



NH BOARD OF PHARMACY

PH 2500 – Automated Pharmacy Systems

ADMINISTRATIVE RULES PUBLIC HEARING

March 16, 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. NHHA would like to present testimony on the draft Ph 2500 administrative rules for Automated Pharmacy Systems.

We appreciate the Board of Pharmacy’s work to develop and put forward these draft rules to support automated pharmacy systems in a wide variety of settings. We also acknowledge that several changes have been made to clarify a few points that hospital pharmacy directors had suggested in prior drafts. Those include:

- Ph2507 – “Automated pharmacy systems for institutional settings”, has been renamed “Automated pharmacy systems for **hospital** settings”.
- Ph2507.02 (c) – was missing certified technicians from this item. It now reads “The filling, stocking or replenishing of drugs into the automated dispensing system shall be accomplished by a pharmacist, **certified technician**, licensed advanced pharmacy technicians, registered technicians, or nurse and shall occur through bar coding or other electronic technology used for item identification.”

We have one suggested edit under the Definitions section of the rules:

- Ph 2502 (c) Remote site: means a NH licensed long-term care facility, hospice facility, **hospital** or state or county correctional facility, that is not located at the same location as the provider pharmacy, at which pharmacy services are provided using an automated pharmacy system. (“Hospital” should be added to this definition.)

Thank you for the opportunity to present our testimony. I’d be happy to answer any questions.