



**State of Vermont**  
**Office of the Secretary of State**  
**Office of Professional Regulation**  
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**Sarah Copeland Hanzas, Secretary of State**  
**S. Lauren Hibbert, Deputy Secretary**  
**Jennifer B. Colin, Director**

Rep. Trevor Squirrel, Chair  
Legislative Committee on Administrative Rules  
c/o Emery Mattheis, Committee Assistant  
Vermont State House  
Montpelier, VT 05602  
By email to [emattheis@leg.state.vt.us](mailto:emattheis@leg.state.vt.us)

July 30, 2025

Re: Request to Extend Date for Adoption of the Administrative Rules for the Board of Pharmacy (25P001)

Dear Chair Squirrel and Members:

I am writing to ask the Legislative Committee on Administrative Rules to allow the Office of Professional Regulation until November 15, 2025, to adopt the amended Administrative Rules for the Board of Pharmacy (Pharmacy Rules).

The Vermont Administrative Procedures Act requires that an agency adopt a rule within eight months of initially filing the rule, unless the eight-month timeline is extended by LCAR's "action or request." 3 V.S.A. § 843(c). OPR initially filed the Pharmacy Rules on January 15, 2025, with the deadline for public comment on March 31, 2025. OPR held three public hearings and received voluminous written comment.

Since these rules were first filed, undersigned counsel led the adoption of rules for three other professions. Meanwhile, OPR has undergone significant transition: effective July 1, OPR's General Counsel Jennifer Colin became OPR's Director, and a brand-new General Counsel started on July 14. This past month, as we approach the adoption deadline, OPR's pharmacy executive has also been especially busy with pharmacy license renewals, an event that takes up her full-time energy every other July.

The public comment, as one might imagine in a highly regulated area with thousands of licensees, was substantial. Commenters pointed out important ways to improve the rules' usability for licensees, and we have since heavily revised the rules in collaboration with the Board of Pharmacy.

Some of the most important changes will affect the licensing requirements and scope of practice for pharmacy technicians. Rulemaking is a delicate balancing act between public safety and the livelihoods of the over 2,000 Vermonters who hold pharmacy technician registrations. We received robust comment about these changes and are revising accordingly. Changes in federal immunization policy have also complicated rule revision.



We request until November 15, 2025, to adopt these administrative rules. OPR will file final proposed rules and cover sheets by October 30, for LCAR's consideration at its November 13 meeting or earlier.

Thank you for taking the time to consider this matter

Sincerely,

/s/ Emily Tredeau

Emily Tredeau  
Staff Attorney  
Office of Professional Regulation