



NH BOARD OF PHARMACY

PH 2301.07 – Drug Control in Ambulatory Patient Treatment Areas

Institutional Pharmacy Practice

ADMINISTRATIVE RULES PUBLIC HEARING

April 20, 2022

Good morning. My name is Kathy Bizarro-Thunberg, Executive Vice President with the New Hampshire Hospital Association (NHHA), representing all 26 of the state's community hospitals as well as all specialty hospitals. Thank you for the opportunity to present testimony on the adoption of emergency administrative rules Ph 2301.07 - Drug Control in Ambulatory Patient Treatment Areas.

At the end of December 2021, hospital pharmacy directors identified an emerging need to modify the Ph2300 administrative rules to support full course of new medications being requested to be distributed through hospital emergency departments to treat COVID-19 patients. We engaged the Board of Pharmacy in that conversation, and we appreciated their swiftness in agreeing to the critical need to open up the Ph2300 administrative rules to allow for emergency rules to be implemented immediately.

In addition, as part of that conversation, it was noted that medications to treat victims of sexual assault had recently changed due to national recommendations which would have conflicted with current Ph2300 administrative rules. The Board also agreed to incorporate an exception for dispensing full courses of medications to sexual assault victims in hospital emergency departments.

The hospitals have found that these two medication dispensing exceptions to the 72-hour supply maximums have been successful in supporting patients seeking care and assistance through hospital emergency departments. We support the adoption of these emergency rules as permanent rules. Thank you all again for your attention to our hospitals' and our patients' immediate needs.

Thank you for the opportunity to present our testimony.