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

September 25, 2008

Drug Enforcement Administration  
ATTN: DEA Federal Register Representative/ODL  
8701 Morrisette Drive  
Springfield, VA 22152

**RE: Docket No: DEA-218**

Dear Sir/Madam:

The American College of Clinical Pharmacy (ACCP) appreciates the opportunity to comment on the notice of proposed rule making published in the June 27, 2008, issue of the *Federal Register* concerning electronic prescriptions for medications covered under the Controlled Substances Act. 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 wishes to draw your attention to a very specific concern that is not adequately addressed in the NPRM and which, indeed, may not be fully understood by the DEA based on the reiteration in the NPRM summary of its regulatory relationship with **pharmacies rather than pharmacists**. Specifically, we would call your attention to the fact that the authority of pharmacists to practice collaborative drug therapy management (CDTM) under collaborative practice agreements with physicians in 45 of the 50 states can and does result in the authority of appropriately credentialed pharmacists to prescribe controlled substances under such agreements and protocols. Of course, this authority varies among the states and may not be present in all such collaborative practice agreements.

**Consequently, ACCP urges that the final rules promulgated by DEA provide for recognition of this authority by including pharmacists, along with physician assistants and advanced practice nurses, when referring to those health professionals recognized by an "appropriate State authority" to issues prescriptions for controlled substances.**

ACCP believes that the benefits suggested in the NPRM's summary of the proposed rule are both real and achievable. Undoubtedly, DEA will receive a wide range of comments from the various other practice sectors of pharmacy identifying needed changes and adjustments to the proposed rule. We encourage your careful consideration of those comments in order to achieve electronic prescribing processes and standards for controlled substances that will effectively integrate with the processes and broad goals for all types of electronic prescribing.

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 over a light blue horizontal line.

cc: ACCP Board of Regents

**Providing Leadership in Clinical Pharmacy Practice and Research**

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