

1101 Pennsylvania Avenue
Suite 600
Washington, DC 20004-2514
202.756.2227
202.756.7506 [fax]
www.accp.com



C. Edwin Webb, Pharm.D., M.P.H.
Director, Government & Professional Affairs

September 25, 2008

Department of Health and Human Services
Office of Public Health and Science
ATTN: Brenda Destro
Hubert H. Humphrey Building, Room 728-E
200 Independence Ave., SW
Washington, DC 20201

RE: RIN 0991-AB48

Dear Ms. Destro:

The American College of Clinical Pharmacy (ACCP) appreciates the opportunity to provide information and comment on the referenced proposed rule addressing the issue of “provider conscience regulation.” ACCP is a national professional and scientific society representing almost 10,000 clinical pharmacist practitioners, researchers, and educators. Our members have been among the profession’s leaders for almost three decades in developing and providing clinical pharmacy services, consultation, cutting-edge clinical research, and educational programs that improve the quality of medication use in the broad range of health care settings in which they practice.

ACCP’s position statement entitled “Prerogative of a pharmacist to decline to provide professional services based on conscience” is included for the Department’s information. As can be seen from the statement, the position of ACCP is consistent with the stated purposes and goals of the department’s proposed rule providing for the appropriate protection of health professionals’ and other entities’ rights and prerogatives with regard to the provision of services or procedures that may violate the conscience of a health professional. As a result, ACCP supports the proposed rule as presented.

Consistent with the anticipated comments from the wide variety of health professionals, entities, and other stakeholders likely to comment, ACCP encourages the Department to provide for the implementation of these regulations using procedures and guidance that are efficient and minimally intrusive to the professional and business practices procedures of the affected entities.

Please feel free to follow up with us if we can provide further information or clarification.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Edwin Webb", is written in a cursive style.

cc: ACCP Board of Regents

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American College of Clinical Pharmacy • 13000 W. 87th St. Parkway • Lenexa, Kansas 66215-4530 • 913.492.3311
Michael S. Maddux, Pharm.D., FCCP, Executive Director