

STATE OF FLORIDA  
DEPARTMENT OF HEALTH  
BOARD OF PHARMACY

FILED  
DEPARTMENT OF HEALTH  
DEPUTY CLERK  
CLERK *Racuer*  
DATE 12-21-07

In Re: PETITION OF **UNIVERSITY OF NEW MEXICO, COLLEGE OF PHARMACY**  
FOR APPROVAL OF CONTINUING EDUCATION COURSE

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**ORDER GRANTING PETITION FOR APPROVAL  
OF CONTINUING EDUCATION COURSE**

THIS MATTER came before the Board of Pharmacy (hereinafter "the Board"), at a duly noticed public meeting held on October 16, 2007, in Tallahassee, Florida, on the petition of University of New Mexico, College of Pharmacy (hereinafter "Petitioner"), for approval of continuing education course. (A copy of the Petition is attached hereto and incorporated as Exhibit A).

The Petitioner was not present or represented. The Board was represented by Reginald D. Dixon, Assistant Attorney General.

After a complete review of the record in this matter, including consideration of the Petitioner's written evidence, the Board makes the following findings and conclusions:

**FINDINGS OF FACT**

1. Petitioner, an ACPE accredited continuing education provider, offers a continuing education program for nuclear pharmacists, via correspondence.
2. The program has been available for, and taken by Florida licensed nuclear pharmacists since March 2007.
3. Although the course was being taken by Florida licensed nuclear pharmacists, the course had not been approved by the Board.
4. This was brought to the Petitioner's attention and the Petitioner immediately sought Board approval. The Board approved the program in August 2007.

5. Those licensed Florida nuclear pharmacists that took the Petitioner's program beginning in March 2007, would be harmed as a result of the lack of Board approval of the program prior to August 2007.

6. Approval of the program effective March 1, 2007, would prevent Florida nuclear pharmacists from suffering harm.

Based on the foregoing, the Board voted to approve the Petitioner's program effective March 1, 2007.

Therefore it is

**ORDERED AND ADJUDGED** that:

The Petition for approval of the continuing education program is **GRANTED**.

This order shall become effective upon filing with the Clerk of the Department of Health.

**DONE AND ORDERED**, this 19 day of December, 2007.

**BOARD OF PHARMACY**

*Rebecca R. Poston*

\_\_\_\_\_  
Rebecca R. Poston, R. Ph.  
Executive Director  
Florida Board of Pharmacy

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by certified mail to: **UNM - College of Pharmacy c/o: Kristina M. Wittstrom, Pharmacy CE Director**, College of Pharmacy, The University of New Mexico, MSC 09 5360, 1 University of New Mexico, Albuquerque, New Mexico 87131-0001; and by interoffice mail to: **Deborah B. Loucks**, Assistant Attorney General, Office of the Attorney General, The Capitol, PL-01, Tallahassee, FL 32399-1050, this 21 day of

December 2007

Reginald Dixon

F:\Users\ADMIN\Reginald Dixon\Pharmacy\Orders\Oct 07\Order.GR.Pet.CE.Approval.Univ.Mexico.rtf

**Deputy Agency Clerk**



Charlie Crist  
Governor

Ana M. Viamonte Ros, M.D., M.P.H.  
State Surgeon General

**MEMORANDUM**

**DATE:** September 19, 2007  
**TO:** Board of Pharmacy  
**FROM:** Rebecca R. Poston, R.Ph., Executive Director *RP*  
**SUBJECT:** Petition for Continuing Education Approval Date Change

**ACTION**

**REQUIRED:** Review Correspondence

**DATE DUE:** October 16-17, 2007

Through correspondence, The University of New Mexico, College of Pharmacy is petitioning the Board to release Florida Nuclear Pharmacists from a requirement to repeat UNM CE monographs completed between March 1, 2006, and the present.

Please review the correspondence provided. Thank you for your consideration of this matter.

RRP/mw

Atch.



September 14, 2007

Board of  
SEP 18 2007  
Pharmacy

Board of Pharmacy  
Florida Department of Health  
Bin # C04  
4052 Bald Cypress Way  
Tallahassee, Florida 32399-3254

Attention: Rebecca Poston, RPh, Executive Director  
Ron Salem, PharmD, Chairman of the Board

Re: Petition for Continuing Education Approval Date Change

Dear Ms. Poston and Dr. Salem;

**Petition:**

We request that the Board grant approval of the University of New Mexico Continuing Education Program for Nuclear Pharmacists effective March 1, 2006 or publication date and release Florida nuclear pharmacists from a requirement to repeat UNM CE monographs completed between March 1, 2006 and the present.

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**Background:** University of New Mexico Continuing Education Program for Radiopharmacists

1. The University of New Mexico is an ACPE accredited continuing education provider.
2. The program has offered correspondence type continuing education courses specific to nuclear pharmacy since 1993.
3. The program was designated by the Board of Pharmaceutical Specialties (BPS) as a professional development program for use as recertification for Board Certified Nuclear Pharmacists as of 1996. This designation was last renewed by BPS in October 2006.
4. BPS requirements for recertification CE require:
  - a. Peer review by two BCNP editors
  - b. Guest editor review for specific topics

- c. Additional review by ten member advisory board of BCNPs for content applicability and contact hour value.
- d. Topics must be applicable and traceable to the knowledge statements contained in the Content Outline for the Nuclear Pharmacy Specialty Certification Examination.
- e. Annual review and annual designation as an approved recertification program.

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The University of New Mexico (UNM) has had continuous Florida Board of Pharmacy program approval from inception in 1993 through 2004. The change which required nuclear pharmacy continuing education programs to register with CE Broker was not effectively processed by UNM. In this case we believe that the lack of compliance was a result of oversight brought about by several circumstances.

Contributors to this oversight include:

1. Program Director located in Australia
2. June 2002: Retirement of the Dean who initiated & held administrative authority for the program.
3. November 2002: Appointment of new Dean (unaware of program oversight)
4. December 2003: Relocation of CE Administrator (and all records) to Australia with no notice
5. June 2005: Termination of Program Director & CE Administrator
6. October 2005: Appointment of new Director and CE Administrator
  - a. Queries about Florida CE requirements resulted in misinformation.
    - i. ACPE accredited programs (no exceptions mentioned) were longer required Florida Board of Pharmacy approval.
    - ii. Pharmacists could self-report earned CE hours for any programs not listed by CE Broker.
7. July 8<sup>th</sup> 2007: Notified by Florida nuclear pharmacist of issues with the UNM CE program.

The July 8<sup>th</sup> phone call prompted an immediate investigation into the situation. Calls were made to CE Broker and to the Board of Pharmacy for directions and clarification. On July 19, 2007, three volumes representing 45 contact hours of CE for nuclear pharmacists were submitted for approval to the Florida Board. These were approved on August 9<sup>th</sup>. Since then, requests have been submitted for approval of 30 contact hours on August 10<sup>th</sup> and 7.5 hours on September 5<sup>th</sup>.

UNM Took prompt corrective action and sought approval from the Board as soon as the miscommunications were clarified. It is our intent to closely monitor compliance with CE provider requirements within the State of Florida from this time forward.

The issue of concern is the requirement for nuclear pharmacists to retake any continuing education lessons completed prior to the Board approval date. For example, if a nuclear pharmacist completed UNM CE lessons, say in March of 2007, for a program Board approved in August, 2007, he/she must retake the assessment for those hours to be credited against the nuclear pharmacist license renewal on February 28, 2008. Back-dating the program approval dates would more strongly support the philosophy of continuous professional development than a requirement to make dates match. Suggested back-dates are listed in the table in Appendix A.

We ask that the Board consider back dating the listed nuclear pharmacy continuing education approval dates to not penalize those pharmacists who choose to complete their CE over the renewal period. We are prepared to make a personal appearance before the Board at the October meeting to formally present this petition if necessary.

Thank you for your consideration of this request as it is uniquely important to nuclear pharmacists licensed in Florida. If there should be any questions, please feel free to contact me.

Sincerely,



Kristina M. Wittstrom, MEd, RPh, BCNP, FAPhA  
Pharmacy CE Director, Radioarmacy  
College of Pharmacy  
The University of New Mexico  
MSC 09 5360  
1 University of New Mexico  
Albuquerque, New Mexico 87131-0001  
505-272-3661  
[kwittstrom@salud.unm.edu](mailto:kwittstrom@salud.unm.edu)

CC: John Pieper, Dean, College of Pharmacy, University of New Mexico  
Wayne Bourdreaux, Cardinal Health Nuclear Pharmacy Services  
Brigette Nelson, Triad Isotopes  
Fred Gattas, Covidien  
Michael Mosley, PetNet Solutions  
David Barnes, GE Health Systems  
Rich Nickels, Chair, Nuclear Pharmacy Section, APPM, APhA

Appendix A:

**The UNM Correspondence Continuing Education Courses for Nuclear Pharmacists**

The University of New Mexico has offered correspondence type continuing education courses specific to nuclear pharmacy since 1993. In 1996, the program was designated by the Board of Pharmaceutical Specialties (BPS) as a professional development program for use as recertification for Board Certified Nuclear Pharmacists. This designation was last renewed by BPS in October 2006.

The current program consists of electronic subscription volumes, each representing fifteen contact hours of continuing education. The lesson materials are available online for subscribers. Upon completing a lesson, the subscriber completes an electronic quiz which, if successful, auto-generates a certificate of completion. Volumes currently available for subscription are summarized below.

UNM ID	ACPE Accreditation Information			Florida BOP Information			
	Contact Hrs	ACPE PIN	Exp Date	CE Tracking No	Submitted	Approval	Back Date Requested
13-6	2.5	039-000-07-006-H04-P	8/30/2010	pending	9/5/2007		8/30/2007
13-5	1.0	039-000-07-005-H04	3/17/2010	pending	9/5/2007		3/17/2007
13-4	1.0	039-000-07-004-H04	3/17/2010	pending	9/5/2007		3/17/2007
13-3	1.0	039-000-07-003-H04	3/17/2010	pending	9/5/2007		3/17/2007
13-2	1.0	039-000-07-002-H04	3/17/2010	pending	9/5/2007		3/17/2007
13-1	1.0	039-000-07-001-H04	3/17/2010	pending	9/5/2007		3/17/2007
12-all	15	039-000-06-121-H04	5/24/2009	20-156187	7/19/2007	8/9/2007	3/1/2006
11-all	15	039-000-07-202-H04	5/25/2010	20-156185	7/19/2007	8/9/2007	3/1/2006
10-all	15	039-000-07-010-H04	7/20/2010	20-156184	7/19/2007	8/9/2007	3/1/2006
9-all	15	039-000-07-009-H04	7/20/2010	pending	8/10/2007		3/1/2006
8-all	15	039-000-07-008-H04	7/20/2010	pending	8/10/2007		3/1/2006