3HC

0.5 contact hours (0.05 CEU)

0205-9999-26-114-L03-P

0205-9999-26-114-L03-T

Claims must be submitted by the morning of December 14, 2026.

https://nabp.pharmacy/claimcpe

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United We Test?

State Decisions on the Pharmacy Law Exam

Moderated by: Megan Kaun, PharmD

Panelists

- Al Carter, PharmD, MS, RPh
  - Executive Director, National Association of Boards of Pharmacy
- Karrie Southard
  - Director of Operations, Ohio Board of Pharmacy
- Susan L. Davis, PharmD, FIDP
  - Associate Dean for Pharmacy and Clinical Professor

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Learning Objectives

Analyze the effectiveness of the UMPJE implementation and its usefulness for pharmacist license transfer.

Examine the effectiveness of the early jurisprudence examination program in reducing or altering the timespan between graduation and license issuance.

Identify gaps in the assessment of the impact of jurisprudence examination changes on license portability, pharmacist workforce trends, and new graduate job mobility.

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Licensure Portability: UMPJE and Reciprocity

District 4

October 15, 2026

Lemrey “Al” Carter, MS, PharmD, RPh
National Association of Boards of Pharmacy
ExecOffice@nabp.pharmacy

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Celebrating the Launch of the

Uniform Multistate Pharmacy Jurisprudence Examination™

UMPJE™

A collaboration between internal and external stakeholders to develop a new high-stakes exam to meet the needs of our member boards of pharmacy.

APRIL 2026

LAUNCH FOR
EARLY ADOPTER STATES

AZ | IA | KS

NC | OH | RI

JUNE 2026

LAUNCH FOR
GENERAL ADOPTER STATES

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Early Administration Expansion

- Expansion of Early MPJE/UMPJE to 21 jurisdictions
- Collaborate with schools and colleges of pharmacy (SOPs) on communications to students to clearly outline program requirements.
- IT enhancements to MPJE application to enable eligibility automation without impeding NAPLEX Advantage registrations and/or NAPLEX applications.
- Streamline operational workflow.
- ***Positive feedback from SOPs at Annual AACP Conference!***

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What the UMPJE Delivers for Member Boards

- A validated, defensible tool built on national psychometric standards
- Streamlined reciprocity and score transfer across adopting states
- Reduced eligibility review burden and shorter applicant wait times
- Full jurisdictional autonomy — adopt ***or*** retain the state-specific MPJE
- Prepare states for future license portability models

A Replicable Model of Regulatory Excellence

Member-Driven Governance

Born from Resolution 118-3-22 — member boards set the mandate before a single item was drafted.

Evidence-Based Development

National Practice Analysis, psychometric rigor, and item writers licensed in 15+ states underpin every question.

Advancing License Mobility

Pharmacists in multistate, non-resident, and telepharmacy practice benefit immediately from reduced exam barriers.

Pre-Graduation Pathway

Effective July 1, 2026: Students in their final year of school in participating states may sit for the exam before graduation.

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Early MPJE In-State Pass Rate Data

Graduation Year	Pass Rate (N)
2025	77.6% (116)
2026	89.5% (162)

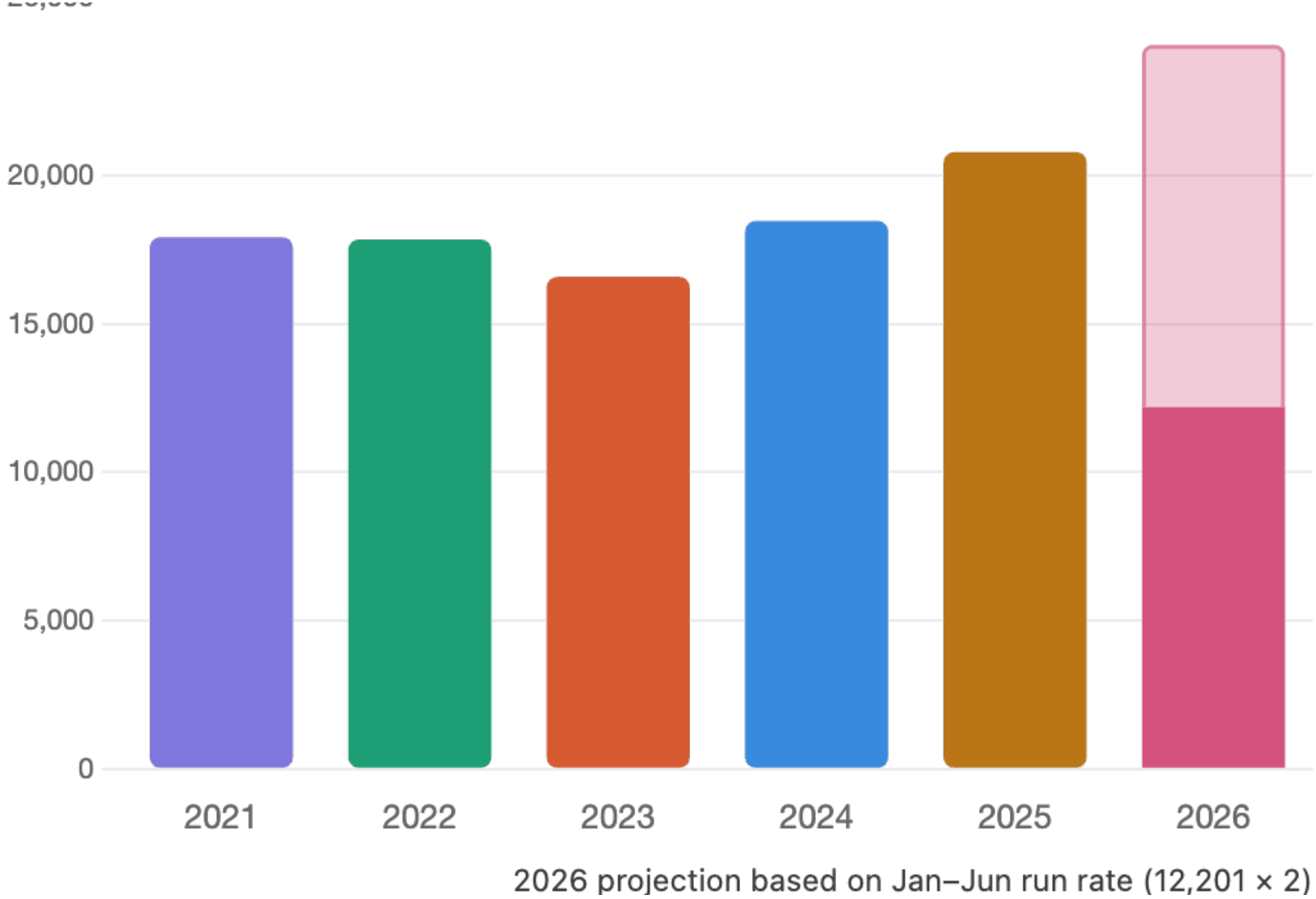
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Licensure Portability

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Annual License Reciprocity Numbers

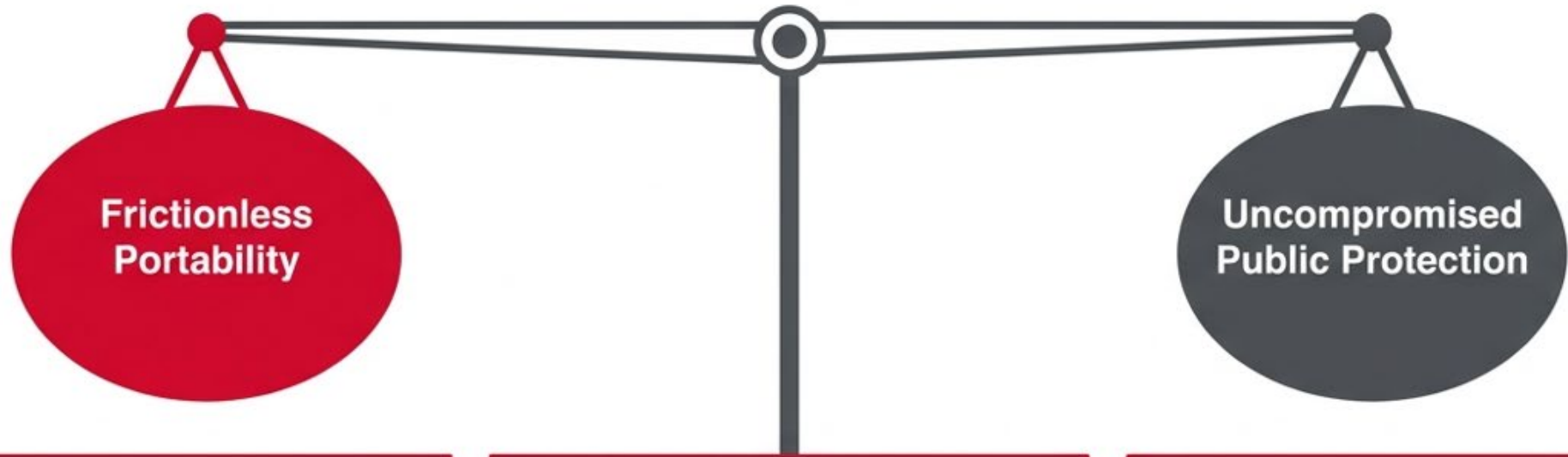


- As more pharmacy practice occurs across state lines, the need for licensure portability increases.
- 2025 had a record number of license transfer applications, and 2026 is projected to surpass the 2025 numbers.
- Interstate licensure portability is imperative for the future of pharmacy practice.

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The Interstate Mobility Imperative



1.0 Access to Care

Expanding public access to pharmacist services expediently to areas of need.

2.0 Military Portability

Providing enhanced licensure portability for active military members and their spouses facing routine relocation.

3.0 State Sovereignty

Preserving the participating state's specific pharmacy laws, regulations, and exact scope of practice.

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Pharmacist Interstate Practice Privilege



The Framework

A state registration pathway authorizing a pharmacist licensed in their resident state to practice in and into privilege states.

The Key Distinction

A Privilege is a legal authorization to practice under the nonresident state's laws and regulations, without requiring full licensure.

The Result

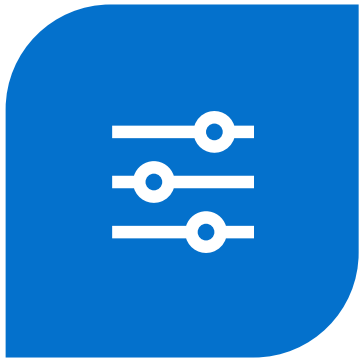
States maintain control over their scope of practice, collection of registration fees, and the ability to discipline.

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Ohio's UMPJE Implementation and Impact on Licensure

Karrie Southard
Director of Operations
Ohio Board of Pharmacy
Karrie.Southard@pharmacy.ohio.gov

Key Themes



CONCURRENT ACTIVITIES

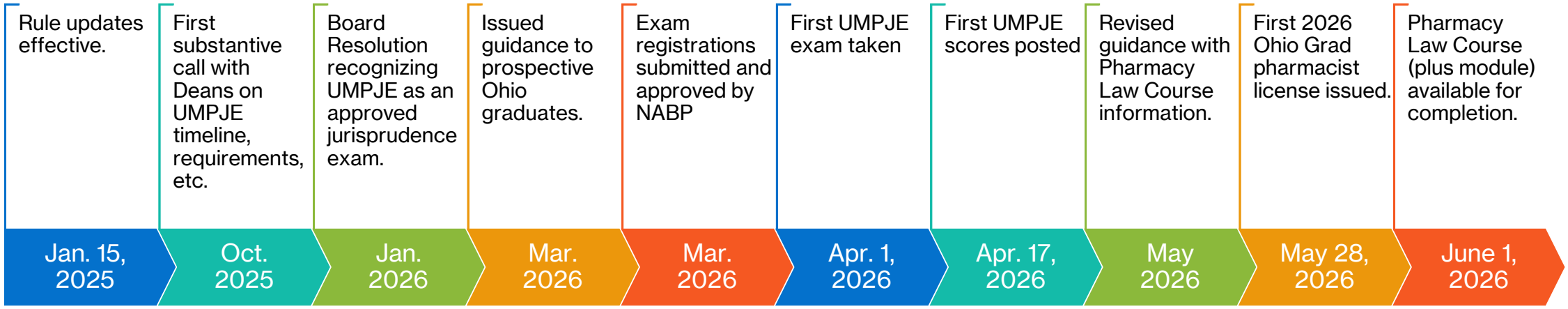


INCREASED COMMUNICATION EFFORTS



INTRODUCTION AND IMPACT OF APPLICANT CHOICE TO LICENSE PROCESS

Notable Milestones



UMPJE Utilization in 2026

- **Exam Type**
  - Ohio recognized successful completion of UMPJE or Ohio MPJE until September 30, 2026.

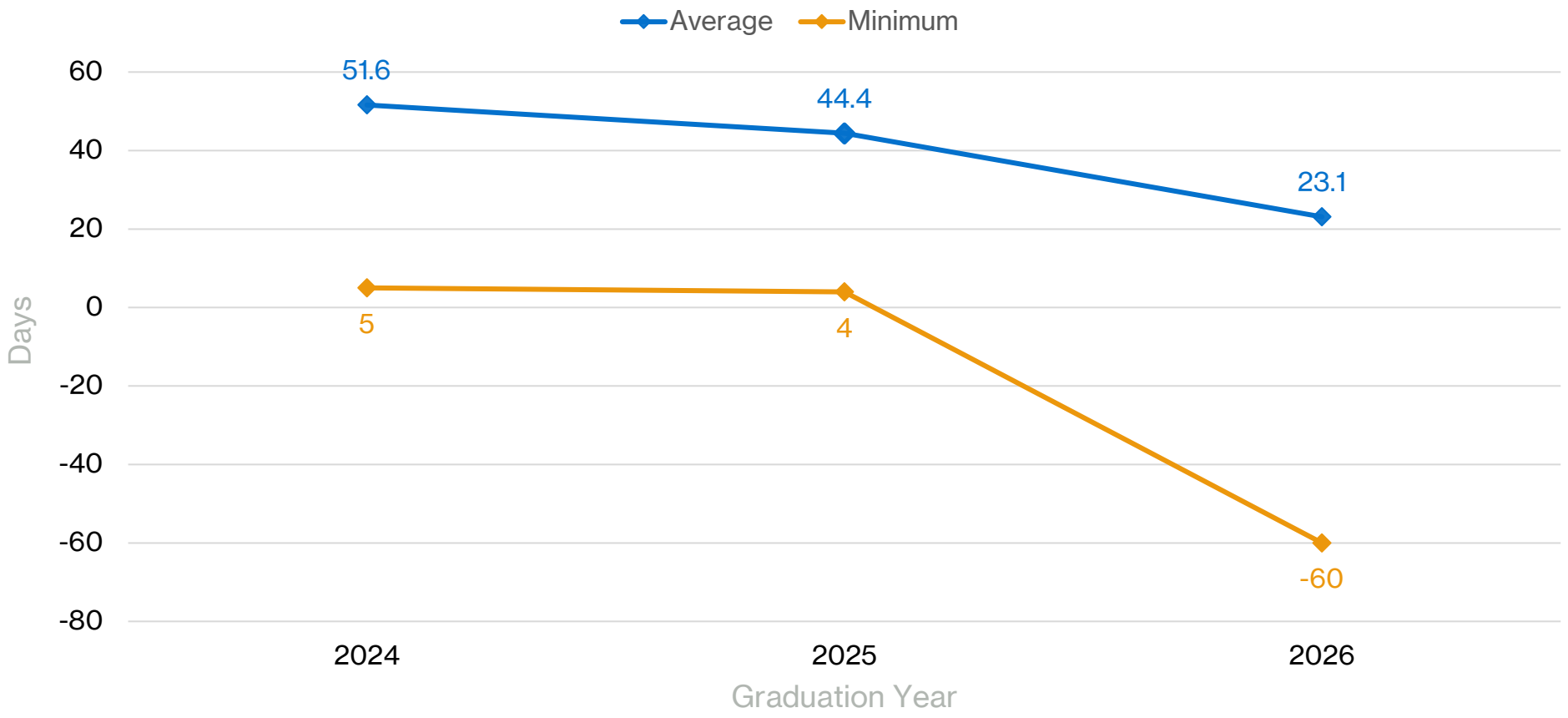
	UMPJE	Ohio MPJE
First Attempt	311	20

- **Exam Timing**

	Prior to Graduation	After Graduation
First UMPJE Attempt	102	211

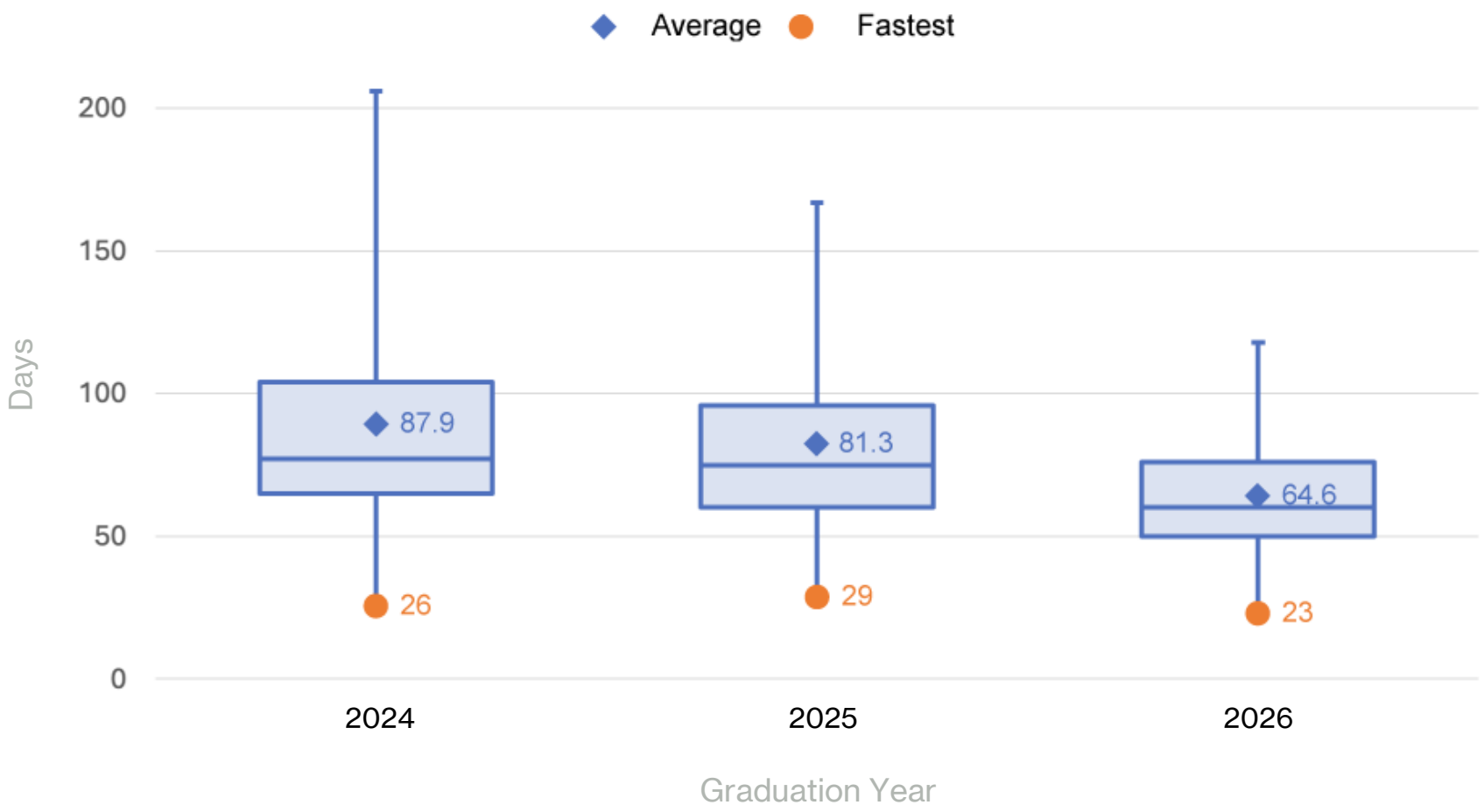
**First attempts by Ohio graduates as of 9/17/2026, NABP Exam Services*

Days From Graduation to First Exam Attempt



Source: Ohio Board of Pharmacy, Pharmacist by Examination data for Ohio pharmacy school graduates from 2024-2026
High outliers excluded per year: values above Q3 + 1.5 X IQR
Records retained: 2024: 371 (33 excluded) | 2025: 352 (21 excluded) | 2026: 295 (7 excluded)

Days from Graduation to Issuance



Source: Ohio Board of Pharmacy, Pharmacist by Examination data for Ohio pharmacy school graduates from 2024-2026
High outliers excluded per year: values above Q3 + 1.5 X IQR
Records retained: 2024: 348 (38 excluded) | 2025: 330 (35 excluded) | 2026: 259 (5 excluded)

Looking ahead for 2027 Grads

- Updated guidance posted and sent to prospective graduates in August 2026
- Eligibility application submissions available August 1, 2026, to December 1, 2026
- Ohio Pharmacy Law Course Eligibility granted in mid-August 2026
- Score Transfer allowance for early-passage of UMPJE

Key Factors for Success

- Communicate what you know and what you don't know *yet* with everyone (colleges, students, NABP, etc)
- Consider all changes that need to be made
  - Rules and Board approvals
  - License Applications
  - Guidance and Procedural Instructions
  - Technology systems
  - Collect data for monitoring and future evaluation

Case Study: Michigan's MPJE Removal

What changed, what the data shows so far, and what we still don't know

Susan L Davis, PharmD, FIDP

Associate Dean and Clinical Professor
Eugene Applebaum College of Pharmacy and Health Sciences

Wayne State University, Detroit, MI

sldavis@wayne.edu

Timeline: How Michigan removed the MPJE, from rule proposal to effect

Jun 1, 2023

Rule Set 2022-8 LR proposed & published in the Michigan Register, includes MPJE removal **[1]**

Jun 2, 2023

Public hearing held on the proposed rule changes **[1]**

Jun 13, 2023

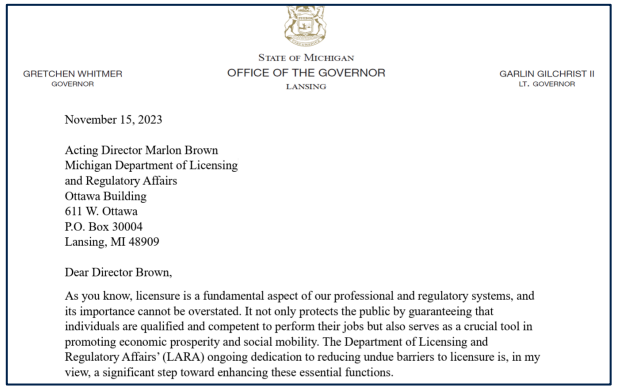
Rules Work Group agrees to eliminate MPJE

Oct 31, 2023

JCAR committee report on the rule set completed **[1]**

Nov 2023

Gov. Whitmer letter urges LARA to keep cutting licensing barriers (general, not pharmacy-specific) **[3]**



STATE OF MICHIGAN
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GRETCHEN WHITMER
GOVERNOR

GARLIN GILCHRIST II
LT. GOVERNOR

November 15, 2023

Acting Director Marlon Brown
Michigan Department of Licensing
and Regulatory Affairs
Ottawa Building
611 W. Ottawa
P.O. Box 30004
Lansing, MI 48909

Dear Director Brown,

As you know, licensure is a fundamental aspect of our professional and regulatory systems, and its importance cannot be overstated. It not only protects the public by guaranteeing that individuals are qualified and competent to perform their jobs but also serves as a crucial tool in promoting economic prosperity and social mobility. The Department of Licensing and Regulatory Affairs' (LARA) ongoing dedication to reducing undue barriers to licensure is, in my view, a significant step toward enhancing these essential functions.

Feb 29, 2024

Rule became effective, MPJE no longer required **[1]**

1 JCAR Report Form, Rule Set 2022-8 LR (Pharmacy – General Rules)- ars.apps.lara.state.mi.us

2 MI Board of Pharmacy Rules Committee Work Group minutes, 6/13/2023 - michigan.gov/lara

3 Gov. Whitmer Asks Michigan Licensing Dept. to Continue to Cut Red Tape - michiganbusinessnetwork.com

AUDIENCE CHECK-IN

Why might a state choose to remove the MPJE?

Call out what comes to mind.



Extra time and cost



Modernization/efficiency



Cutting red tape



Workforce shortage



Equitable access

Why did Michigan support the removal?

Paraphrasing from the public comments in support:

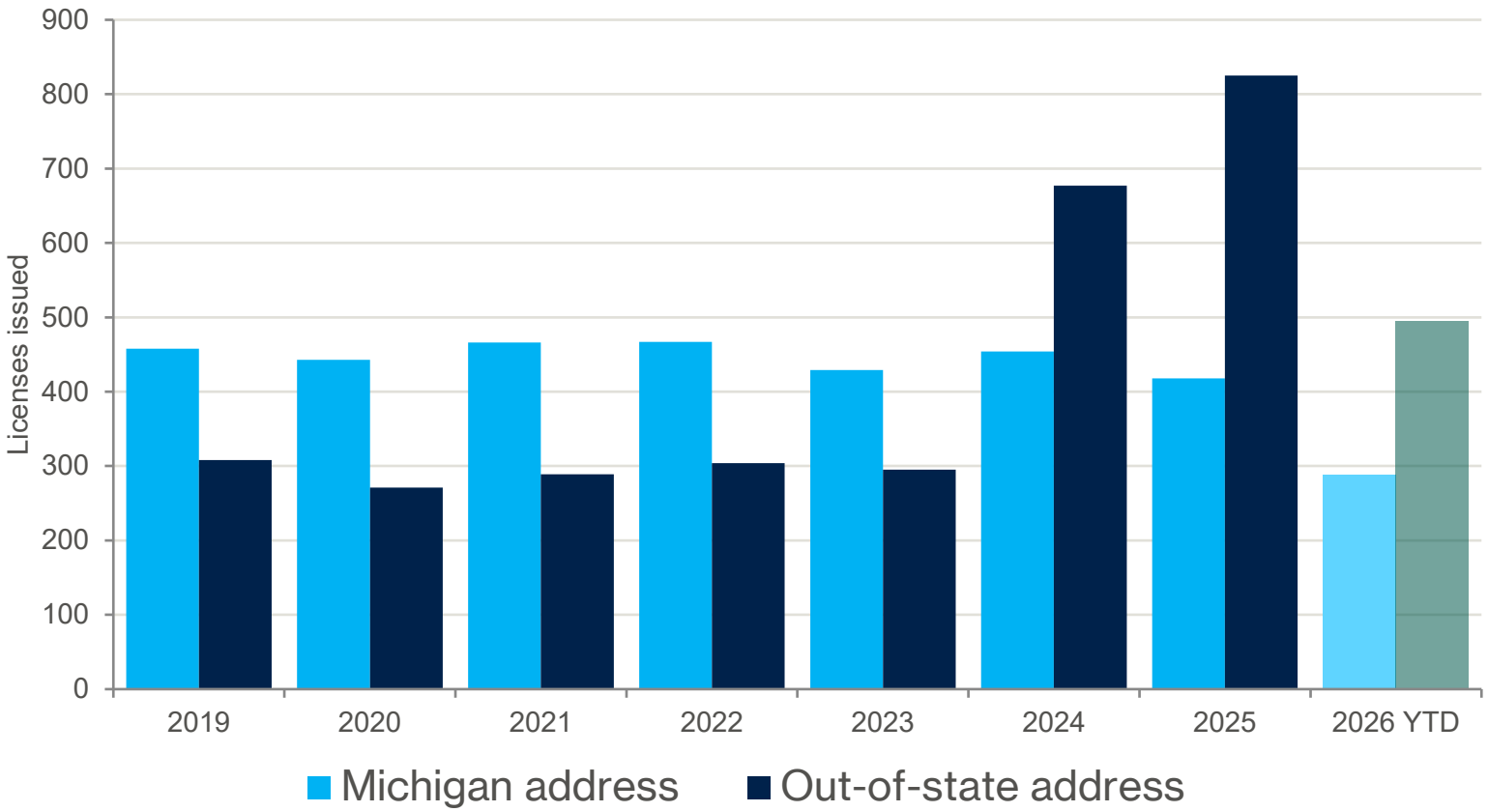
- Other professions don't require it, why do we
- It's not directly correlated with patient safety
- NABP, state associations, and schools have a financial conflict of interest
- Technology takes care of most issues
- This is already the schools' job
- Students already have enough expenses
- If AI can pass a standardized test, then it doesn't measure competency anyway
- We waived the requirement for COVID-19 and we were fine

The Rules Committee agrees with the comments to remove the MPJE requirement for the following reasons:

- There is no evidence that passing the examination increases a comprehensive knowledge of the law and therefore protects the public.
- The ACPE requires law to be taught in a pharmacy program.
- There is no evidence that the safety of the public is decreased if a licensee does not take the MPJE.
- Taking and passing the examination does not result in a pharmacist applying the law correctly.
- Technological advancements and electronic pharmacy dispensing systems have greatly facilitated adherence to professional practice standards. Many of the specific details, such as information on prescription labels or permissible refills, are now automatically checked and enforced by these systems, alleviating the burden on pharmacists to memorize every minute aspect of the laws.

What's Happened Since: License Volume

New pharmacist licenses issued in Michigan, by pathway (2019–2026 YTD)



66%

of new Michigan pharmacist licenses in 2025 came via out-of-state applicants — up from ~40% in the years before MPJE removal.

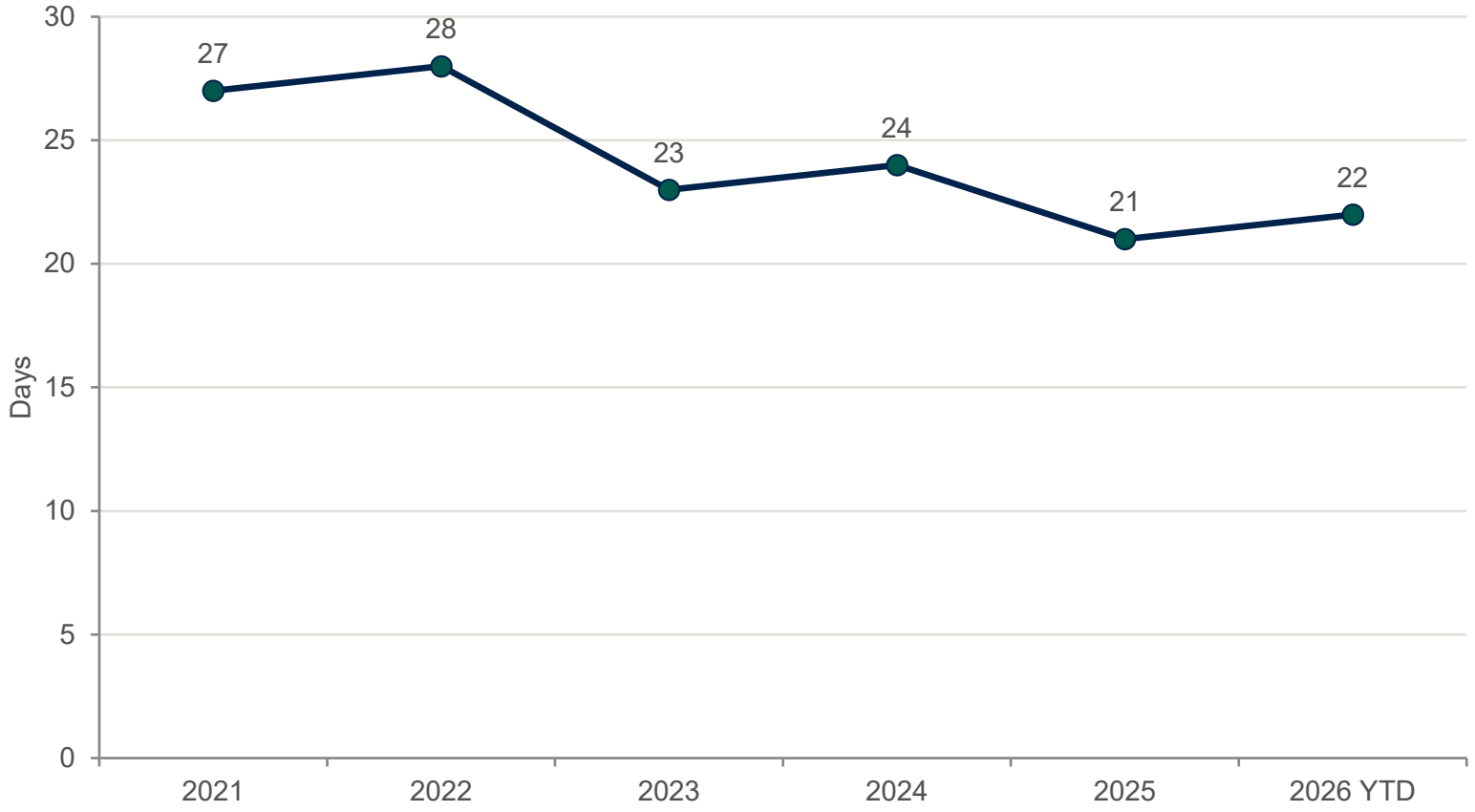
But most aren't practicing here

LARA requires a licensee's address on file to be current within the past 30 days. Most of these reciprocity licensees list addresses far outside Michigan. Hypothesis: this is consistent with mail-order/central-fill staffing, not new pharmacists relocating to practice in Michigan communities.

Michigan does not formally track/report # applications according to pathway (eg, new grad, reciprocity/endorsement. This graphic is extrapolated from the public dataset of licensed pharmacists at Michigan BPL, accessed August 31, 2026.

What's Happened Since: Processing Speed

Average licensure turnaround time, application to issuance (2021–2026 YTD)

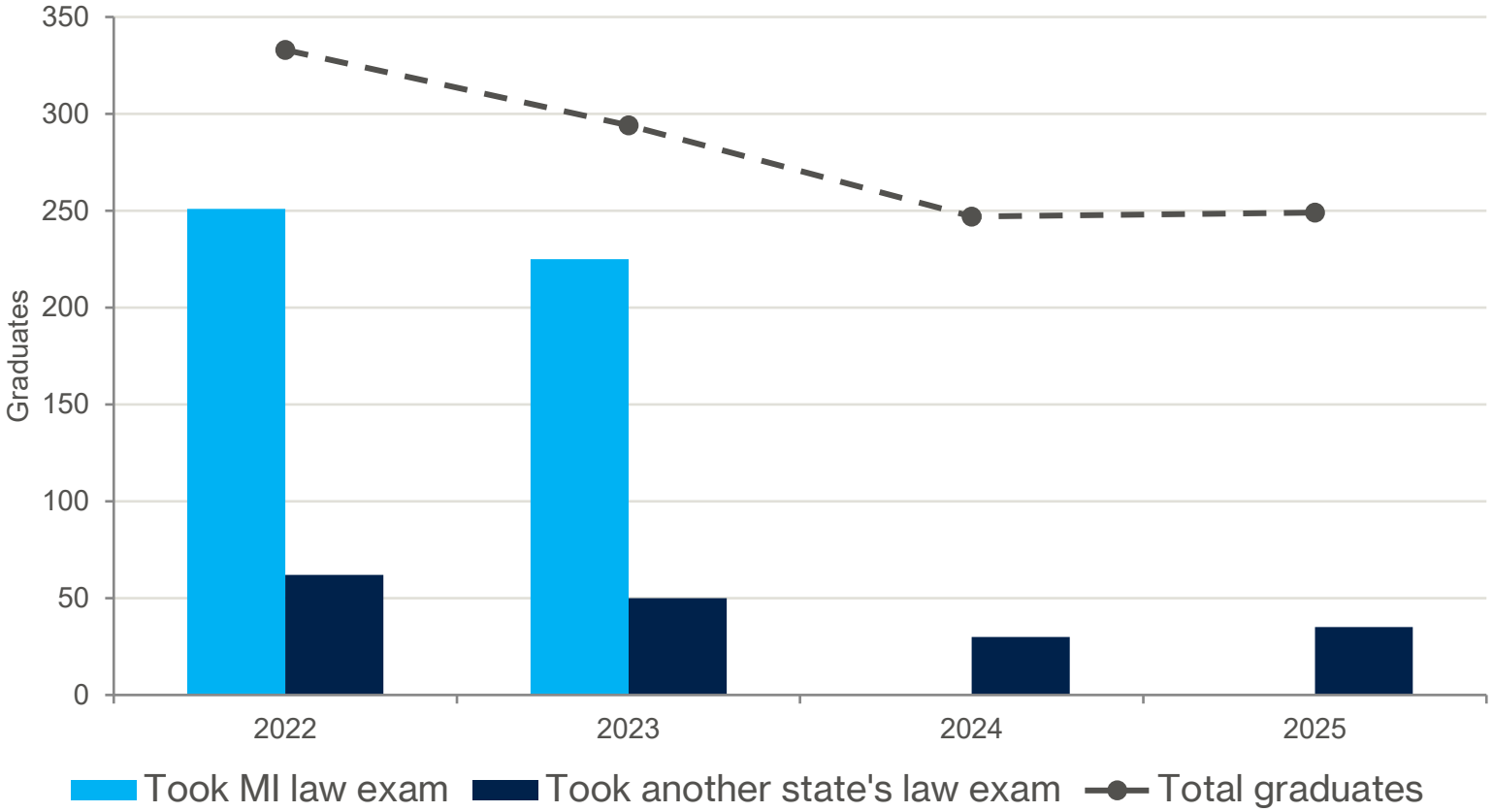


Average turnaround fell from 26.0 days (2021–2023) to 22.3 days (2024–2026 YTD).
A modest improvement, but the decline started before the MPJE removal.

Source: Michigan BPL FOIA request R193875-091126, completed September 16, 2026

What's Happened Since: New-Grad Exam Patterns

Michigan pharmacy graduates sitting for a jurisprudence exam, by grad year – MI's own exam and other states' exams are independent choices, not mutually exclusive



18.6% → 14.1%

of MI grads also sitting for another state's law exam

Almost no one sits for any law exam now that MI doesn't require one.

Source: Personal communication; thank you, Steve and Vicki/Gundy!

What are the unmeasured downstream effects?

Without a clear “why we did this” statement up front, it’s difficult to measure the desired impact

1 The public

Has patient-safety incident or complaint volume tied to law violations shifted since removal? No published data links the two, likely multifactorial.

2 Employers

Are pharmacy vacancy rates or time-to-fill actually improving? We measure license counts, so how can we evaluate impact on staffed positions and services offered?

3 Pharmacy workforce

Are newly-licensed pharmacists practicing in Michigan communities, including underserved* areas, or is this paper licensure?

4 New-grad licensure portability

Fewer MI grads are sitting for other state’ law exams. Is that closing off future licensure portability, and is anyone tracking it?

*Of the near 12,000 pharmacists licensed, 42 have addresses in HPSA counties. This does not accurately reflect location of care. MI does not currently trend pharmacy deserts by census tract.

ACTIVE LEARNING DISCUSSION

For each gap, who's a partner and what's a first step?

Same four gaps from the last slide, I'm going to make you talk to me.

Gap	One metric we care about	Who has the data?
The public		
Employers		
Pharmacy professionals		
New-grad portability		

Susan’s thoughts

- **License volume rose, but mostly out of state.**

  The reciprocity surge does not reflect new pharmacists relocating to serve Michigan communities.

- **New grads are quietly paying a mobility cost, but do they care?**

  Fewer MI grads test into other states’ law exams than before; this is a shrinking option, not a growing one, but they may not realize it yet.

- **State boards may not have the infrastructure to routinely monitor and report measures important to the profession.**

  There is an opportunity here for state-wide and regional partnerships to fill the gaps and improve future decision-making.

My challenge to the room: How do we build the evidence base before a greater rift grows in state requirements?

Session Code

F7J9

1 contact hour (0.1 CEU)

0205-9999-26-115-L03-P

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