From: Jared Sewall
To: PharmacyRulemaking@DCA
Subject: Re: NOTICE OF AVAILABILITY OF MODIFIED TEXT OF PROPOSED REGULATORY ACTION: Fee Schedule
Date: Thursday, September 17, 2026 11:26:33 AM
Attachments: image004.png

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Hi Brianna,

I wanted to write in a public comment regarding Sept 17 Revisions to Reg 16 CCR 1769 regarding Fee Scheule updates for 7/1.

"Dear Board Of Pharmacy,

Thank you for accepting and taking actionable steps on the Reg 16 CCR 1769, making proposed modifications to Fee Schedule. The revisions from Sept 17th meeting seem to better reflect a more moderate approach to Facility License Fee's vs their original version and proposed text.

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 & costs and/or perform 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.

Take Care,

-Jared"

Thank you Brianna

-Jared

On Thu, Sep 17, 2026 at 10:53 AM Damoth, Debbie@DCA <Debbie.Damoth@dca.ca.gov> wrote:

> **TITLE 16. PROFESSIONAL AND VOCATIONAL REGULATIONS**
>
> **DIVISION 17.**

BOARD OF PHARMACY

DEPARTMENT OF CONSUMER AFFAIRS

NOTICE OF AVAILABILITY OF MODIFIED TEXT

OF PROPOSED REGULATORY ACTION:

Fee Schedule

NOTICE IS HEREBY GIVEN that the Board of Pharmacy (hereafter Board) has proposed modifications made to proposed regulation 16 CCR section 1749, related to Fee Schedule. These regulations were originally noticed on July 31, 2026, and approved as modified by the Board at its September 17, 2026, meeting.

Materials regarding this proposal can be found at https://www.pharmacy.ca.gov/laws_regs/pending_regs.shtml or by requesting them from the Contact Person identified below.

Any person who wishes to comment on the proposed modifications may do so by submitting written comments between September 17, 2026 and October 2, 2026 to the following:

Contact Name: Brianna Fujimoto

Address: Board of Pharmacy

2720 Gateway Oaks Drive, Ste. 100

Sacramento, CA 95833

Fax number: 916-574-8618

Email Address: PharmacyRulemaking@dca.ca.gov

Please note, comments should be restricted to the most recent modifications made to the proposed regulations. Added text is indicated with a double underline. Deleted text is indicated by double strikethrough. The Board is not required to respond to comments on other aspects of the proposed regulations received in response to this notice.

Any comments previously submitted remain in the rulemaking file and will be

responded to by the Board's staff as part of the Final Statement of Reasons. All written comments received by **October 2, 2026**, that pertain to these modifications will be reviewed and responded to by the Board's staff as part of the compilation of the rulemaking file.

Debbie Damoth, Senior Administration and Regulations Manager
Pronouns: She/Her

California State Board of Pharmacy
(916) 518-3090 | FAX (916) 574-8614 | www.pharmacy.ca.gov

Be Aware and Take Care: Talk to your Pharmacist!



From: GOLDCOASTPHARMACY2020@GMAIL.COM
To: PharmacyRulemaking@DCA
Subject: COMMENT ON MODIFIED TEXT — 16 CCR § 1749 FEE SCHEDULE
Date: Thursday, September 17, 2026 11:43:57 AM

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Dear Ms. Fujimoto,

Thank you for the opportunity to comment on the modified text of the proposed amendments to 16 CCR section 1749.

I appreciate 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.

However, the modified annual renewal fee still represents an increase from the current $1,025 to $1,395, or approximately 36 percent. For independent community pharmacies already operating under significant financial pressure, cumulative increases in regulatory and operating costs remain a serious concern.

I respectfully encourage 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.

As I noted in my previous comments, maintaining a financially sustainable community pharmacy network is itself important to protecting patient access and public health. I appreciate the Board's consideration of the economic impact on licensees reflected in these modifications.

Thank you for your consideration.

Sincerely,
Alireza Alibanaei, Pharm.D.
Pharmacy Owner

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From: Gerry KATAOKA
To: PharmacyRulemaking@DCA
Subject: Please do not raise fees for Pharmacists. I am mostly retired, but like to work a few days each month. $500 is too much, along with malpractice insurance.
Date: Thursday, September 17, 2026 3:54:02 PM

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Thank you,

G Kataoka

100 Daingerfield Road, Suite 100
Alexandria, VA 22314

www.a4pc.org

Alliance for Pharmacy Compounding

Compounding the Joy of Living®

September 29, 2026

Brianna Fujimoto
California State Board of Pharmacy
2720 Gateway Oaks Drive, Suite 100
Sacramento, CA 95833

Re: Modified Text – Proposed Amendment to 16 CCR § 1749 – Fee Schedule

Dear Ms. Fujimoto:

On behalf of the Alliance for Pharmacy Compounding, we respectfully submit these comments in response to the Board's recently modified text for proposed amendments to 16 CCR § 1749.

APC 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 we appreciate the Board's efforts to reduce the financial impact on these licensees.

At the same time, the modified fees continue to 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.

APC 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.

We appreciate the Board's consideration of APC's prior comments, which remain part of the rulemaking record, as well as the opportunity to respond specifically to these recent modifications.

Thank you for your consideration.

Sincerely,

Scott Brunner, CAE
Chief Executive Officer
Alliance for Pharmacy Compounding