

**Agency Response to Economic Impact Analysis  
of the Department of Planning and Budget**

The Board does not agree with the estimated economic impact of the Department in which it is stated that “the proposed regulation also requires pharmacies to provide 14-day advance notification to the Board and the public, of any change in operating hours lasting more than one week.” **The notification requirement is clearly and specifically statutory (§ 54.1-3434),** not a requirement initiated by the proposed regulation.

The proposed regulation provides that notice shall be given to the public and to the Board **in accordance with § 54.1-3434**. The purpose of the regulation is to provide for exceptions to the requirement, if the change is necessitated by emergency circumstances or the change will result in an expansion of pharmacy hours.

The Board would agree that “the requirement is intended to protect consumers from an abrupt reduction in pharmacy hours which could interrupt patients’ ability to get vital prescriptions filled in a timely manner or deny them access to their prescription records.” (DHP analysis)  
However, it is a requirement imposed by the Code of Virginia as amended by Chapter 490 of the 1998 Acts of the Assembly, not a requirement imposed by the Board as a result of the proposed regulation.