



To: Board Members

Subject: VIII. Executive Officer's Report

a. Semi-Annual Report of the California Practice Standards and Jurisprudence Examination for Pharmacists (CPJE) Examination Statistics

Attachment 1

Examination scores for the California Practice Standards and Jurisprudence Examination for Pharmacists (CPJE) and North American Pharmacist Licensure Examination (NAPLEX) are released twice a year, generally in spring and fall.

The Semi-Annual CPJE statistical report for October 1, 2016, through March 31, 2017, reflects that the overall pass rate for the CPJE is 57.2 percent. The pass rate for graduates from the California schools of pharmacy is 66.4 percent. The overall pass rate for the NAPLEX is 88.0 percent. A copy of the Semi-Annual CPJE Statistical Report is provided in **Attachment 1**.

b. Discussion and Consideration of NABP's Letter to Congress Regarding the Dispensing of Non-United States Food and Drug Administration Approved Medicines to Patients in the US from Online Pharmacies

Attachment 2

One of the proposals being offered in Washington D.C. to offset the increase in the price of drugs is to encourage the purchase of medication on the Internet from non US websites where drugs are lower in price.

Over the years the National Association of Boards of Pharmacy (NABP) has reviewed nearly 11,500 online drug outlets and found 96% appear to be operating in conflict with pharmacy laws and practice standards. Such conflicts include pills that contain drywall and rat poison and cases involving patients' personal and financial information being stolen. In the worst cases, people have died from receiving counterfeit medications. The World Health Organization estimates that between 100,000 and 1 million people die each year from counterfeit medications.

NABP reports startling facts about the prevalence of rouge online drug sellers:

- Every day, 20 new illegal pharmacies appear on the internet, as reported by the Center for Safe Internet Pharmacies.

- 62% of medicines purchased online are fake or substandard, as indicated in a report from the European Alliance for Access to Safe Medicines.
- 89% of illegal online pharmacies do not require a valid prescription, as found through NABP's review and analysis.

Included in **Attachment 2** is NABP's letter to Congress regarding the dispensing of non-United States Food and Drug Administration (FDA) approved medicines to patients in the US from online pharmacies. At this meeting, the board will have the opportunity to discuss NABP's letter and any next steps the board may wish to take.

Attachment 1

**California State Board of Pharmacy
CPJE Statistics 10/1/16 – 3/31/17**

The charts below display data for all candidates who took the CPJE examination between 10/1/16 – 3/31/17, inclusive.

The board also displays NAPLEX scores associated with any candidate who took the CPJE during this six-month period and was reported to the board, regardless of when the NAPLEX may have been taken (it could have occurred outside the six-month reporting period noted above). Typically, the board reports CPJE performance data at six-month intervals.

Overall Pass Rates

CPJE

	Frequency	Percent
F	429	42.8
P	574	57.2
Total	1003	100.0

NAPLEX

	Frequency	Percent
F	117	12.0
P	856	88.0
Total	973	100.0

Location of School

CPJE

School			CPJE P/F		
			F	P	Total
California	Count		75	148	223
	%		33.6%	66.4%	100.0%
Other US	Count		312	366	678
	%		46.0%	54.0%	100.0%
Foreign	Count		42	60	102
	%		41.2%	58.8%	100.0%
Total	Count		429	574	1003
	%		42.8%	57.2%	100.0%

NAPLEX

			NAPLEX P/F		
			F	P	Total
School	California	Count	23	196	219
		%	10.5%	89.5%	100.0%
	Other US	Count	73	579	652
		%	11.2%	88.8%	100.0%
	Foreign	Count	21	81	102
		%	20.6%	79.4%	100.0%
Total	Count		117	856	973
	%		12.0%	88.0%	100.0%

Gender**CPJE**

			CPJE P/F		
			F	P	Total
gender F	Count		257	367	624
	%		41.2%	58.8%	100.0%
M	Count		172	207	379
	%		45.4%	54.6%	100.0%
Total	Count		429	574	1003
	%		42.8%	57.2%	100.0%

NAPLEX

			NAPLEX P/F		
			F	P	Total
gender F	Count		77	528	605
	%		12.7%	87.3%	100.0%
M	Count		40	328	368
	%		10.9%	89.1%	100.0%
Total	Count		117	856	973
	%		12.0%	88.0%	100.0%

California Schools

CPJE

			CPJE P/F		
			F	P	Total
CA school	UCSF	Count	13	32	45
		%	28.9%	71.1%	100.0%
	UOP	Count	20	34	54
		%	37.0%	63.0%	100.0%
	USC	Count	6	19	25
		%	24.0%	76.0%	100.0%
	Western	Count	12	11	23
		%	52.2%	47.8%	100.0%
	Loma Linda	Count	7	13	20
		%	35.0%	65.0%	100.0%
	UCSD	Count	2	9	11
		%	18.2%	81.8%	100.0%
	Touro U	Count	6	18	24
		%	25.0%	75.0%	100.0%
	Cal Northstate	Count	7	10	17
		%	41.2%	58.8%	100.0%
Total		Count	73	146	219
		%	33.3%	66.7%	100.0%

NAPLEX

			NAPLEX P/F		
			F	P	Total
CA school	UCSF	Count	2	43	45
		%	4.4%	95.6%	100.0%
	UOP	Count	4	50	54
		%	7.4%	92.6%	100.0%
	USC	Count	2	23	25
		%	8.0%	92.0%	100.0%
	Western	Count	4	19	23
		%	17.4%	82.6%	100.0%
	Loma Linda	Count	3	17	20
		%	15.0%	85.0%	100.0%
	UCSD	Count	0	11	11
		%	0.0%	100.0%	100.0%
	Touro U	Count	4	20	24
		%	16.7%	83.3%	100.0%
	Cal Northstate	Count	4	13	17
		%	23.5%	76.5%	100.0%
Total		Count	23	196	219
		%	10.5%	89.5%	100.0%

US Schools of Pharmacy

CPJE

		CPJE P/F		
		F	P	Total
school graduated from	Auburn	1	0	1
	Samford	0	1	1
	U of AZ	1	4	5
	U of AR	0	2	2
	UCSF	13	32	45
	U of Pacific	20	35	55
	USC	7	19	26
	U of CO	11	14	25
	U of Conn	1	2	3
	Howard DC	5	3	8
	FL A&M	2	3	5
	U of FL	4	3	7
	Mercer	2	3	5
	U of GA	0	2	2
	Idaho SU	1	0	1
	U of IL Chi	9	10	19
	Butler U	0	3	3
	Purdue	5	4	9
	Drake	1	2	3
	U of IA	1	4	5
	U of KS	2	2	4
	Xavier	1	2	3
	U of MD	4	6	10
	MA Col Pharm	11	11	22
	NE-MA	3	8	11
	Ferris	1	0	1
	U of MI	4	3	7
	Wayne SU	0	1	1
	U of MN	3	0	3
	U of MS	1	2	3
St. Louis Col of PH	6	4	10	
UMKC	1	1	2	
U of MT	2	1	3	

Creighton	9	2	11
U of NE	0	3	3
Rutgers	2	3	5
U of NM	1	2	3
Western	12	11	23
Midwestern U Chicago	13	7	20
A&M Schwartz	1	3	4
St. Johns	6	0	6
SUNY-Buff	4	2	6
Union U	8	6	14
UNC	3	0	3
ND SU	1	0	1
OH State U	2	3	5
U of Toledo	1	3	4
SW OK State	2	2	4
U of OK	3	2	5
OR State U	1	5	6
Duquesne	2	3	5
Phl C of Pharm	8	8	16
Temple	4	3	7
U of Pitt	0	3	3
U of RI	0	3	3
Med U of SC	0	1	1
U of TN	3	0	3
TX SO U	1	0	1
U of Hous	4	3	7
U of TX	2	2	4
U of UT	1	1	2
Med C of VA	0	5	5
U of WA	2	5	7
WA State U	1	6	7
WV U	0	2	2
U of WI-Mad	0	2	2
Campbell U	1	1	2
Nova Southeastern	5	3	8
Wilkes University	1	1	2
Texas Tech	1	2	3
Bernard J Dunn	5	6	11

Midwestern AZ	14	17	31
Nevada College of Pharm	13	15	28
Loma Linda U	7	14	21
UCSD	2	9	11
MA School of Pharm - Worcester	19	28	47
Palm Beach Atlantic University	3	1	4
Lake Erie Col	6	7	13
Touro U	6	18	24
U of Charleston	3	2	5
South U School of Pharm	1	2	3
Hampton U (VA)	0	3	3
Pac U of Or	0	10	10
Wingate U	2	3	5
U of Findlay	0	1	1
Sullivan U	8	9	17
Cal Northstate	8	10	18
Other/FG	42	60	102
U of HI - Hilo	7	13	20
Texas A&M	1	2	3
Thomas Jefferson U	3	0	3
Harding U	2	1	3
Husson U	3	0	3
Appalachian College of Pharm	2	1	3
Lipscomb U	1	0	1
Chicago St U	3	3	6
U of New England	11	7	18
Regis University	4	2	6
East Tennessee State U	0	1	1
Notre Dame of MD	1	3	4
St. John Fisher	2	0	2
Concordia U College of Pharm	1	0	1

Rosalind Franklin U	0	3	3
Western NE U	2	0	2
U of Saint Joseph	4	2	6
Roosevelt U	1	3	4
D'Youville	1	1	2
Touro New York	8	5	13
South College	2	9	11
Manchester U	2	2	4
SIUE	0	3	3
Fairleigh Dickinson	1	0	1
Cedarville U	0	1	1
U of the Sciences	0	2	2
Total	429	574	1003

Country

CPJE

		CPJE p/f		
		F	P	Total
country	Armenia	1	0	1
	Brazil	0	2	2
	Canada	0	2	2
	China	1	0	1
	E&W Germany	0	1	1
	Denmark	1	0	1
	Egypt	15	27	42
	Ethiopia	1	0	1
	Fiji	0	1	1
	France	1	1	2
	India	6	7	13
	Iraq	0	2	2
	Iran	0	1	1
	Italy	1	0	1
	Jordan	3	4	7
	Lebanon	0	1	1
	Netherlands	0	1	1
	Philippines	9	5	14
	Pakistan	1	1	2

Russia	1	1	2
Syria	1	1	2
Taiwan	0	1	1
Ukrainian	0	1	1
USA	387	514	901
Total	429	574	1003

Attachment 2



NABP
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February 10, 2017

Dear Member of Congress:

In light of the mission of the National Association of Boards of Pharmacy® (NABP®) to assist its member boards of pharmacy in protecting the public health, I write to express concern regarding any proposed federal legislation that would allow the dispensing of non-United States (US) Food and Drug Administration (FDA)-approved medicines to patients in the US from online pharmacies, including Canadian online pharmacies. Such action would put patients in this country at risk of harm from counterfeit or adulterated medicines.

About The National Association of Boards of Pharmacy

NABP is the independent, international, and impartial Association that assists its member boards and jurisdictions in developing, implementing, and enforcing uniform standards for the purpose of protecting the public health. NABP is the only professional association that represents the state boards of pharmacy in all 50 United States, the District of Columbia, Guam, Puerto Rico, the Virgin Islands, the Bahamas, New Zealand, and 10 Canadian provinces.

Nearly 20 Years of Experience With Online Pharmacies

Since 1999, NABP has been monitoring and reviewing internet pharmacy websites. The Association's efforts began that year with the establishment of the Verified Internet Pharmacy Practice Sites® (VIPPS®) program, which accredits US pharmacies that dispense prescription drugs via the internet. In 2004, NABP launched the Veterinary-VIPPS® program to accredit US pharmacies that dispense prescription veterinary drugs via the internet. In 2010, NABP launched the e-Advertiser Approval^{CM} Program, which identified internet advertisers that offer limited pharmacy services or other prescription drug-related services online. Most recently, in 2014 NABP launched the .Pharmacy Top Level Domain Program to provide an easier and more secure way for patients to identify legitimate online pharmacies and pharmacy-related resources. For more about NABP's programs, visit www.safe.pharmacy.

The Facts About Canadian Online Pharmacies

There are roughly 35,000 active online pharmacies. NABP has done substantial research on online pharmacies with the goal of understanding this vast marketplace in order to help keep patients safe. Since 2008, NABP has reviewed more than 11,000 websites selling prescription medications and determined that **96% of online pharmacy websites are operating illegally**, out of compliance with state and federal laws and/or NABP patient safety and pharmacy practice standards. In many instances, these sites are foreign drug sellers masquerading as Canadian online pharmacies but actually dispense medications that are approved by neither FDA nor Health Canada.

In NABP's nearly 20 years of experience, US consumers buying medications from Canadian online pharmacies rarely, if ever, receive the Health Canada-approved products afforded to Canadian customers. Instead, these Canadian pharmacy websites sell US patients medicines manufactured in places where buyers would not even drink the water, e.g., India, Turkey, or Southeast Asia. NABP and many other patient safety advocates have found that the dangers of drugs dispensed outside of FDA's or Health Canada's drug approval process are significant. Outside these closed and tightly regulated drug supply chains, the safeguards put in place to ensure the identity, efficacy, and safety of prescription medications no longer apply.

Why Congress Should Not Encourage US Consumers to Buy From Canadian Online Pharmacies

It is NABP's understanding that Congress is contemplating legislation that would amend the US Food, Drug, and Cosmetic Act to allow US consumers to buy Health Canada-approved medicines from "legitimate" Canadian online pharmacies. Based on our experience, for the following reasons NABP believes this action would have grave consequences.

1. Sending consumers online hoping they will find a safe site is a big gamble, and you would be playing with peoples' lives. Even finding a legitimate online pharmacy that sells **US FDA-approved** medicines to US consumers is tricky, given there are 35,000 active online pharmacies operating today and 96% of them violate applicable laws.
2. Further, **NABP is unaware of any Canadian online pharmacies that consistently dispense Health Canada-approved medicines to US consumers.** To put it bluntly, sending consumers online to look for Health Canada-approved medicines is reckless, as US patients are likely to receive unapproved, substandard, and counterfeit drugs from unknown foreign sources, posing a serious risk to patient safety.
3. **Even if** there were Canadian online pharmacies that consistently dispensed Health Canada-approved medicines to US patients (which is not the case today), how would a US consumer distinguish these sites from the thousands of other, dangerous sites selling counterfeit, adulterated, and unapproved products? Even with the full force of US law enforcement going after illegal sites, thousands of illegal online pharmacy websites based offshore would continue to dupe US consumers into believing they are buying from a "real" Canadian online pharmacy. Proscriptive statutes, enhanced penalties, and additional enforcement resources do nothing to protect US consumers from illegal foreign actors who blatantly disregard US laws and hide in jurisdictions that will not extradite criminals.

We appreciate your consideration of our comments and offer any assistance that NABP can provide. Please do not hesitate to contact me at ccatizone@nabp.pharmacy or contact our office at 847/391-4400 with feedback or questions.

Sincerely,

NATIONAL ASSOCIATION OF BOARDS OF
PHARMACY



Carmen A. Catizone, MS, RPh, DPh
Executive Director/Secretary