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#2662

January 22, 2008

Independent Regulatory Review Commission
333 Market Street, 14th floor
Harrisburg, PA 17101

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INDEPENDENT REGULATORY
REVIEW COMMISSION

RE: ID#16A-5417 (2662)

Dear IRRC Commission:

The Pennsylvania Pharmacists Association supports the provisions contained within the regulations of #16A-5417 (2662).

We believe the clarification that CE credit is only through ACPE (Accreditation Council for Pharmacy Education) courses or courses approved in advance by the State Board of Pharmacy will alleviate any misinterpretation of this requirement. We obviously support the ACPE name change since ACPE has changed its name, and also it is accurate that ACPE does not individually approve courses but rather providers, who must approve courses against certain criteria.

In addition, we believe there should be a six month opportunity to complete insufficient CE credits is appropriate. And most importantly, we strongly support the requirement that two-hours of CE in any biennial renewal period be dedicated to "Patient safety" topics. It is crucial to have continued focus on safety and preventing medication errors. Our Association has already made a commitment to offer at least one program on a related topic at each of our annual conferences.

Thank you for your consideration of our comments on this regulation package. We urge the final adoption of this.

Sincerely,

A handwritten signature in cursive script, appearing to read "Patricia A. Eppler".

Patricia A. Eppler, CAE
Executive Director