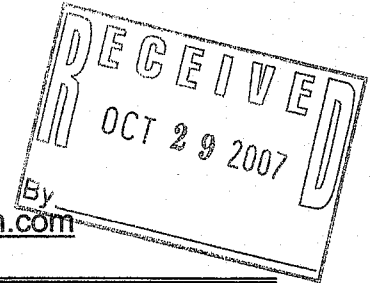


#2640

Patricia Clancy Kienle  
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October 26, 2007

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

Dear Ms. Zimmerman,

I have a concern with the wording of the proposed §27.17(a) as published in the Pennsylvania Bulletin on September 29, 2007. It does not appear to allow properly trained and supervised pharmacy technicians to access or transport controlled substances. Additionally, it restricts nursing access to Registered Nurses.

In hospitals, properly training and supervised technicians should be allowed to receive, assist with inventory functions, prepare for pharmacist checking and transport controlled substances. Automation provides adequate checking mechanisms to ensure appropriate control; manual systems can also be designed to ensure control. The pharmacist in charge should be responsible for establishing systems which provide the control required by laws and regulations and expectations of best practices.

In most hospitals, LPNs administer medications. This requires their access to controlled substances, within laws and regulations and organizational policies and procedures.

The January 2007 changes to the hospital Conditions of Participation (Federal Register, volume 71, number 227, November 27, 2006, page 68694) require that hospitals adopt policies to comply with the security of medications, with particular emphasis on controlled substances:

§ 482.25 Conditions of participation: Pharmaceutical services

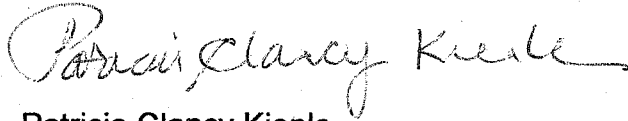
- (2)(i) All drugs and biologicals must be kept in a secure area, and locked when appropriate.
- (ii) Drugs listed in Schedules II, III, IV and V of the Comprehensive Drug Abuse Prevention and Control Act of 1970 must be kept locked within a secure area.
- (iii) Only authorized personnel may have access to locked areas.

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This document must be used by hospitals to identify specific security and what personnel are authorized to access controlled substances.

I would be happy to provide additional information if requested.

Sincerely,



Patricia Clancy Kienle  
RP028405L

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