

#2625

prevention | point | pittsburgh

907 WEST STREET, 5TH FLOOR • PITTSBURGH, PA 15221
PHONE: 412.247.3404 • FAX: 412.247.1640 • www.pppgh.org

RECEIVED

2009 JUL 21 AM 7:07

July 17, 2009

Arthur Coccodrilli, Chairman of the Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Re: Final regulation #16a-5418 from the PA State Board of Pharmacy "Sales of hypodermic syringes and needles" (IRRC #2625), 49 Pa. Code Ch. 27.18

Dear Chairman Coccodrilli,

On behalf of Prevention Point Pittsburgh, Western Pennsylvania's only needle exchange program, I write to express our strong support of final regulation #16a-5418, which will allow pharmacy sales of syringes without a prescription.

Contaminated needle sharing is a major risk factor for HIV and Hepatitis in the state of Pennsylvania, yet the only locations to legally obtain a sterile syringe without a prescription are the needle exchange programs in Pittsburgh and Philadelphia, leaving the rest of the state completely dry in terms of sterile syringe access, an alarming public health threat to the citizens of Pennsylvania.

It is critical that Pennsylvania join the vast majority of states in the country that have already removed legal barriers concerning pharmacy sales of sterile syringes for the purpose of reduction of the spread of blood borne disease. Science has overwhelmingly confirmed that increasing access to sterile syringes can drastically reduce the spread of HIV and Hepatitis, without increasing rates of drug use.

Individuals struggling with addiction travel from all over Western Pennsylvania to Prevention Point Pittsburgh to obtain sterile syringes in order to protect themselves and their families from life-threatening blood borne disease. Program participants from surrounding counties relate to us the dangerous public health conditions with regard to syringe sharing in their communities, a situation directly resulting from the scarcity of sterile syringes. The current restrictions on sterile syringe access in pharmacies largely contribute to the spread of HIV and Hepatitis, not only injectors themselves, but their sexual partners, their children, and the wider community.

We applaud The Pennsylvania Pharmacy Board's and The Independent Regulatory Review Commission's careful consideration of this important regulatory change, and urge the approval of the final regulation 16a-5418. The approval of this regulatory change will save lives.

Sincerely,

Renee Cox
Executive Director
Prevention Point Pittsburgh
907 West St. 5th Floor
Pittsburgh, PA 15221

Advisory Board

Sylvia Barksdale, MSW
Thuy Bui, MD
Scott Burris, JD
Robyn Dawes, PhD

Barbara Feige
Linda Frank, PhD, MSN, ACRN
Phillip Hallen
LeRoyal Hammond

Sandra Quinn, PhD
Anthony Silvestre, PhD
Wesley Sowers, MD

2625

From: Renee Cox [renee@pppgh.org]
Sent: Monday, July 20, 2009 4:06 PM
To: IRRC
Subject: Final regulation #16a-5418 Comment from Prevention Point Pittsburgh
Attachments: 16A 5418_pppgh_7_09.doc

Hello,

Attached are comments on the Final Regulation #16a-5418 (Sales of hypodermic syringes and needles) to be considered for IRRC's July 23 meeting. The letter will also be faxed. Thank you!

Renee Cox
Executive Director
Prevention Point Pittsburgh
907 West St. 5th Floor
Pittsburgh, PA 15221
412-247-3404
FAX 412-247-1640
renee@pppgh.org

RECEIVED
2009 JUL 21 AM 7:07
INDEPENDENT REGULATORY
COMMISSION