



ASSISTED LIVING ASSOCIATION  
OF ALABAMA

**URGENT MEMORANDUM TO ALL ASSISTED LIVING FACILITIES**

FROM: Frank Holden, President

DATE: January 6, 2016

Since 2003 LTC and retail pharmacies who service residents in Alabama assisted living facilities have operated under guidance from the Alabama State Board of Pharmacy (ALBOP) for *repackaging prescription medications for veterans and government retirees who get medications in bulk from VA or other pharmacy benefits.*

Recently, ALBOP enforcement officers who inspect pharmacies for compliance have warned this practice may violate ALBOP rules and regulations. Some pharmacies have notified their customers that they will no longer be able to repackaging VA and other referenced bulk medications under any circumstances.

ALAA has been in conversation with ALBOP and as of today we have been assured that ALBOP will continue to allow your pharmacy to repackaging resident medication pending further guidance from the FDA.

Apparently, the US Congress has expanded FDA authority in exerting enforcement control into matters previously controlled by state boards of pharmacy. This interpretation conflicts with prior understanding in Alabama.

**We will await further guidance from ALBOP but in the meantime, pharmacies may continue to repackaging under the 2003 guidance without fear of penalty from ALBOP.**

If your pharmacy has notified you of its decision to cease repackaging please refer them to me or to the ALBOP for an explanation of the current status.