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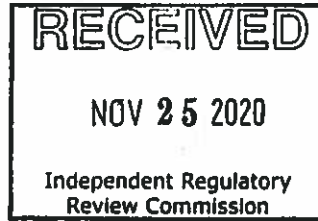


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November 23, 2020

Juan A. Ruiz, Esq., Board Counsel
State Board of Pharmacy
P.O. Box 69523
Harrisburg, PA 17106-9523
RA-STRegulatoryCounsel@pa.gov



**Re: IRRC # 16A-5429 - State Board of Pharmacy Proposed Regulations: Administration of
Injectable Medications, Biologicals, and Immunizations**

Dear Mr. Ruiz:

On behalf of the Pennsylvania Osteopathic Medical Association (POMA), I write to provide our comments on IRRC # 16A-5429.

Generally, POMA believes the proposed regulations conform to the implementing law, Act 8 of 2015. Specifically, POMA applauds the Board for the strengthening clarification to include notification to the patient's primary care physician and shortening the timeframe from 72 hours to 48 hours for this communication to occur. POMA believes this is a step in the correct direction and again supports the Board's efforts in this regard.

However, POMA must point out that while both the Pharmacy Act, its current regulations and this proposed rulemaking, require robust communication from the pharmacist to the physician, in practice, our Osteopathic physician members report this does not occur regularly. Osteopathic physicians understand the value of our pharmacist partners in the healthcare system and the access to vaccinations they can provide. Again however, Osteopathic physicians express frustration when they do not have knowledge when their patients are receiving vaccinations at the pharmacy. POMA recognizes this may be out of the scope of this regulatory draft, but while POMA applauds the Board for its efforts to strengthen the communication requirements in this proposed rulemaking, if the communication does not occur in the first place, strengthening the regulations will have little impact.

Thank you in advance for your consideration of these comments.

Sincerely,

Gene M. Battistella, DO
POMA President