

Board Response to Economic Impact Analysis

Board of Pharmacy

The Board of Pharmacy concurs with the Economic Impact Analysis (EIA) of the Department of Planning and Budget on proposed regulations resulting from a periodic review with one exception. On pages 10 and 11, the EIA questions whether benefits outweigh costs for persons who will not be allowed to open a pharmacy in a private residence. The primary concern of the Board in restricting licensure of a pharmacy in a private residence is security of such a pharmacy and the inherent risk to the residents and neighbors. The availability of quantities of drugs in a private residence makes that location vulnerable to criminal activity. In 2005, there were 13 armed robberies of pharmacies and 17 night break-ins; in 2006, there were 11 armed robberies and 18 night break-ins in Virginia. In addition, there are numerous attempted robberies that are foiled or aborted. It appears to the Board that there are significant costs in terms of public safety and loss of property, so the benefit of avoiding those costs would outweigh any lost entrepreneurial opportunity.