

# STATE OF NEW HAMPSHIRE

## Inter-Department Communication

**DATE:** April 6, 2022

**FROM:** Michael A. Morrell  
Acting Administrative Rules Director

**AT (OFFICE):** Legislative Services

**SUBJECT:** Final Proposal 2021-92 NH Pharmacy Board Standards of Practice

**To:** File

Attached are Kim Reeve's comments on Final Proposal 2021-92 from the NH Pharmacy Board (Board) regarding the adoption, repeal, readoption, and readoption with amendment of Ph 701.02, Ph 701.03, and Ph 702 through Ph 710 on standards of practice.

There are substantive comments is on pages 3, 4, 9, 10, 17, 20, and 28. In addition, there are notes to JLCAR on pages 4, 31, and 37. The substantive comments all relate to the public interest due to lack of clarity and several relate to legislative intent due to potential oral rulemaking in violation of RSA 541-A:22, I.

The notes to JLCAR relate to the intent of the repeal of Ph 702, Ph 709, and Ph 710.