

Publications

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NYBOP May 2026 Deadline Is Fast Approaching: Do Your Pharmacy and Pharmacists Have the Right Licenses?

Key Takeaways:

- The New York State Board of Pharmacy (NYBOP) issued guidance in December 2025 requiring licensure both for pharmacies and for each individual pharmacist participating in shared pharmacy services arrangements when servicing New York patients.
- Nonresident pharmacy registration alone is no longer sufficient to satisfy shared services compliance.
- While this requirement becomes effective May 22, 2026, organizations should not delay taking action now. A proactive assessment and timely remediation of any licensure gaps will be critical to ensuring compliance moving forward.

What Organizations Should Be Doing Now

- Evaluate your shared services model to identify where operations may be impacted;
- Confirm that all pharmacists supporting or involved in New York operations, including remote personnel, hold appropriate licensure and identify any gaps;
- Implement proactive compliance measures for any functions where required licensure cannot be obtained prior to or at the May 22, 2026 deadline.

What Pharmacists Should Be Doing Now

Pharmacists already licensed in another state (who have never been licensed in New York State) are encouraged to consult the Board's Licensure Requirements page, which outlines the process for submitting an application and transferring a license through the NABP's Electronic Licensure Transfer Program (e-LTP). Upon approval of the above, applicants will be eligible to apply to take the New York State MPJE examination. Pharmacists should take action now to avoid potential delays in licensure which may occur as a result of the large influx of new applicants.

Regulatory Framework and Board Interpretation

NYBOP's position is grounded in Education Law §§ 6802(30) and 6809, which the Board

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interprets to require that shared pharmacy services be performed only by registered pharmacists or registered pharmacies. Shared pharmacy services enable pharmacies to collaborate by delegating certain tasks such as prescription processing and fulfillment, often across state lines, to improve operational efficiency and expand patient access to medications. Under the prior framework, a pharmacy properly registered with New York could utilize pharmacists who were not individually licensed in the state, including those located outside of New York. The Board does not view the new framework as conflicting with New York's nonresident pharmacy regime, which regulates at the entity level, because shared pharmacy services impose distinct and additional registration obligations at the individual level. Notably, the requirement extends to remote and decentralized pharmacist activities, even where such services are performed outside of a licensed pharmacy setting.

Looking Ahead

For additional guidance related to these requirements, including evaluating the impact on your organization's licensure obligations or assistance in obtaining any necessary licenses, please reach out to Laura Pone, Mary Canavan, Josh McCann, Natalie Bartolovic, David Bird, Odera Ikenna-Obioha, a member of the Polsinelli Licensure, Enrollment & Certification team, or your preferred Polsinelli attorney.