



Pennsylvania MEDICAL SOCIETY

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INDEPENDENT REGULATORY
REVIEW COMMISSION

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September 19, 2007

Melanie Zimmerman,
Executive Secretary
Department of State
State Board of Pharmacy
P.O. Box 2649
Harrisburg, PA 17105-2649

RE: Proposed Sales of Hypodermic Needles and Syringes

Dear Ms. Zimmerman,

As President of the Pennsylvania Medical Society, I am writing to express concern regarding the proposed sales of hypodermic needles and syringes regulations published for comment in the August 25, 2007, *Pennsylvania Bulletin*.

The Pennsylvania Medical Society could not support the proposed changes until the following qualifications are studied:

- That the proposed regulations not act to increase the number of IV drug users;
- That syringe exchange programs be bolstered to encourage intravenous drug users to become drug free;
- That pharmacies be required to provide materials that educate illicit drug users about the associated risks and encourage drug use withdrawal, and educational resources are made available throughout the state;
- That insurers be mandated to preserve reimbursement for diabetics and other medical conditions requiring injected medications;
- That syringes be kept in the prescription area of the pharmacy, defined as where prescriptions are stored, compounded, or where other activities for the practice of pharmacy occur, not including the waiting counter;
- That drug paraphernalia laws be reviewed and changed to accommodate the proposal;
- That the age limit and the number of syringes should be eliminated as restrictions; and
- That more information be gathered from other states where needles and syringes are available over the counter regarding how they address these issues and their results.

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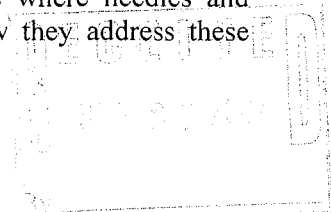
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The Pennsylvania Medical Society strongly urges the State Board of Pharmacy consider these issues prior to the publication of the regulation as final.

Sincerely,



Mark A. Piasio, MD
President

Cc: Honorable Robert M. Tomlinson, Chair
Senate Consumer Protection and Professional Licensure Committee
Honorable P. Michael Sturla, Chair
House Professional Licensure Committee
Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
Patricia A. Epple, CAE
Pennsylvania Pharmacists Association

