

# Partnership for DSCSA Governance (PDG) Foundational Blueprint for 2023 Interoperability

## DSCSA State License Status Analysis

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## State Licensing Status and ATP Credential Issuance

The DSCSA requires that trading partners only transact with other trading partners that are “Authorized.” In the case of Wholesalers and Dispensers, “Authorized” is defined as having a valid license under State law. There are several issues with licensing data across the various Boards of Pharmacy and other State regulatory agencies that will affect normalizing the issuance and maintenance rules for credentialing based on State license data.

*Table 1* lists the current license statuses by State and the decision as to whether to issue an ATP credential based on that status. An interpreted Status of “Active” infers the trading partner is “Authorized.” An Interpreted Status of “Non-Active” does not infer that the company is not an “Authorized” trading partner, rather, it depicts whether an ATP Credential Issuer would issue an ATP credential or revoke a current credential. An Issuer will issue an ATP credential if the Interpreted Status is “Active.” An Issuer will revoke an ATP Credential when the Interpreted Status becomes “Non-Active.”

Credentialing requirements documented in Chapter 1 require an ATP Credential Issuer to ensure certain trading partner types hold a valid State license. All ATP Credential Issuers SHALL only consider a trading partner an “ATP” if their State license status has a corresponding “Interpreted Status” of “Active” in *Table 1*.<sup>1</sup>

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<sup>1</sup> This information has been approved by PDG membership and shared with FDA and State Boards of Pharmacy (through their association, NABP).

## State License Analysis

Table 1 - State License status and Credential Issuance Requirements

State	Status From State Source	Interpreted Status (Active/Non-Active)
Alabama	Active	Active
	Closed	Non-Active
	Inactive	Non-Active
	Revoked	Non-Active
	Surrendered	Non-Active
Alaska	Active	Active
	Conditioned	Active
	Inactive	Non-Active
	Limited	Active
	Probation	Active
	Suspended	Non-Active
Arizona	Open	Active
	Open - Previous Discipline	Active
	Administrative Hold	Non-Active
	Applied - Awaiting Board Approval	Non-Active
	Approved - Awaiting Inspection	Non-Active
	Archive	Non-Active
	Closed	Non-Active
	Closed - Did Not Renew	Non-Active
	Closed - Did Not Renew + Prev. Discipline	Non-Active
	Closed - Discipline Action Taken	Non-Active
	Closed - Never Opened	Non-Active
	Closed - Never Opened - Previous Discipline	Non-Active
	Closed - Ownership Change	Non-Active
	Closed - Ownership Change - Previous Discipline	Non-Active
	Closed - Previous Discipline	Non-Active
Closed - Provisional	Non-Active	

State	Status From State Source	Interpreted Status (Active/Non-Active)
	Closed - Revoked	Non-Active
	Denied	Non-Active
	Open - Probation	Active
	Renewal Denied	Non-Active
	Suspended	Non-Active
	Void	Non-Active
	Voluntarily Surrendered	Non-Active
	Withdrawn	Non-Active
Arkansas	Active	Active
	Inactive	Non-Active
California	Active	Active
	Delinquent	Non-Active
	Inactive	Non-Active
Colorado	Active	Active
	Active - With Conditions	Active
	Cancelled	Non-Active
	Expired	Non-Active
	Revoked	Non-Active
	Surrendered	Non-Active
	Voluntary Surrender	Non-Active
Connecticut	Active	Active
	Inactive	Non-Active
Delaware	Active	Active
	Inactive	Non-Active
	Probation	Active
District of Columbia	Active	Active
	Closed	Non-Active
	Expired	Non-Active
Florida	Clear	Active
	Closed	Non-Active
	Conditional	Active

State	Status From State Source	Interpreted Status (Active/Non-Active)
	Discp-Relinq	Non-Active
	Null And Void	Non-Active
	Obligations	Non-Active
	Probation	Active
	Revoked	Non-Active
	Vol-Relinq	Non-Active
	Volun. Withdraw	Non-Active
	Vr Pend Bd Act	Non-Active
Georgia	Active	Active
	Active - Renewal Pending	Active
	Facility Closed	Non-Active
	Lapsed	Non-Active
	Probation	Active
	Revoked	Non-Active
	Superseded	Non-Active
Hawaii	Active	Active
	C - Current, Valid & In Good Standing	Active
	Z - Current & Valid, But Subject to Disciplinary Requirement	Active
	Cm - Current, Valid & In Good Standing/Maint. Requirement Due	Active
	Inactive	Non-Active
Idaho	Active	Active
	Cancelled	Non-Active
	Cancelled By Entity	Non-Active
	Expired	Non-Active
	Inactive	Non-Active
	Revoked	Non-Active
	Superseded	Non-Active
	Surrendered	Non-Active
Illinois	Active	Active
	Cancelled	Non-Active

State	Status From State Source	Interpreted Status (Active/Non-Active)
	Change Of Ownership	Non-Active
	Closed	Non-Active
	Expired	Non-Active
	Inactive	Non-Active
	Non Sufficient Fund Check	Non-Active
	Non Sufficient Fund Check Terminated	Non-Active
	Not Renewed	Non-Active
	Probation	Active
	Refuse To Renew	Non-Active
	Relinquish	Non-Active
	Revoked	Non-Active
	Suspended	Non-Active
	Terminated	Non-Active
	Voluntary Surrender	Non-Active
Indiana	Active	Active
	Closed Facility	Non-Active
	Probation	Active
	Valid To Practice While Reviewed	Active
	Voluntary Surrender	Non-Active
Iowa	Active	Active
	Current/Active	Active
	Cancelled	Non-Active
	Delinquent	Non-Active
	Denied	Non-Active
	Expired	Non-Active
	Pending	Non-Active
	Pending - Opening Inspection	Non-Active
	Probation	Active
	Restricted	Active
	Revoked	Non-Active
	Suspended	Non-Active

State	Status From State Source	Interpreted Status (Active/Non-Active)
	Voluntary Surrender - Discipline	Non-Active
Kansas	Active	Active
	Active - Pending Renewal	Active
	Active - Renewal Under Review	Active
	Cancelled	Non-Active
	Expired	Non-Active
	Revoked	Non-Active
Kentucky	Active	Active
	Closed	Non-Active
Louisiana	Active	Active
	ACTIVE - IN RENEWAL-Active; Within Renewal Cycle	Active
	ACTIVE-Current, Without Restriction or Limitation	Active
	READY FOR PRINTING-Current, Without Restriction or Limitation	Active
	CLOSED-Pharmacy Closed Permanently	Non-Active
	EXPIRED - RESTRICTED-Lapsed; Not Valid for Practice	Non-Active
	EXPIRED-Lapsed; Not Valid for Practice	Non-Active
	INACTIVATED-Credential Inactivated	Non-Active
	Inactive	Non-Active
	RELINQUISHED-Returned for Non-Disciplinary Reasons	Non-Active
	RESTRICTED-Active; Restricted by Board Decision	Active
	REVOKED-Revoked Via Board Decision; Not Valid for Practice	Non-Active
SUSPENDED-Suspended Via Board Decision; Not Valid for Practice	Non-Active	
Maine	Active	Active
	Canceled	Non-Active
	Denied	Non-Active
	Expired	Non-Active
	Failed To Renew	Non-Active

State	Status From State Source	Interpreted Status (Active/Non-Active)
	Not Licensed	Non-Active
	Pending	Non-Active
	Revoked	Non-Active
	Suspended	Non-Active
	Withdrawn/Terminated by Licensee	Non-Active
Maryland	Active	Active
	Licensed	Active
	Cancelled	Non-Active
	Closed	Non-Active
	Inactive	Non-Active
	Revoked	Non-Active
Massachusetts	Current	Active
	Business Closed	Non-Active
	Business Relocation	Non-Active
	Business Transfer of Ownership	Non-Active
	Expired	Non-Active
	Non-Disciplinary Conditions	Active
	Non-Disciplinary Restriction; Expired	Non-Active
	Null And Void	Non-Active
	Probation	Active
	Revoked; Expired	Non-Active
	Suspension: Expired	Non-Active
	Voluntary Surrender; Expired	Non-Active
Michigan	Active	Active
	Active - In Late Renewal	Active
	Active - Renewal Exempt	Active
	Disciplinary Limited	Active
	Inactive	Non-Active
	Suspended	Non-Active
Minnesota	Active	Active
	Closed	Non-Active



State	Status From State Source	Interpreted Status (Active/Non-Active)
	Owes	Non-Active
Mississippi	Active	Active
	Closed	Non-Active
	Expired	Non-Active
Missouri	Active	Active
	Inactive	Non-Active
Montana	Active	Active
	Approved	Active
	Active Probation	Active
	Admin Suspension Expired	Non-Active
	Administrative Suspension	Non-Active
	Closed	Non-Active
	Expired	Non-Active
	Inactive	Non-Active
	Inactive Expired	Non-Active
	Record Closed	Non-Active
	Revoked	Non-Active
	Suspended	Non-Active
	Suspended Expired	Non-Active
	Terminated	Non-Active
Voluntarily Surrendered	Non-Active	
Nebraska	Active	Active
	Inactive	Non-Active
Nevada	Active	Active
	Closed	Non-Active
	Inactive	Non-Active
	Non-Renewed	Non-Active
	Pending Renewal	Active
	Revoked	Non-Active
	Suspended	Non-Active
	Temporary	Active

State	Status From State Source	Interpreted Status (Active/Non-Active)
	Voluntary Surrender	Non-Active
	Voluntary Surrender Resulting in Discipline	Non-Active
New Hampshire	Active	Active
	Inactive	Non-Active
New Jersey	Active	Active
	Closed	Non-Active
	Expired	Non-Active
	Inactive	Non-Active
	Out Of Business	Non-Active
	Reinstatement Pending	Non-Active
	Revoked	Non-Active
	Suspended	Non-Active
	Voluntary Surrender	Non-Active
New Mexico	Active	Active
	Inactive	Non-Active
New York	Active	Active
	Active With Partial Suspension - Pharmacy May Not Engage in Sterile Compounding Activities	Active
	Discontinued	Non-Active
	Not Registered	Non-Active
	Transfer	Non-Active
North Carolina	Active	Active
	Inactive	Non-Active
	Pending	Non-Active
North Dakota	Active	Active
	Inactive	Non-Active
Ohio	Active	Active
	Active	Active
	Active Probation	Active
	Closed	Non-Active
	Inactive	Non-Active

State	Status From State Source	Interpreted Status (Active/Non-Active)
	Inactive	Non-Active
	Inactive Abandoned	Non-Active
	Inactive Closed	Non-Active
	Inactive Expired	Non-Active
	Inactive Lapsed	Non-Active
	Inactive Revocation	Non-Active
	Inactive Surrendered	Non-Active
	Inactive Suspended	Non-Active
	Inactive Withdrawn	Non-Active
	Inactive Abandoned	Non-Active
	Inactive Closed	Non-Active
	Inactive-Expired	Non-Active
	Inactive Lapsed	Non-Active
	Inactive-Not Renewing	Non-Active
	Inactive-Revocation	Non-Active
	Inactive Surrendered	Non-Active
	Inactive Suspended	Non-Active
	Inactive Withdrawn	Non-Active
	Withdrawn	Non-Active
	Oklahoma	Active
License In Good Standing		Active
Closed		Non-Active
Inactive		Non-Active
Probation		Active
Oregon	Active	Active
	Inactive	Non-Active
Pennsylvania	Active	Active
	Inactive	Non-Active
Rhode Island	Active	Active
	Active Probation	Active
	Inactive	Non-Active

State	Status From State Source	Interpreted Status (Active/Non-Active)
South Carolina	Active	Active
	Active In Renewal	Active
	Approved	Active
	Canceled	Non-Active
	Cease and Desist	Non-Active
	Closed	Non-Active
	Denied	Non-Active
	Inactive	Non-Active
	Lapsed	Non-Active
	Pending	Non-Active
	Pending – Letter or Email Sent	Non-Active
	Pending – Review	Non-Active
	Permanently Revoked	Non-Active
	Relinquished	Non-Active
	Revoked	Non-Active
	Suspended	Non-Active
Voluntary Surrendered	Non-Active	
Withdrawn	Non-Active	
South Dakota	Current/Active	Active
Tennessee	Licensed	Active
	Facility Closed	Non-Active
Texas	Active	Active
	Current	Active
	Delinquent	Non-Active
	Expired Pharm	Non-Active
	Inactive	Non-Active
	Probation	Active
	Revocation	Non-Active
	Suspension	Non-Active
Utah	Active	Active
	Active On Probation	Active

State	Status From State Source	Interpreted Status (Active/Non-Active)
	Administrative Hold	Non-Active
	Application Cancelled	Non-Active
	Expired	Non-Active
	Expired Limited	Non-Active
	Expired On Probation	Non-Active
	Expired On Suspension	Non-Active
	Null And Void	Non-Active
	Renewal Denied	Non-Active
	Revoked	Non-Active
	Superseded	Non-Active
	Surrendered	Non-Active
	Suspension	Non-Active
	Transferred	Non-Active
	Unknown At Conversion	Non-Active
Vermont	Active	Active
	Active-In Renewal	Active
	Active - Conditioned	Active
	Application Denied (Conduct)	Non-Active
	Expired	Non-Active
	Expired - Conditioned	Non-Active
	Revoked	Non-Active
	Surrendered	Non-Active
	Suspended	Non-Active
Virginia	Active	Active
	Inactive	Non-Active
Washington	Active	Active
	Active Not Renewable	Active
	Active On Probation	Active
	Closed	Non-Active
	Expired	Non-Active
	Inactive	Non-Active

State	Status From State Source	Interpreted Status (Active/Non-Active)
	Inoperable	Non-Active
	Pending	Non-Active
	Revoked	Non-Active
	Superseded	Non-Active
	Suspended	Non-Active
	Terminated	Non-Active
West Virginia	Active	Active
	Closed	Non-Active
	Inactive	Non-Active
Wisconsin	Active	Active
	License Is Current (Active)	Active
	Denied	Non-Active
	Expired	Non-Active
	Inactive	Non-Active
	Issued In Error	Non-Active
	License Is Not Current (Expired)	Non-Active
	License Is Not Current (Inactive)	Non-Active
	Revoked	Non-Active
	Suspended	Non-Active
	Voluntary Surrender	Non-Active
Wyoming	Active	Active
	Inactive	Non-Active
	Pending Inspection	Non-Active
	Pending Renewal	Active