

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