



Virginia Department of Planning and Budget **Economic Impact Analysis**

18 VAC 110-21 Regulations Governing the Licensure of Pharmacists and Registration of Pharmacy Technicians

Board of Pharmacy

Town Hall Action/Stage: 6935/11055

April 17, 2026

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with § 2.2-4007.04 of the Code of Virginia (Code) and Executive Order 19. The analysis presented below represents DPB's best estimate of the potential economic impacts as of the date of this analysis.¹

Summary of the Proposed Amendments to Regulation

The Board of Pharmacy (Board) proposes to allow students of pharmacy to take the National Association of Boards of Pharmacy (NABP) examinations prior to graduation and to allow the Board to use NABP's exam eligibility service.

Background

Pharmacy students in Virginia must take two examinations offered by the NABP in order to qualify for licensure: the North American Pharmacist Licensure Examination (NAPLEX) and Multistate Pharmacy Jurisprudence Examination (MPJE). As an alternative to the MPJE, the NABP has also begun to offer a Uniform MPJE (UMPJE) examination, and Virginia students will have the option of taking the UMPJE effective October 1, 2026. Afterwards, Virginia students will no longer have the option to take the MPJE, but the date of this transition does not appear to have been determined at this time.²

¹ Code § 2.2-4007.04 requires that such economic impact analyses determine the public benefits and costs of the proposed amendments. Further the analysis should include but not be limited to: (1) the projected number of businesses or other entities to whom the proposed regulatory action would apply, (2) the identity of any localities and types of businesses or other entities particularly affected, (3) the projected number of persons and employment positions to be affected, (4) the projected costs to affected businesses or entities to implement or comply with the regulation, and (5) the impact on the use and value of private property.

² See <https://nabp.pharmacy/programs/examinations/mpje/uniform-mpje/participating-states/>.

Before taking the test, a student's eligibility to take the test must be confirmed. The NABP currently confirms a student's eligibility to test for residents of several states (Arizona, Colorado, District of Columbia, Kentucky, Louisiana, Maine, Nebraska, North Carolina, Oregon, Rhode Island, Utah, and Wisconsin). Residents of these jurisdictions must pay an additional \$85 fee during the application process. The NABP also confirms eligibility to test for the UMPJE for all participating jurisdictions; there is no separate fee for this. The eligibility review is valid for one year and includes retakes during that period.

After confirming eligibility to test, and ensuring all other application requirements are met, candidates may be approved to purchase the exam. After purchase, the student receives an Authorization to Test (ATT). In order to receive the ATT, NABP requires applicants for the NAPLEX or MPJE to submit an official transcript upon degree conferral.³ In 2024, an NABP task force was tasked with examining feasible options to expand access to the examination process, including allowing candidates to take the examinations prior to degree conferral.⁴ The task force conducted a pilot program in North Dakota and Wisconsin that allowed students to take the MPJE prior to graduation, and it appears that this option has been expanded to the jurisdictions where NABP confirms eligibility to test.⁵

The Board's regulation currently prohibits use of this option in Virginia. Subsection A of section 80 (Content of the examination and grades required; limitation on admittance to examination) of 18 VAC 110-21 requires that,

Prior to admission to any examination required for licensure, the applicant shall have met all other requirements to include education and practical experience requirements, but in no case shall the applicant be admitted if grounds exist to deny licensure under § 54.1-3316 of the Code of Virginia.

This language in subsection A has two important effects. First, it effectively prohibits students from taking the NABP examinations prior to graduation from a pharmacy program. Second, it also implicitly requires the Board to verify that each applicant has met the education and practical experience requirements and to ascertain that the applicant would not be denied

³ See <https://nabp.pharmacy/programs/examinations/naplex/#steps-to-apply> and <https://nabp.pharmacy/programs/examinations/mpje/how-to-apply/>.

⁴ See <https://nabp.pharmacy/wp-content/uploads/2024/12/Report-of-the-Task-Force-to-Assess-Expanding-Access-to-NABP-Competence-Assessment-Examinations.pdf>.

⁵ Because the pilot only included MPJE, the report states that eligibility review may include the NAPLEX if the student is applying up to six months in advance of the testing date.

licensure under Code § 54.1-3316. Thus, the current language in subsection A prevents the Board from utilizing NABP's eligibility verification service, because that service only considers compliance with education requirements. Thus, the Board seeks to strike subsection A so that students may (i) take one or both examinations before graduation, as allowed by NABP, and (ii) use the NABP's eligibility verification service.

A shift to using NABP's eligibility verification service is not expected to limit the Board's ability to refuse to issue a license or take disciplinary action, because Code § 54.1-3316 authorizes the Board to, "refuse to admit an applicant to any examination; refuse to issue a license, permit, certificate, or registration to any applicant; ..." for a list of specific violations.

Estimated Benefits and Costs

The proposed amendments would benefit pharmacy students by allowing them to take one or both of the required licensing examinations prior to graduating from a pharmacy program, thereby reducing the time it takes to obtain a pharmacist license and start working. The median annual wage for pharmacists in Virginia was \$137,470 in May 2024; for comparison, the median annual wage for pharmacy technicians was \$42,490.⁶ Assuming pharmacy graduates (pre-licensure) work as pharmacy interns performing similar work to pharmacy technicians for similar pay, they could reasonably expect a significant salary increase once they become licensed, even if their starting salary is below the median for pharmacists. Thus, reducing the time taken to obtain a license even by a few months could have a significant monetary benefit to pharmacy students seeking licensure.

The proposed amendments would also implicitly require pharmacy students to pay a new \$85 fee for NABP's eligibility verification service; this fee would cover both the NAPLEX and MPJE for up to one year and includes any retakes within that one-year period. This fee would be additional to the examination application fees. However, the Board reports that once Virginia adopts the UMPJE, which is expected to occur this fall, the application fees will cover all eligibility processing, for both the UMPJE and NAPLEX exams, and include any retakes within a one-year period. However, the exam application fee may be higher to reflect the inclusion of the eligibility verification service.

⁶ Data source: U.S. Bureau of Labor Statistics' Occupational Employment and Wage Statistics; May 2024 is the most recently available data. <https://data.bls.gov/oes/#/home>.

Lastly, the proposed amendments would reduce administrative burden for the Board by no longer having to verify applicants' eligibility to take the NABP examinations.

Businesses and Other Entities Affected

As described previously, the proposed amendments would largely benefit pharmacy students seeking licensure as pharmacists; however, it would also create a new cost, at least temporarily. In 2025, 869 new pharmacist licenses were issued, of which approximately 250 were Virginia students.⁷

The Code of Virginia requires DPB to assess whether an adverse impact may result from the proposed regulation.⁸ An adverse impact is indicated if there is any increase in net cost or reduction in net benefit for any entity, even if the benefits exceed the costs for all entities combined.⁹ Because the proposed changes would require students to pay a new \$85 fee to NABP for verifying examination eligibility, an adverse impact is indicated. However, it should be noted that this service will be included in the application fee for the UMPJE effective October 1, 2026, and that the MPJE will be retired eventually.

Small Businesses¹⁰ Affected:¹¹

The proposed changes would not adversely impact small businesses.

⁷ Source: <https://www.dhp.virginia.gov/about/stats/2026Q3/05NewLicenseCountQ3FY2026.pdf>.

⁸ Pursuant to Code § 2.2-4007.04(D): In the event this economic impact analysis reveals that the proposed regulation would have an adverse economic impact on businesses or would impose a significant adverse economic impact on a locality, business, or entity particularly affected, the Department of Planning and Budget shall advise the Joint Commission on Administrative Rules, the House Committee on Appropriations, and the Senate Committee on Finance.

⁹ Statute does not define "adverse impact," state whether only Virginia entities should be considered, nor indicate whether an adverse impact results from regulatory requirements mandated by legislation. As a result, DPB has adopted a definition of adverse impact that assesses changes in net costs and benefits for each affected Virginia entity that directly results from discretionary changes to the regulation.

¹⁰ Pursuant to § 2.2-4007.04 of the Code of Virginia, small business is defined as "a business entity, including its affiliates, that (i) is independently owned and operated and (ii) employs fewer than 500 full-time employees or has gross annual sales of less than \$6 million."

¹¹ If the proposed regulatory action may have an adverse effect on small businesses, Code § 2.2-4007.04 requires that such economic impact analyses include: (1) an identification and estimate of the number of small businesses subject to the proposed regulation, (2) the projected reporting, recordkeeping, and other administrative costs required for small businesses to comply with the proposed regulation, including the type of professional skills necessary for preparing required reports and other documents, (3) a statement of the probable effect of the proposed regulation on affected small businesses, and (4) a description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation. Additionally, pursuant to Code § 2.2-4007.1, if there is a finding that a proposed regulation may have an adverse impact on small business, the Joint Commission on Administrative Rules shall be notified.

Localities¹² Affected¹³

No locality would be disproportionately affected. Local governments would not be affected.

Projected Impact on Employment

Although the proposed changes would reduce the time taken for pharmacy students to receive their license, this impact is unlikely to attract more individuals to pursue an education and career as a pharmacist or affect employment rates for licensed pharmacists.

Effects on the Use and Value of Private Property

The proposed amendments are not expected to substantively affect the use or value of private property. Real estate development costs would not be affected.

¹² “Locality” can refer to either local governments or the locations in the Commonwealth where the activities relevant to the regulatory change are most likely to occur.

¹³ § 2.2-4007.04 defines “particularly affected” as bearing disproportionate material impact.