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COMMONWEALTH OF PENNSYLVANIA
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DEPARTMENT OF STATE
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INDEPENDENT REGULATORY
REVIEW COMMISSION

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January 18, 2008

Sabina I. Howell, Esquire
P.O. Box 2649
Harrisburg, 17101-2649

Dear Ms. Howell:

The State Board of Pharmacy (Board) reviewed the proposed regulations of the State Board of Medicine pertaining to nurse midwife prescriptive authority. The Board understands that the definition of "legend drug" was taken directly from Act 50 of 2007, however the Board would like to note that the phrase "Caution: Federal law prohibits dispensing without a prescription." is no longer used on product labels. Current product labels contain the phrase "Rx only."

The Board has no other comments to offer. Thank you for the opportunity to comment on these proposed regulations.

Sincerely,

Carole L. Clarke, Esquire
Counsel, State Board of Pharmacy

cc: Melanie Zimmerman, Executive Secretary
State Board of Pharmacy