

May 22, 2017

Subject: PharmacyChecker Update and Request for Input

Dear Healthcare and Public Health Advocate:

As someone who has practiced pharmacy, including over 20 years in a hospital setting and two years with the Massachusetts Board of Registration in Pharmacy as Director of Pharmacy Quality Assurance, I'm as concerned about patient safety, and the quality assurance of pharmacy practices as anyone. At PharmacyChecker, my concern is patients buying medication online because drug prices are often too high locally in our country.

You are probably aware that, despite federal restrictions, millions of Americans buy medication from other countries each year; ordering it online and importing it for personal use. For many it's their only affordable option. Through the PharmacyChecker Verification Program, we verify and monitor pharmacy practice standards of international online pharmacies to better inform patients attempting to affordably purchase medications online and steer clear of rogue pharmacies.

Since 2002, PharmacyChecker has been researching, verifying and monitoring international online pharmacies; comparing their drug prices; and publishing this information at www.pharmacychecker.com, which is freely accessible. Independent, peer-reviewed research demonstrates the safety of online pharmacies verified in our program.

Over the past year, I have been working to further develop, revise and strengthen the requirements for meeting the Verification Program standards as well as improve transparency of those requirements for online pharmacy members, healthcare providers and advocates, and patients.

I am writing to you today to invite you to review our program's standards and policies. I would welcome any comments, questions or recommendations you have for improvement. Our standards and policies can be found on our [PharmacyChecker Verification Program application page](#).

PharmacyChecker recognizes the importance of continuous quality improvement of our Program. By continually evaluating our processes and benchmarking our program requirements against best practices and changes in the marketplace, PharmacyChecker works to ensure its verification program requirements continue to meet industry best practices for validating high standards of online pharmacy practice. In so doing, we protect the health of consumers who use our verification and pricing information to buy affordable medication.

Some recent highlights of our work include:

I. Policy Revisions / Development

Policy Guidance was revised and/or developed to provide clear guidance regarding compliance with the Verification Program standards.

II. Revising and Reformatting the Verification Program Standards and Membership Guide

Revising and reformatting the Verification Program Standards and Guide, including numbering and organizing the standards by category:

- Incorporates all the program requirements into the Verification Program Standards and Guide, which includes references and links to policies and required forms, provides clear guidance and greater transparency regarding program requirements; and
- Allows the Verification Program requirements-standards, policies, required forms, as well as the inspection program (where applicable) to be clearly referenced in one document.

III. Revising and Consolidating Membership Agreements

Revising and consolidating the online pharmacy agreement and pharmacy standards agreement into one membership agreement, including numbering and organizing the agreement to correspond to the Verification Program standards:

- Incorporates all the program requirements into the Verification Program Membership Agreement that aligns with the Verification Program standards and provides clear guidance and greater transparency regarding program requirements; and
- Allows the Verification Program requirements-standards, policies, required forms, as well as the inspection program (where applicable) to be clearly referenced in one agreement.

I would be happy to answer any questions you have about our Verification Program and very much seek your input on how we could do even better.

Sincerely,



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