

**Testimony before the Public Health Committee
March 7, 2016**

Good Afternoon Senator Gerratana, Representative Ritter and members of the Public Health Committee. My name is Margherita Giuliano. I am a pharmacist and Executive Vice President of the Connecticut Pharmacists Association, a professional organization representing close to 1,000 pharmacists in the state. We also represent the Academy of Medical Marijuana Dispensaries which is comprised of the six facilities serving registered patients today.

I am here today to strongly oppose SB 352 *An Act Concerning Prescriptions for and the Dispensing of Opioid Antagonists*.

The purpose of this proposed bill is “to permit prescribing practitioners to issue a standing order to pharmacists to permit them to dispense an opioid antagonist in a nasal form to a person without a patient specific prescription.”

A pharmacist does not need a standing order because he or she already has the authority to prescribe opioid antagonists.

This complicates what is already a simple process. Specifically, in section 1 (b) the language states that a pharmacist who agrees to accept a standing order issued under subsection (a) of this section and dispenses an opioid antagonist in accordance with the provisions shall be deemed not to have violated any standard of care for a pharmacist. No standard of care is impacted since nowhere is the dispensing function delegated in health care law. Even if a physician dispenses a drug in the office, he or she has to be the one who dispenses it.

Pharmacists have the authority to prescribe which makes a standing order not necessary. Standing orders are for the *administration of* drugs such as vaccines. They are not appropriate for situations like this, when a pharmacist may be prescribing and dispensing to someone other than the end user of the drug. Many of you may also be aware that the CPA and the UConn School of Pharmacy, in conjunction with the Dept. of Consumer Protection, have launched a certification process for educating pharmacists on this new initiative. Over 140 pharmacists have completed the program as of the end of February.

The CPA has also checked in with state agencies to see if there was something we were missing on the need for this bill. The state employees we talked to are also unsure of the origin or need of this bill and do not support it as written. We recommend that SB 352 not receive support from this Committee as it adds yet another bureaucratic layer to the issue of prescribing and dispensing opioid antagonists that is unnecessary, and is also contradictory to the very positive efforts by the Governor to tackle opioid abuse.

The CPA continues to advocate a role for pharmacists when discussing ways that the state could save money in this arena. This is not one of them.