



VALLEY FORGE
MEDICAL CENTER
& HOSPITAL

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INDEPENDENT REGULATORY
REVIEW COMMISSION

September 21, 2007

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

RE: Proposed Rulemaking:
Sales of Hypodermic Needles and Syringes, 49 Pa. Code Ch. 27

Dear Ms. Zimmerman:

On behalf of Valley Forge Medical Center & Hospital, I am writing you to urge adoption of this proposed rule change, which would permit Pennsylvania pharmacists to sell up to 30 hypodermic needles and syringes to persons 18 years of age or older without a prescription.

Valley Forge Medical Center & Hospital is dedicated to providing comprehensive treatment to adults with substance abuse and associated physical, social, and psychological disorders. We also specialize in providing treatment to persons with HIV/AIDS.

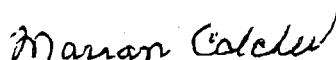
We agree with the Pharmacy Board's conclusion that increased access to clean needles and syringes is essential to the compelling public health interest in reducing the spread of hepatitis C virus (HCV) and HIV. We also agree with the Board's conclusion that this regulatory change will not result in increased drug use. We believe that this policy change will contribute to a reduction in HIV and HCV transmission among injection drug users within Pennsylvania, and that the continuation of a prohibition on pharmacy sales without a physician's prescription is indefensible.

This regulatory change is particularly important in Pennsylvania, given that there are only two locations (Philadelphia and Pittsburgh) in which legally authorized syringe exchange programs currently operate. These two programs alone are simply not adequate to address this problem across the entire state. We believe that for many injection drug users who cannot or will not participate in these exchange programs, pharmacy syringe sales are a critical means of addressing the problem of HIV and HCV transmission.

The proposed regulatory change will bring Pennsylvania more into line with the national trend in making sterile needles and syringes available as a means of reducing transmission of bloodborne diseases, most notably HCV and HIV, through the elimination or reduction of syringe sharing by injection drug users. Currently, the vast majority of states allow the retail sale of syringes and needles without a prescription; only two states (other than Pennsylvania) and the Virgin Islands continue to impose a prescription requirement for pharmacy sales. During the past decade, in response to this public health issue at least nine states (California, Connecticut, Maine, Massachusetts, Minnesota, New York, New Hampshire, Illinois, and Rhode Island) have all abandoned the prescription requirement, just as the Pharmacy Board has proposed for Pennsylvania.

We applaud the Pharmacy Board for proposing this valuable change in syringe access policy, and upon its adoption, we look forward to supporting local pharmacists in our communities as they undertake non-prescription syringe and needle sales.

Sincerely,



Marian Colcher, LSW, MSW
President