| # | Section | Commenter | Comment | Staff Recommendations |
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| **1** | General | Jared Sewall | The commenter thanks the Board for accepting and taking actionable steps on the Reg 16 CCR 1769, making proposed modifications to Fee Schedule. The revision from the September 17th meeting seems to better reflect a more moderate approach to Facility License Fee's verse the original version and proposed text. | Board staff thank the commenter for their comment in support of the proposed amendments to the regulation. Board staff also note that while the commenter referenced "Reg 16 CCR 1769", believes they are referencing CCR title 16 section 1749. |
| **2** | General | Jared Sewall | Having a moderate fee structure increase (although may seem pointless if you're doing less frequent higher bumps) helps allows Facilities and Pharmacies maintain access and not have to impose large changes to patients they serve. Large fee increases in my experience are deterrents to all business types, and often result in large disruptions. A business can increase fees and costs and/or perform | Board staff thank the commenter for their comment and do not recommend any amendments to the proposed text as the comment appears general in nature and does not request any specific amendment to the modified text. |

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| | | | cost savings with more smaller moderate changes versus large expenses. As the Board continues on this path, please keep this moderate mindset in mind for fee increases. | |
| **3** | General | Alireza Alibanaei, Pharm.D. on behalf of Gold Coast Pharmacy | The commenter appreciates the Board's decision to reduce the proposed initial non-government-owned pharmacy license fee from $2,000 to $1,250 and the proposed annual renewal fee from $1,500 to $1,395. These modifications are a meaningful improvement over the original proposal. | Board staff thank the commenter for their comment in support of the proposed amendments to the regulation. |
| **4** | General | Alireza Alibanaei, Pharm.D. on behalf of Gold Coast Pharmacy | However, the modified annual renewal fee for non-government-owned pharmacy license still represents an increase from the current $1,025 to $1,395, or approximately 36 percent. For independent community | Board staff have reviewed the comment and do not recommend any changes to the text. In response to comments received during the initial 45-day comment period and based on the modest increase in revenue received in fiscal year 2025/26, the Board already proposed a reduction of certain fees to the extent possible, as reflected in the modified text, including the application and renewal fee for pharmacies (including independent pharmacies). |

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| | | | pharmacies already operating under significant financial pressure, cumulative increases in regulatory and operating costs remain a serious concern. Commenter encourages the Board to consider whether the annual renewal fee can be further moderated or phased in over time, particularly for independent community pharmacies and other small pharmacy businesses. | |
| ***5*** | General | Alireza Alibanaei, Pharm.D. on behalf of Gold Coast Pharmacy | As the commenter noted in their previous comments, maintaining a financially sustainable community pharmacy network is itself important to protecting patient access and public health. Commenter appreciates the Board's consideration of the economic impact | Board staff thank the commenter for their comment and do not recommend any amendments to the proposed text as the comment appears general in nature and does not request any specific amendment to the modified text. |

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| **6** | General | Gerry Kataoka | Please do not raise fees for Pharmacists. Commenter is mostly retired, but likes to work a few days each month. $500 is too much, along with malpractice insurance. | The Board thank the commenter for their comment and do not recommend any amendments to the proposed text in response thereto. Staff is aligned with the position of the commenter and note that the regulation proposal does not seek to raise fees for pharmacists. |
| **7** | General | Scott Brunner, CAE on behalf of Alliance for Pharmacy Compounding | Commenter appreciates the Board's consideration of stakeholder concerns and its decision to reduce certain proposed renewal fees. In particular, the modified text reduces the proposed annual renewal fee for a nonresident sterile compounding pharmacy from $17,040 to $15,000 and the proposed annual renewal fee for a nonresident outsourcing facility from $46,353 to $37,500. These modifications are meaningful, and commenter appreciates the Board's efforts to reduce the financial impact on these licensees. | Board staff thank the commenter for their comment and do not recommend any amendments to the proposed text in response thereto as the commenter is not requesting any specific amendment to the modified text. |
| **8** | General | Scott Brunner, CAE on behalf of | At the same time, the modified fees continue to | Board staff have reviewed the comment and do not recommend any changes to the text. In response to comments |

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| | | Alliance for Pharmacy Compounding | represent substantial increases over current renewal costs. The $15,000 renewal fee for a nonresident sterile compounding pharmacy remains a significant increase from the current $8,500 fee, while the $37,500 renewal fee for a nonresident outsourcing facility remains substantially higher than the current $28,500 fee. Commenter respectfully encourages the Board to continue considering the impact these modified renewal fees may have on non-resident facilities maintaining California licensure and, consequently, on their ability to continue serving California patients and healthcare facilities. | received during the initial 45-day comment period and based on the modest increase in revenue received in fiscal year 2025/26, the Board already proposed a reduction of certain fees to the extent possible, as reflected in the modified text, including the renewal fees for nonresident sterile compounding pharmacies and nonresident outsourcing facilities. |