

**From:** LPOE@utah.gov  
**Sent:** Thursday, August 25, 2011 2:59 PM  
**To:** mdiorio@rxrd.com  
**Cc:** Kimball, Shirlene; Taylor, David  
**Subject:** Re: Question

Note: This response is from W. Ray Walker, Regulatory and Compliance Officer. I am responding to Laura Poe's e-mail during her extended absence.

The answer is no, out-of-state reverse distributors are not required to be licensed with the State of Utah. Subsection R156-17b-301 of the Utah Administrative Code provides as follows (emphasis added):

**R156-17b-301. Pharmacy Licensure Classifications - Pharmacist-in-Charge Requirements.**

In accordance with Subsection 58-17b-302(4), the classification of pharmacies holding licenses are clarified as:

- (3) Class C pharmacy includes pharmacies located in Utah that are involved in:
- (a) manufacturing;
  - (b) producing;
  - (c) wholesaling;
  - (d) distributing; and
  - (e) reverse distributing.