



NATIONAL ASSOCIATION OF
CHAIN DRUG STORES



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June 1, 2012

The Honorable Silvan B. Lutkewitte, III, Chairman
INDEPENDENT REGULATORY REVIEW COMMISSION
14th Floor, Harrisstown 2, 333 Market Street
Harrisburg, Pennsylvania 17101

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Dear Chairman Lutkewitte:

On behalf our members operating approximately 1,911 retail pharmacies in Pennsylvania, the Pennsylvania Association of Chain Drug Stores (PACDS) and the National Association of Chain Drug Stores (NACDS) are writing to express our joint support for the Board of Pharmacy's Final Omitted Regulation pertaining to the electronic prescribing of controlled substances (EPCS) which will be before IRRC on July 19th. The regulation will align the state's electronic prescribing efforts to the established requirements in the Drug Enforcement Administration's (DEA) March 31, 2010 interim final rule, which permits the electronic transmission of all controlled substances prescriptions.

In permitting the electronic transmission of controlled substances, the DEA has eliminated one of the key barriers to widespread adoption of e-prescribing. This will enable healthcare providers to fully employ e-prescribing in their practices, which will serve to encourage greater use of this beneficial technology.

Chain pharmacy supports use of technology to electronically transmit prescription information between prescribers and pharmacists, as this practice benefits patients and healthcare providers alike. Pharmacies are working diligently to make the necessary changes to their systems and operations to implement EPCS. Use of e-prescribing technology increases operational efficiencies and enhances the level of accuracy. Through e-prescribing practices, pharmacies have worked to improve the quality of patient care and to deliver efficient and cost-effective care to patients.

We applaud both the Board and IRRC for taking steps to update Pennsylvania's pharmacy regulations to further facilitate e-prescribing. We believe that ultimately, these proactive actions will serve to improve patient safety, increase efficiencies in the healthcare system, reduce prescription fraud and diversion and reduce overall healthcare costs in the Commonwealth.

We look forward to continuing to partner with you on these objectives. Please do not hesitate to contact either of us, Janet Hart at jhart@riteaid.com or Jill McCormack at jmccormack@nacds.org, if we may be of assistance to you on this or any other pharmacy issue.

Sincerely,

Janet Hart, RPh, President
Pennsylvania Association of Chain Drug Stores

Jill McCormack, Regional Director
State Government Affairs
National Association of Chain Drug Stores