

Comments on Public Health Committee Bill No. 5610  
HB5610

March 11, 2011

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Dear Representatives and Senators,

I have a few comments and concerns related to HB 5610. As a pharmacist practicing in the clinical hospital setting, I believe my insight into the impact and implementation of HB 5610 will be of great value to the committee members.

Key points to consider:

- 1. HB 5610 implies that the condition of Epilepsy deserves special status compared to other medical conditions.

Comment: There are other medical conditions that should receive similar consideration. For example, organ transplantation where narrow therapeutic index/critical dose (NTI) medications are routinely used and where the consequences of medication failure are immediately life threatening. See the request from the Yale-New Haven Transplantation Center to have HB 5610 also will apply to specific transplant medications.

Suggestion: Amend HB 5610 to allow for application to other medical conditions.

- 2. HB 5610 implies that medications prescribed for epilepsy should be treated in a uniform manner.

Comment: Only a few of the medications used to manage epilepsy or transplantation for that matter, are truly NTI. Typically, NTI medications have narrow range between efficacy (preventing rejection) and a toxic adverse effect (kidney failure).

Suggestions: Amend HB 5610 to specify that only NTI medications would be covered. A list of NTI medications should then be established for Connecticut.

- 3. Medication access

Comment: HB 5610 may have the unintended consequence of reducing patient access to medication since the pharmacist may return the prescription to the patient if the prescriber does not approve the use of an alternative formulation or if the prescriber cannot be reached.

Suggestions: Do not pass HB 5610 because it may reduce patient access to critical medication.

4. HB 5610 will clearly increase the dispensing of "Brand name" medications which are far more costly than their generic counterparts.

Comment: The financial impact of HB 5610 on the State of Connecticut should be prospectively measured so the committee can consider accordingly.

5. The word "distributor" should be removed from the HB 5610 since the distributor has no impact on the quality of the medication. The focus of HB 5610 should only be on the manufacturer.

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