

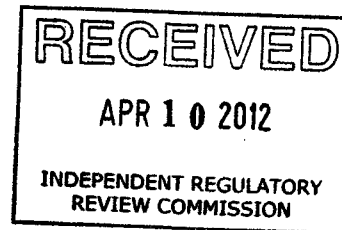
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April 2, 2012

2931.

Ms. Teresa Lazo  
Assistant Counsel  
Pennsylvania Department of State  
P.O. Box 2649  
Harrisburg, PA 17105-2649



Re: Proposed new rule 49 PA. CODE CH. 16.  
Proposed amendment to §16.92 (relating to prescribing, administering and dispensing)

Dear Ms. Lazo:

On behalf of the 5,000 nurses and health care workers represented by JNESO District Council 1, IUOE/AFL-CIO in New Jersey and Pennsylvania, 600 of which work in Pennsylvania. We would like to address the proposed new rule 49 PA. CODE CH. 16 as it amends § 16.92 (relating to prescribing, administering and dispensing).

We support the rule change to add butalbital, carisoprodol and tramadol hydrochloride to the State's control substance list. Where we believe that most physicians act in an appropriate manner, it is vital to monitor those substances that have the potential to be improperly prescribed as the State has accurately outlined. Physicians are required to provide an objective examination before prescribing drugs in the first place and therefore requires no additional paperwork requirements.

As Pennsylvania proposes to become the 17<sup>th</sup> state to add these substances to its controlled substance list, as health care workers we have a moral, ethical and legal obligation to ensure the safety and well-being of the patients we serve. This rule changes will serve as a format for other states in the region to follow.

Sincerely,

Douglas A. Placa  
Director, Legislative and Political Affairs

Cc: President J. Campagna  
Executive Director V. Treacy