Michigan Office of Administrative Hearings and Rules
Administrative Rules Division (ARD)
MOAHR-Rules@michigan.gov

REGULATORY IMPACT STATEMENT and COST-BENEFIT ANALYSIS (RIS)

Agency Information:
Department name:
Licensing and Regulatory Affairs
Bureau name:
Bureau of Professional Licensing
Name of person filling out RIS:
Jennifer Shaltry
Phone number of person filling out RIS:
517-241-3085
E-mail of person filling out RIS:
ShaltryJ1@michigan.gov

Rule Set Information:
ARD assigned rule set number:
2024-29 LR
Title of proposed rule set:
Pharmacy - Pharmacist Continuing Education

Comparison of Rule(s) to Federal/State/Association Standard

1. Compare the proposed rules to parallel federal rules or standards set by a state or national licensing agency or accreditation association, if any exist.

Each state establishes its own requirements with respect to continuing education for pharmacists, so there are no federal rules or standards set by a state or national licensing agency or accreditation association that the proposed rules can exceed.

A. Are these rules required by state law or federal mandate?

The rules are not federally mandated. The following state laws require rules:

MCL 333.16148 requires training standards for identifying victims of human trafficking.

MCL 333.16204 states that if a board requires completion of continuing education as a condition for renewal, it shall require an appropriate number of hours or courses in pain and symptom management.

MCL 333.17731 mandates rules requiring each applicant for license renewal to complete as part of the continuing education or proficiency examination requirement an appropriate number of hours or courses in pain and symptom management.

B. If these rules exceed a federal standard, please identify the federal standard or citation, describe why it is necessary that the proposed rules exceed the federal standard or law, and specify the costs and benefits arising out of the deviation.

The proposed rules do not exceed federal standards.

2. Compare the proposed rules to standards in similarly situated states, based on geographic location, topography, natural resources, commonalities, or economic similarities.

Each state is responsible for implementing its own laws and rules pertaining to continuing education for pharmacists. Like other Great Lakes states, Michigan's rules require 30 hours of continuing education per 2-year license renewal cycle. Illinois, Indiana, Ohio, Minnesota, Pennsylvania, and Wisconsin all require 30 hours of continuing education per 2-year renewal cycle. New York requires 45 hours of continuing education per 3-year renewal cycle.

Continuing Education Waiver

The proposed rules include a requirement that waiver requests be submitted not less than 30 days before the last regularly scheduled board meeting before the expiration date of the license. Illinois requires waiver requests to be submitted with the license renewal application. Indiana does not specify a deadline by which waiver requests must be submitted prior to the license expiration date. Minnesota, New York, Ohio, and Pennsylvania have processes for granting continuing education extensions, but not waivers.

Continuing Education Sponsor Approved by a Non-Pharmacy Healthcare Board or Accreditation Entity.

The proposed rules would permit up to 5 continuing education hours per renewal cycle to be earned through activities provided by a sponsor approved by a non-pharmacy healthcare board or accreditation entity.

Illinois accepts only courses offered by providers approved by the Accreditation Council of Pharmacy (ACPE) or undergraduate coursework through a recognized college or approved school of pharmacy. Ohio accepts continuing education credits from ACPE-accredited providers, in-state approved providers of pharmacy jurisprudence continuing education, and in-state approved providers of volunteer healthcare services. Indiana, Minnesota and New York have review processes for continuing education sponsors that may permit a non-pharmacy healthcare board or accreditation entity to be approved. Pennsylvania accepts continuing education offered by ACPE-accredited providers of continuing pharmaceutical education targeted toward pharmacists or board-approved providers who have shown program accreditation substantially similar to ACPE accreditation. Wisconsin accepts continuing education offered by ACPE-accredited providers or other board approved programs. However, Wisconsin's board has not approved any programs other than those offered by ACPE-accredited providers as of August 9, 1999.

Meeting Attendance Verification for Continuing Education Credit

The current rules provide that up to 5 continuing education hours may be earned through attendance at board of pharmacy, disciplinary subcommittee, or rules committee work group meetings. The current rules do not specify whether the licensee must attend in-person or virtually; however, rules committee work group meetings are only held virtually. The proposed rules provide for verification of meeting attendance via a paper form for in-person attendance or an electronic confirmation for virtual attendance.

No other Great Lakes states give credit for attending board of pharmacy meetings, disciplinary subcommittee meetings, or rules committee work group meetings. Florida, California, and Alabama provide credit for board meeting attendance. Florida permits pharmacists to earn up to 10 hours per biennium for in-person attendance. California permits up to 6 hours per 2-year renewal cycle for in-person attendance of board meetings and committee meetings. Alabama permits up to 3 live hours per year for in-person or virtual board meeting attendance.

A. If the rules exceed standards in those states, please explain why and specify the costs and benefits arising out of the deviation.

The proposed rules do not exceed standards in other Great Lakes states.

3. Identify any laws, rules, and other legal requirements that may duplicate, overlap, or conflict with the proposed rules.

R 338.3135 of the Pharmacy – Controlled Substances rules requires applicants for renewal of a controlled substance license to complete a training in opioids and other controlled substances awareness with each renewal cycle. To avoid confusion, the proposed rules remove "1-time" in reference to the training required under the Pharmacy - Controlled Substances rules.

A. Explain how the rules have been coordinated, to the extent practicable, with other federal, state, and local laws applicable to the same activity or subject matter. This section should include a discussion of the efforts undertaken by the agency to avoid or minimize duplication.

The proposed rules include the removal of "1-time" in reference to the training in opioid and controlled substances awareness because that training is currently required for every controlled substance license renewal cycle under the Pharmacy – Controlled Substances rules. The proposed rules permit the opioid and controlled substances awareness training to count toward the continuing education requirements for renewal of a pharmacist license.

Purpose and Objectives of the Rule(s)

4. Identify the behavior and frequency of behavior that the proposed rules are designed to alter.

The rules are designed to specify the continuing education requirements necessary to renew a pharmacist license. The specific topics the proposed rules address, and the purpose of the proposed rules are set forth below:

R 338.3041. This rule contains definitions. The rule revision adds acronyms for two accrediting organizations to improve ease of reading.

R 338.3042. This rule sets forth the continuing education requirements for renewal of a pharmacist license or special volunteer pharmacist license. The proposed changes to this rule include: removing the date when human trafficking training became necessary for license renewal because it is no longer needed; removing "1-time" in reference to the training in opioid and controlled substances awareness because the training is currently required for every renewal cycle under R 338.3135 of the Pharmacy – Controlled Substances rules; and adding a requirement that waiver requests be submitted not less than 30 days before the last regularly scheduled board meeting before the expiration date of the license.

R 338.3044. This rule sets forth the acceptable continuing education activities for licensees. The rule revision permits up to 5 hours of continuing education credit for completion of a course or program offered by a continuing education sponsoring organization, institution, or individual approved by a non-pharmacy healthcare board or accreditation entity. The rule revision also provides a process for a licensee to obtain proof of attendance at a board of pharmacy meeting, disciplinary subcommittee meeting, or rules committee work group meeting.

A. Estimate the change in the frequency of the targeted behavior expected from the proposed rules.

The proposed rules do not change the number of continuing education hours required to renew a pharmacist license. The clarifications in the proposed rules are expected to make compliance easier for licensees rather than changing the frequency with which licensees engage in continuing education.

B. Describe the difference between current behavior/practice and desired behavior/practice.

Under the current R 338.3042, the reference to the opioid and controlled substance awareness training as "1-time" may confuse pharmacists who also hold controlled substance licenses because R 338.3135 of the Pharmacy – Controlled Substances rules requires the training for each renewal of a controlled substance license. Also, under the current R 338.3042, the deadline to submit a request for a continuing education waiver is not specified. This may result in a licensee submitting a waiver request without sufficient time for the board to consider the request before the license expires. The desired practice is to eliminate confusion for licensees and provide adequate time for the board to review continuing education waiver requests before a pharmacist license expires.

Under the current R 338.3044, continuing education provided by a continuing education sponsoring organization, institution, or individual approved by a non-pharmacy healthcare board or accreditation entity is not accepted. Also, there is no process specified by which a licensee my prove attendance at a board meeting, disciplinary subcommittee meeting, or rules committee work group meeting for continuing education credit. The desired practice is to permit up to 5 continuing education hours to be earned through activities provided by a continuing education sponsoring organization, institution, or individual approved by a non-pharmacy healthcare board or accreditation entity and to provide a process by which licensees can prove their attendance at a board meeting, disciplinary subcommittee meeting, or rules committee work group meeting.

C. What is the desired outcome?

The desired outcome is to improve and clarify the rules so licensees find compliance easier. This should result in fewer questions, fewer regulatory problems, and greater safety and protection of the public.

5. Identify the harm resulting from the behavior that the proposed rules are designed to alter and the likelihood that the harm will occur in the absence of the rule.

Outdated rules create conflict and confusion for pharmacists. The proposed rules update the previously adopted rules. Changes made specifically address the following:

R 338.3041. This rule contains definitions. The rule revision adds acronyms for two accrediting organizations to improve ease of reading.

R 338.3042. This rule sets forth the continuing education requirements for renewal of a pharmacist license or special volunteer pharmacist license. The proposed changes to this rule include: removing the date when human trafficking training became necessary for license renewal because it is no longer needed; removing "1-time" in reference to the training in opioid and controlled substances awareness because the training is currently required for every renewal cycle under R 338.3135 of the Pharmacy – Controlled Substances rules; and adding a requirement that waiver requests be submitted not less than 30 days before the last regularly scheduled board meeting before the expiration date of the license. If this rule is not updated, pharmacists will become confused about how frequently the opioid and controlled substances awareness training is required and how much time must be allowed for the board render a decision on a continuing education waiver request.

R 338.3044. This rule sets forth the acceptable continuing education activities for licensees. The rule revision permits up to 5 hours of continuing education credit for completion of a course or program offered by a continuing education sponsoring organization, institution, or individual approved by a non-pharmacy healthcare board or accreditation entity. The rule revision also provides a process for a licensee to obtain proof of attendance at a board of pharmacy meeting, disciplinary subcommittee meeting, or rules committee work group meeting. If the rule is not updated, pharmacists will not be able to earn continuing education delivered by a sponsor approved by a non-pharmacy healthcare board or accreditation entity, and they will not have a clear process for proving attendance at a board of pharmacy meeting, disciplinary subcommittee meeting, or rules committee workgroup meeting in order to establish continuing education credit.

A. What is the rationale for changing the rules instead of leaving them as currently written?

The proposed rule set supplies clarity regarding continuing education requirements for the renewal of a pharmacist license.

6. Describe how the proposed rules protect the health, safety, and welfare of Michigan citizens while promoting a regulatory environment in Michigan that is the least burdensome alternative for those required to comply.

To protect the health, safety, and welfare of Michigan's citizens, it is important that pharmacists adhere to educational and professional standards. The rules ensure that pharmacists maintain their competence to practice by establishing minimum continuing education requirements for license renewal. There is no less burdensome way to ensure that pharmacists satisfy minimum continuing education requirements for practice.

7. Describe any rules in the affected rule set that are obsolete or unnecessary and can be rescinded.

There are no rules in this rule set that are obsolete or unnecessary and can be rescinded.

Fiscal Impact on the Agency

Fiscal impact is an increase or decrease in expenditures from the current level of expenditures, i.e. hiring additional staff, higher contract costs, programming costs, changes in reimbursements rates, etc. over and above what is currently expended for that function. It does not include more intangible costs for benefits, such as opportunity costs, the value of time saved or lost, etc., unless those issues result in a measurable impact on expenditures.

8. Please provide the fiscal impact on the agency (an estimate of the cost of rule imposition or potential savings for the agency promulgating the rule).

The proposed rules are not expected to have a fiscal impact on the agency.

9. Describe whether or not an agency appropriation has been made or a funding source provided for any expenditures associated with the proposed rules.

No agency appropriation has been made nor has a funding source been provided for expenditures associated with the proposed rules.

10. Describe how the proposed rules are necessary and suitable to accomplish their purpose, in relationship to the burden(s) the rules place on individuals. Burdens may include fiscal or administrative burdens, or duplicative acts.

The proposed rule changes are necessary to update the set for improved clarity and ease of reading, remove the confusing language stating that the opioid and controlled substance awareness training is "1-time", provide a clear deadline for continuing education waiver requests, expand the acceptable continuing education activities to include up to 5 hours provided by sponsors approved by a non-pharmacy healthcare board or accreditation entity, and provide a process for licensees to receive continuing education credit for attendance at board of pharmacy, disciplinary subcommittee, and rules committee work group meetings.

A. Despite the identified burden(s), identify how the requirements in the rules are still needed and reasonable compared to the burdens.

The changes do not create any additional burden, fiscal or administrative, on the licensees.

Impact on Other State or Local Governmental Units

11. Estimate any increase or decrease in revenues to other state or local governmental units (i.e. cities, counties, school districts) as a result of the rule. Estimate the cost increases or reductions for other state or local governmental units (i.e. cities, counties, school districts) as a result of the rule. Include the cost of equipment, supplies, labor, and increased administrative costs in both the initial imposition of the rule and any ongoing monitoring.

There are no anticipated increases or decreases in revenues, cost increases or reductions, to other state or local government units as a result of the proposed rules.

12. Discuss any program, service, duty, or responsibility imposed upon any city, county, town, village, or school district by the rules.

There are no anticipated or intended programs, services, duties, or responsibilities imposed on any city, county, town, village, or school district as a result of the proposed rules.

A. Describe any actions that governmental units must take to be in compliance with the rules. This section should include items such as record keeping and reporting requirements or changing operational practices.

There are no actions that governmental units must take to comply with the proposed rules.

13. Describe whether or not an appropriation to state or local governmental units has been made or a funding source provided for any additional expenditures associated with the proposed rules.

No appropriations have been made to any governmental units as a result of these rules. No additional expenditures are anticipated or intended with the proposed rules.

Rural Impact

14. In general, what impact will the rules have on rural areas?

The proposed rules are not expected to impact rural areas. The proposed rules apply to licensed pharmacists, regardless of their location.

A. Describe the types of public or private interests in rural areas that will be affected by the rules.

The proposed rules are not expected to impact public or private interests in rural areas. The proposed rules apply to licensed pharmacists, regardless of their location.

Environmental Impact

15. Do the proposed rules have any impact on the environment? If yes, please explain.

No, the rules will not have an impact on the environment.

Small Business Impact Statement

16. Describe whether and how the agency considered exempting small businesses from the proposed rules.

The proposed rules impose requirements on individual licensees rather than small businesses. Even if a licensee's practice qualifies as a small business, the department could not exempt the licensee's business because it would create a disparity in the regulation of the profession.

17. If small businesses are not exempt, describe (a) the manner in which the agency reduced the economic impact of the proposed rules on small businesses, including a detailed recitation of the efforts of the agency to comply with the mandate to reduce the disproportionate impact of the rules upon small businesses as described below (in accordance with MCL 24.240(1)(a-d)), or (b) the reasons such a reduction was not lawful or feasible.

The proposed rules cannot exempt small businesses because the rules do not directly regulate small businesses, they regulate individual licensees.

While licensees may practice independently or as part of a small business, the law does not allow the rules to exempt these individuals from the requirements of the rules.

A. Identify and estimate the number of small businesses affected by the proposed rules and the probable effect on small businesses.

As of May 19, 2025, there are approximately 18,058 licensed pharmacists and 6 licensed special volunteer pharmacists in Michigan. Pharmacists practice in different work environments. No matter what type of business environment the licensee works in, the licensee will have to take the necessary steps to comply with the proposed rules. The rules do not affect small businesses differently. The anticipated effects on licensees are minimal because they clarify what is already required of licensees and not of the business in which they may work.

B. Describe how the agency established differing compliance or reporting requirements or timetables for small businesses under the rules after projecting the required reporting, record-keeping, and other administrative costs.

Because the proposed rules pertain to individuals and not businesses, they do not have differing compliance or reporting requirements or timetables for small businesses.

C. Describe how the agency consolidated or simplified the compliance and reporting requirements for small businesses and identify the skills necessary to comply with the reporting requirements.

The proposed rules do not impose any compliance requirements or reporting requirements for small businesses.

D. Describe how the agency established performance standards to replace design or operation standards required by the proposed rules.

The agency did not establish performance standards to replace design or operation standards required by the proposed rules.

18. Identify any disproportionate impact the proposed rules may have on small businesses because of their size or geographic location.

The proposed rules affect individual licensees rather than small businesses. Therefore, there is no disproportionate effect on small businesses because of their size or geographic location.

19. Identify the nature of any report and the estimated cost of its preparation by small businesses required to comply with the proposed rules.

A small business is not required to prepare any report under the proposed rules, so it is estimated that a small business will incur no cost in preparing a report to comply with the proposed rules.

20. Analyze the costs of compliance for all small businesses affected by the proposed rules, including costs of equipment, supplies, labor, and increased administrative costs.

There are no expected increased costs for small businesses concerning the costs of equipment, supplies, labor, or administrative costs.

21. Identify the nature and estimated cost of any legal, consulting, or accounting services that small businesses would incur in complying with the proposed rules.

There are no expected increased costs for small businesses concerning legal, consulting, or accounting services.

22. Estimate the ability of small businesses to absorb the costs without suffering economic harm and without adversely affecting competition in the marketplace.

There are no expected costs to small businesses that will cause economic harm to a small business or the marketplace as a result of the proposed rules.

23. Estimate the cost, if any, to the agency of administering or enforcing a rule that exempts or sets lesser standards for compliance by small businesses.

If a rule exempted or set lesser standards for compliance by a small business, there would be no cost to the agency for administering or enforcing that rule because the rules do not apply to a business of any size. The rules apply to individuals practicing in Michigan as pharmacists.

24. Identify the impact on the public interest of exempting or setting lesser standards of compliance for small businesses.

If the department could exempt or set lesser standards for pharmacists working in small businesses, it would create a disparity in the regulation of the profession and have a negative impact on public safety.

25. Describe whether and how the agency has involved small businesses in the development of the proposed rules.

The department worked with stakeholders at the Michigan Board of Pharmacy Rules Committee Work Group meeting, which included members of the Board of Pharmacy, department staff, and members of the public in the development of the proposed rules. The board is composed of members of the profession and members of the public who may work in small businesses in Michigan. However, even if the Board members work in small businesses, they were not involved in the development of the rules as representatives of small businesses.

A. If small businesses were involved in the development of the rules, please identify the business(es).

Representatives from businesses were involved in the development of the rules. However, the department is not aware if they meet the definition of a "small business."

Cost-Benefit Analysis of Rules (independent of statutory impact)

26. Estimate the actual statewide compliance costs of the rule amendments on businesses or groups.

There are no estimated compliance costs with these rule amendments on businesses or groups.

A. Identify the businesses or groups who will be directly affected by, bear the cost of, or directly benefit from the proposed rules.

The proposed rules directly affect licensees. Licensees bear the cost of, and directly benefit from the proposed rules.

B. What additional costs will be imposed on businesses and other groups as a result of these proposed rules (i.e. new equipment, supplies, labor, accounting, or recordkeeping)? Please identify the types and number of businesses and groups. Be sure to quantify how each entity will be affected.

The department does not expect the proposed rules to result in any additional costs, such as new equipment, supplies, labor, accounting, or recordkeeping on businesses or other groups.

27. Estimate the actual statewide compliance costs of the proposed rules on individuals (regulated individuals or the public). Include the costs of education, training, application fees, examination fees, license fees, new equipment, supplies, labor, accounting, or recordkeeping.

The department does not expect the proposed rules to result in compliance costs such as new educational costs, training, application fees, examination fees, license fees, new equipment, supplies, labor, accounting, or recordkeeping for the public.

A. How many and what category of individuals will be affected by the rules?

All licensed pharmacists and licensed special volunteer pharmacists will be affected by the rules. As of May 19, 2025, there are approximately 18,058 licensed pharmacists and 6 licensed special volunteer pharmacists in the state of Michigan.

B. What qualitative and quantitative impact do the proposed changes in rules have on these individuals?

The department does not expect a quantitative impact from the proposed rule changes. The qualitative impact would be a rule set that is current with drafting standards, provides additional flexibility to licensees who may obtain up to 5 continuing education hours per cycle from programs sponsored by non-pharmacy healthcare boards or accreditation entities, and clearly sets forth the requirements for continuing education, the waiver process, and verifying attendance at board meetings, disciplinary subcommittee meetings, and rules committee meetings for continuing education credit.

28. Quantify any cost reductions to businesses, individuals, groups of individuals, or governmental units as a result of the proposed rules.

There are no expected cost reductions to businesses, individuals, groups of individuals, or governmental units as a result of the proposed rules.

29. Estimate the primary and direct benefits and any secondary or indirect benefits of the proposed rules. Please provide both quantitative and qualitative information, as well as your assumptions.

The proposed rules will directly benefit the licensees and the public by having a rule set that is current with drafting standards, provides additional flexibility to licensees who may obtain up to 5 continuing education hours per cycle from programs sponsored by non-pharmacy healthcare boards or accreditation entities, and clearly sets forth the requirements for continuing education, the waiver process, and verifying attendance at board meetings, disciplinary subcommittee meetings, and rules committee meetings for continuing education credit.

30. Explain how the proposed rules will impact business growth and job creation (or elimination) in Michigan.

The rules are not expected to have an impact on business growth, job creation, or job elimination.

31. Identify any individuals or businesses who will be disproportionately affected by the rules as a result of their industrial sector, segment of the public, business size, or geographic location.

There is not expected to be a disproportionate effect due to industrial sector, segment of the public, business size, or geographic location.

32. Identify the sources the agency relied upon in compiling the regulatory impact statement, including the methodology utilized in determining the existence and extent of the impact of the proposed rules and a cost-benefit analysis of the proposed rules.

Alabama
https://albop.com/pharmacist/

California
https://www.pharmacy.ca.gov/about/earn_ce.shtml

Florida
https://floridaspharmacy.gov/renewals/pharmacist/#tab-ce

Illinois
https://idfpr.illinois.gov/content/dam/soi/en/web/idfpr/renewals/apply/forms/ce-ph.pdf
https://ilga.gov/commission/jcar/admincode/068/06801330sections.html

Indiana
https://www.in.gov/pla/professions/pharmacy-home/pharmacy-licensing-information/#Pharmacist_Continuing_Education
https://iar.iga.in.gov/code/2026/856/1#856-1-26
https://iga.in.gov/laws/2024/ic/titles/25#25-1-4

Minnesota
https://mn.gov/boards/pharmacy/education/pharmacistcontinuingeducation.jsp
https://www.revisor.mn.gov/rules/6800.1500/

New York
https://www.op.nysed.gov/professions/pharmacist/continuing-education
https://www.op.nysed.gov/professions/pharmacist/laws-rules-regulations/article-137?page=1#%C2%A76827-mandatory-continuing-education
https://www.op.nysed.gov/professions/pharmacist/laws-rules-regulations/part-63

Ohio
https://www.pharmacy.ohio.gov/Documents/Licensing/CE/General/Pharmacist CE Reporting Requirements.pdf
https://codes.ohio.gov/ohio-administrative-code/4729
https://codes.ohio.gov/ohio-revised-code/section-4729.12
https://codes.ohio.gov/ohio-revised-code/section-5903.12

Pennsylvania
https://www.pacodeandbulletin.gov/Display/pacode?file=%2Fsecure%2Fpacode%2Fdata%2F049%2Fchapter27%2Fs27.32.html&d=reduce

Wisconsin
https://dsps.wi.gov/Pages/Professions/Pharmacist/CE.aspx
https://docs.legis.wisconsin.gov/code/admin_code/phar/16
https://docs.legis.wisconsin.gov/statutes/statutes/450/085

A. How were estimates made, and what were your assumptions? Include internal and external sources, published reports, information provided by associations or organizations, etc., that demonstrate a need for the proposed rules.

No estimates or assumptions were made.

Alternative to Regulation

33. Identify any reasonable alternatives to the proposed rules that would achieve the same or similar goals.

Since the rules are required by statute, there is no other reasonable alternative to the proposed rules that would achieve the same or similar goals.

A. Please include any statutory amendments that may be necessary to achieve such alternatives.

There is no other reasonable alternative to the proposed rules that would achieve the same or similar goal.

34. Discuss the feasibility of establishing a regulatory program similar to that proposed in the rules that would operate through private market-based mechanisms. Please include a discussion of private market-based systems utilized by other states.

Since the rules are authorized by statute, private market-based systems cannot serve as an alternative. Each state is responsible for implementing its own laws and rules pertaining to continuing education requirements for licensed pharmacists. Private market-based systems are not used for regulating licensees. The licensing and regulation of pharmacists are state functions, so a regulatory program independent of state intervention cannot be established. One could consider pharmacy professional organizations as regulatory mechanisms that are independent of state intervention; however, these professional organizations would provide the public with significantly less protection because membership in these organizations is voluntary. This means an individual who meets the membership requirements, but does not join one of the professional organizations, would be able to practice and there would be no way to ensure that individual's competency or hold them accountable.

No other states in the Great Lakes region use a private, market-based system to regulate continuing education for pharmacist license renewal.

35. Discuss all significant alternatives the agency considered during rule development and why they were not incorporated into the rules. This section should include ideas considered both during internal discussions and discussions with stakeholders, affected parties, or advisory groups.

Since the rules are required by statute, there are no alternatives to the proposed rules that the agency could consider. They are necessary for the administration of and enforcement of the licensing process.

Additional Information

36. As required by MCL 24.245b(1)(c), please describe any instructions regarding the method of complying with the rules, if applicable.

The instructions regarding the method of complying with the rules are found within the rule set.