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To: [Witkowski, Terry \[IBPE\]](mailto:Witkowski_Terry@IBPE)
Cc: apudlo@iarx.org
Subject: Public Comment Received on ARC 2288C
Date: Tuesday, December 29, 2015 4:12:34 PM

A new public comment has been received on **ARC 2288C**. The comment and contact information are listed below.

Comment

December 29, 2015 Iowa Board of Pharmacy 400 S.W. Eighth Street, Suite E Des Moines, IA 50309-4688 Dear Iowa Board of Pharmacy: The Iowa Pharmacy Association would like to submit comments to the Board of Pharmacy regarding the Notice of Intended Action (ARC 2288C) approved by the Board on November 4, 2015, to amend Chapters 6 and 8 of Iowa Administrative Code that would implement 2015 Iowa Acts, Senate File 462, which authorizes the prescribing of epinephrine auto-injectors in the name of a facility, a school district, or an accredited nonpublic school. While IPA did not register in support or against 2015 Iowa Acts, Senate File 462, we recognize the concern and need for distribution of medications in emergency situations addressed this legislation. IPA supports ongoing collaboration with necessary stakeholders to implement community-based public health programs where pharmacists provide medications to be used in emergency or life-threatening situations. As these new regulations are implemented, education for healthcare professionals, patients, and caregivers about the appropriate use of medications like epinephrine during emergency or life-threatening situations will be essential. Upon evaluation of the proposed regulations, IPA acknowledges that the Board is appropriately integrating the legislation that was passed in 2015 while ensuring patient safety is not compromised. When these new regulations become effective, IPA believes it will be critical to educate pharmacies and their staff about this opportunity for facilities and schools to receive epinephrine and especially the need for counseling to the authorized individual(s) that would be administering the medication at those locations. IPA will support the Board of Pharmacy in educating our membership on the importance of this regulatory change. We have no further recommendations at this time. Thanks for the opportunity to provide feedback to the Board of Pharmacy. Sincerely, Kate Gainer, PharmD Executive Vice President & CEO Anthony Pudlo, PharmD, MBA, BCACP Vice President, Professional Affairs Iowa Pharmacy Association 8515 Douglas Avenue, Suite 16 Des Moines, IA 50322

Contact Information

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