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INDEPENDENT REGULATORY
REVIEW COMMISSION

James H. Andrews, LCSW, BCD
President

Jenna Mehnert, MSW
Executive Director

September 5, 2007

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

Dear Chairman Coccodrilli,

The National Association of Social Workers, Pennsylvania Chapter (NASW-PA) is commenting on the proposed amendment to the State Board of Pharmacy regulations in § 27.18, which would alter the current requirements regarding the sale of hypodermic needles and syringes in pharmacies.

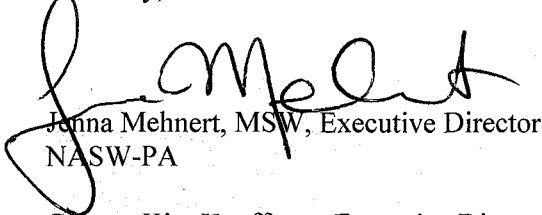
Current drug policies primarily focus on interdiction and law enforcement. NASW-PA seeks the adoption of a comprehensive public health approach that enables social workers to focus on prevention and treatment. A public health approach to intravenous drug use would permit the development of more sensible policies with respect to diseases such as HIV/AIDS. This calls for the use of harm reduction strategies aimed at those already afflicted by drug use and those who have HIV/AIDS.

Approximately 30% of those infected with HIV/AIDS are intravenous drug users. Furthermore, given testimony states that there are over 30,000 cases of AIDS in Pennsylvania alone. There is an obvious need for prevention efforts. Research shows that prevention efforts made through increased availability to clean needles/syringes can reduce transmission not only for HIV/AIDS, but also many other systemic diseases.

NASW-PA, a membership organization representing 6,100 social workers, supports this public health approach in the proposed regulation of permitting the sale of needles/ syringes without a required prescription.

Thank you for your time and attention to this request.

Sincerely,


Jenna Mehnert, MSW, Executive Director
NASW-PA

Cc: Kim Kauffman, Executive Director, IRRC