

Office of Regulatory Management  
Economic Review Form

|                                                                    |                                                     |
|--------------------------------------------------------------------|-----------------------------------------------------|
| <b>Agency name</b>                                                 | Board of Pharmacy, Department of Health Professions |
| <b>Virginia Administrative Code (VAC) Chapter citation(s)</b>      | 18VAC110-20                                         |
| <b>VAC Chapter title(s)</b>                                        | Regulations Governing the Practice of Pharmacy      |
| <b>Action title</b>                                                | Amendment to clarify application of 18VAC110-20-735 |
| <b>Date this document prepared</b>                                 | July 17 <sup>th</sup> , 2023                        |
| <b>Regulatory Stage (including Issuance of Guidance Documents)</b> | Fast-Track                                          |

**Cost Benefit Analysis**

Complete Tables 1a and 1b for all regulatory actions. You do not need to complete Table 1c if the regulatory action is required by state statute or federal statute or regulation and leaves no discretion in its implementation.

Table 1a should provide analysis for the regulatory approach you are taking. Table 1b should provide analysis for the approach of leaving the current regulations intact (i.e., no further change is implemented). Table 1c should provide analysis for at least one alternative approach. You should not limit yourself to one alternative, however, and can add additional charts as needed.

Report both direct and indirect costs and benefits that can be monetized in Boxes 1 and 2. Report direct and indirect costs and benefits that cannot be monetized in Box 4. See the ORM Regulatory Economic Analysis Manual for additional guidance.

**Table 1a: Costs and Benefits of the Proposed Changes (Primary Option)**

|                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                            |
|----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | During the 2023 General Assembly session, Virginia Code § 54.1-3408(Y) was altered to amend training and instruction requirements when dispensing naloxone. This action clarifies in regulation that the training requirements only apply to the injectable formulation using a hypodermic needle or syringe dispensed by entities authorized in Virginia Code § 54.1-3408(Y) and does not include any costs or benefits associated with it. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs                                                                                                                                                                                                                                                                                                                                                                                                                      | Direct & Indirect Benefits |
|                                                    | (a) N/A                                                                                                                                                                                                                                                                                                                                                                                                                                      | (b) N/A                    |
| (3) Net Monetized Benefit                          | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                          |                            |
| (4) Other Costs & Benefits (Non-Monetized)         | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                          |                            |
| (5) Information Sources                            |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                            |

**Table 1b: Costs and Benefits under the Status Quo (No change to the regulation)**

|                                                    |                                                                                                                                                                           |                            |
|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There are no costs or benefits under the status quo. Effective July 1 of this year, injectable naloxone can be used, regardless of clarifying language in the regulation. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs                                                                                                                                                   | Direct & Indirect Benefits |
|                                                    | (a) N/A                                                                                                                                                                   | (b) N/A                    |
| (3) Net Monetized Benefit                          | N/A                                                                                                                                                                       |                            |
| (4) Other Costs & Benefits (Non-Monetized)         | N/A                                                                                                                                                                       |                            |
| (5) Information Sources                            |                                                                                                                                                                           |                            |

**Table 1c: Costs and Benefits under Alternative Approach(es)**

|                                                    |                                                  |                            |
|----------------------------------------------------|--------------------------------------------------|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There are no alternative approaches to consider. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs                          | Direct & Indirect Benefits |
|                                                    | (a) N/A                                          | (b) N/A                    |
| (3) Net Monetized Benefit                          | N/A                                              |                            |
| (4) Other Costs & Benefits (Non-Monetized)         | N/A                                              |                            |
| (5) Information Sources                            |                                                  |                            |

**Impact on Local Partners**

Use this chart to describe impacts on local partners. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

**Table 2: Impact on Local Partners**

|                                                    |                                       |                            |
|----------------------------------------------------|---------------------------------------|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There is no impact on local partners. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs               | Direct & Indirect Benefits |
|                                                    | (a) N/A                               | (b) N/A                    |
| (3) Other Costs & Benefits (Non-Monetized)         | N/A                                   |                            |
| (4) Assistance                                     |                                       |                            |
| (5) Information Sources                            |                                       |                            |

**Impacts on Families**

Use this chart to describe impacts on families. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

**Table 3: Impact on Families**

|                                                    |                                 |                            |
|----------------------------------------------------|---------------------------------|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There is no impact on families. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs         | Direct & Indirect Benefits |
|                                                    | (a) N/A                         | (b) N/A                    |
| (3) Other Costs & Benefits (Non-Monetized)         | N/A                             |                            |
| (4) Information Sources                            |                                 |                            |

**Impacts on Small Businesses**

Use this chart to describe impacts on small businesses. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

**Table 4: Impact on Small Businesses**

|                                                    |                                         |                            |
|----------------------------------------------------|-----------------------------------------|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There is no impact on small businesses. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs                 | Direct & Indirect Benefits |
|                                                    | (a) N/A                                 | (b) N/A                    |
| (3) Other Costs & Benefits (Non-Monetized)         | N/A                                     |                            |
| (4) Alternatives                                   | N/A                                     |                            |

|                         |  |
|-------------------------|--|
| (5) Information Sources |  |
|-------------------------|--|

**Changes to Number of Regulatory Requirements**

**Table 5: Regulatory Reduction**

For each individual action, please fill out the appropriate chart to reflect any change in regulatory requirements, costs, regulatory stringency, or the overall length of any guidance documents.

*Change in Regulatory Requirements*

| VAC Section(s) Involved | Initial Count | Additions | Subtractions | Net Change |
|-------------------------|---------------|-----------|--------------|------------|
| 18VAC110-20             | 993           | 0         | 0            | 0          |
|                         |               |           |              |            |

*Cost Reductions or Increases (if applicable)*

| VAC Section(s) Involved | Description of Regulatory Requirement | Initial Cost | New Cost | Overall Cost Savings/Increases |
|-------------------------|---------------------------------------|--------------|----------|--------------------------------|
|                         |                                       |              |          |                                |
|                         |                                       |              |          |                                |

*Other Decreases or Increases in Regulatory Stringency (if applicable)*

| VAC Section(s) Involved | Description of Regulatory Change | Overview of How It Reduces or Increases Regulatory Burden |
|-------------------------|----------------------------------|-----------------------------------------------------------|
|                         |                                  |                                                           |
|                         |                                  |                                                           |

*Length of Guidance Documents (only applicable if guidance document is being revised)*

| Title of Guidance Document | Original Length | New Length | Net Change in Length |
|----------------------------|-----------------|------------|----------------------|
|                            |                 |            |                      |
|                            |                 |            |                      |