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ERIE, PENNSYLVANIA  
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September 4, 2012

Kerry E. Maloney, Board Counsel  
State Board of Pharmacy  
P.O. Box 2649  
Harrisburg, PA 17105-2649

Dear Mr. Maloney,

I wanted to write in regards to *Pennsylvania Bulletin*, Reference No. 16A-5424 (pharmacy internship) specifically as it relates to two items:

I thank the Board for their consideration regarding a decrease in the independent hours needed for PA interns to license from 750 to 500 hours. As an academic advisor and director of controlled internships, I feel that this change will assist students greatly in focusing on their studies during the academic year (which for LECOM is year round), and potentially to enable more students to partake in earning hours within a company or institution. This change may also be of benefit to our pharmacy residency program in order to recruit students from outside of Pennsylvania

I also appreciate that the Board looks to place responsibility of reporting a withdrawal from pharmacy school on the pharmacy intern. Currently, I audit withdrawals from our program, and though I believe it would be helpful to the Board to still have pharmacy schools report this information periodically, students sometimes fall back in their studies without permanent withdrawal which makes this determination a little more nebulous. The intern is most aware of their student "status" and whether their intention is to stop pursuit of a pharmacy degree, so they are in the best position to surrender their license.

On a side note, I hope in the future the Board will also consider eliminating the statement "Only a pharmacist may counsel" from regulations and allow interns, under the direct supervision of a pharmacist to also counsel. ACPE accreditation standards hold schools responsible for counseling experience which can only be partially fulfilled through simulation; more importantly, patients deserve practitioners versed in this skill.

I appreciate the Boards diligent review in meeting the needs of PA citizens and pharmacists. Please let us know what we at LECOM can do to ever assist the Board in its efforts and initiatives.

Sincerely,

Mary Elizabeth Ray, BS Pharm, PharmD  
Director, Office of Experiential Education

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