

**From:** [no-reply@iowa.gov](mailto:no-reply@iowa.gov)  
**To:** [Witkowski, Terry \[IBPE\]](#)  
**Cc:** [apudlo@iarx.org](mailto:apudlo@iarx.org)  
**Subject:** Public Comment Received on ARC 2285C  
**Date:** Tuesday, December 29, 2015 3:20:24 PM

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A new public comment has been received on **ARC 2285C**. 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 2285C) approved by the Board on November 4, 2015 to amend and incorporate rules to align with updated federal regulations for voluntary participation in authorized collection programs for controlled substance disposal. From our perspective, these amended regulations align correctly with the updated DEA regulations for controlled substance disposal while not interfering with pharmacies ability to dispose of controlled substances referenced in other sections of the Board of Pharmacy regulations. As the Board of Pharmacy is aware, IPA has worked in cooperation with the Board to administer a medication disposal program that currently does not accept controlled substances. As this medication disposal program would evolve to accept controlled substances, these new regulations compliment the changes that we foresee in any change to the current medication disposal program. Therefore, IPA is supportive of these regulatory changes and 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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