

## Wholesale Distributor, 3PLs and Limited Distributors FAQ

### **1. Why is the Board extending the expiration date of my 2018 wholesale distributor license?**

a. Legislation was passed in the 2018 legislative session that reorganized the licensing of wholesale distributors to better align with Title II of the Drug Supply Chain Security Act (DSCSA). Rule promulgation is currently underway, but will not be effective until after January 1, 2019. Therefore, the Board will be automatically extending the expiration date of wholesale distributor licenses from 12/31/18 to 3/31/19 for renewal to make this transition easier. This extension is only occurring for the 2019 renewal.

### **2. When will I be able to renew my wholesale distributor license?**

a. That depends. If you are a wholesaler of human prescription drugs as defined by the DSCSA, you may renew your license online beginning December 1, 2018. If you are a limited distributor or a 3PL, you will need to wait to fill out a new license application for the appropriate license category. The Board anticipates having these applications available January 1, 2019.

### **3. How do I know which license type I need?**

a. No one knows your business better than you do. You may review Iowa Code 155A, Iowa Administrative Code 657-17, 657-42, 657-43 and Title II of the Drug Security Chain Supply Act (DSCSA). If, after reviewing the applicable laws and rules you're still unsure which license is most appropriate, please consult your attorney.

### **4. Are the license periods changing?**

a. Yes and no. Wholesale distributor and limited distributor licenses will run from January 1-December 31, annually (current licensing period for wholesale distributors). 3PL license period will run from April 1-March 31, annually.

### **5. Where can I find the Iowa Code that grants the Board the authority to license wholesale distributors, 3PLs and Limited Distributors?**

a. <https://www.legis.iowa.gov/docs/code/155a.pdf>

### **6. Where can I find the rules that govern the licensing requirements for wholesale distributors of human prescription drugs?**

a. <https://rules.iowa.gov/Notice/Details/3974C>

### **7. Where can I find the rules that govern the licensing requirements for limited distributors?**

a. <https://rules.iowa.gov/Notice/Details/3975C>

### **8. Where can I find the rules that govern the licensing requirements for third-party logistics providers (3PLs)?**

a. <https://rules.iowa.gov/Notice/Details/3976C>

**9. What are the licensing fees for licensure as a wholesale distributor or a 3PL?**

a. \$750 per year.

**10. What are the licensing fees for licensure as a limited distributor?**

a. \$175 per year.

**11. Are background checks required for licensure?**

a. An FBI background check is required to be performed on the facility manager of a wholesale distributor or a 3PL. Background checks for facility managers of limited distributors are not required.

**12. How much are background checks?**

a. Background checks are \$45. This is in addition to all other licensing fees.

**13. Does Iowa require accreditation with the National Association of Boards of Pharmacy (NABP) as a Verified Accredited Wholesale Distributor (VAWD)?**

a. Yes. All new wholesale distributors and 3PLs seeking initial licensure in Iowa must provide proof of VAWD accreditation prior to a license being issued by the Board. Currently licensed wholesale distributors and 3PLs must provide proof of VAWD accreditation with the 2020 renewal.

**14. The Iowa Board of Pharmacy is requiring VAWD accreditation for currently licensed wholesale distributors and 3PLs starting with the 2020 renewal. What happens if I don't obtain accreditation by that date?**

a. VAWD accreditation is a minimum licensing requirement for wholesale distributors and 3PLs. The Board will begin enforcing this requirement for currently licensed wholesale distributors and 3PLs with the 2020 license renewal. Persons or entities that fail to meet minimum licensing requirements will no longer qualify for the license.

**15. I'm a third-party logistics provider that warehouses and orchestrates the sales of non-DSCSA-covered prescription drugs and devices. Do I need a license to ship product into Iowa?**

a. Most likely, but not a 3PL license. A 3PL license is required for persons or entities providing logistical services relating to human prescription drugs. For the type of activity described here, you most likely will need a Limited Distributor license. However, if you're unsure, you should consult your attorney for an opinion.