

STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: June 7, 2022

FROM: Michael A. Morrell
Acting Administrative Rules Director

AT (OFFICE): Legislative Services

SUBJECT: Final Proposal 2021-129 NH Pharmacy Board Licensed Advanced Pharmacy Technicians

To: File

Attached are Christina Muñiz's comments on Final Proposal 2021-129 from the NH Pharmacy Board (Board) regarding the adoption of Ph 1800 on licensed advanced pharmacy technicians.

There are substantive comments on every page of this proposal. In addition, there are many editorial comments throughout. The substantive comments all relate to the public interest due to lack of clarity, some are in regard to forms that have not been submitted for Committee Staff review, and several relate to legislative intent due to potential oral rulemaking in violation of RSA 541-A:22, I.