February 8, 2024

Dear MA Board of Registration in Pharmacy:

Thank you for the opportunity to submit comments regarding 801 CMR 4.00: Rates.

I do not see a fee listed for the nuclear pharmacist license which I hope means that there will no longer be an additional fee for nuclear pharmacists. It’s the only specialty in pharmacy that requires pharmacists to obtain an additional license for the specialty and pay an additional fee. Compounding, immunization, and collaborative practice pharmacists all require additional training and education but do not require a separate license. I do not think there should be an additional license fee for the nuclear pharmacist license.

The [MA Department of Public Health Radiation Control Program](https://www.mass.gov/doc/105-cmr-120500-120594-use-of-radionuclides-in-the-healing-arts-0/download) 105 CMR 120.526 prescribes the training and education for an Authorized Nuclear Pharmacist in the state and requires Authorized Nuclear Pharmacists to be listed on the Radioactive Materials License with the MA DPH Radiation Control Program. I think it’s redundant and unnecessary for the Board of Pharmacy to check the training and education of these individuals especially when the Radiation Control Program is better suited to evaluate these documents.

I have been working as a licensed nuclear pharmacist in the Commonwealth for over 26 years. Please note these comments are my own and do not represent my employer or any other organization.

Thank you for allowing me to participate in this process. Please feel free to contact me with any questions.

Respectfully submitted,

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