



American Pharmacists Association®

Improving medication use. Advancing patient care.

APhA

October 26, 2011

Vinayak Jha, MD
Assistant Professor of Medicine
Division of Pulmonary and Critical Care Medicine Department of Medicine
GW Medical Faculty Associates
2150 Pennsylvania Avenue NW, Suite 5-425
Washington, DC 20037

[Submitted electronically to vjha@mfa.gwu.edu]

Dr. Jha,

Thank you for the opportunity to review and provide comment on the proposed legislative language for consideration by the Council of the District of Columbia (DC). APhA, founded in 1852 as the American Pharmaceutical Association, represents more than 62,000 pharmacists, pharmaceutical scientists, student pharmacists, pharmacy technicians, and others interested in improving medication use and advancing patient care. APhA members provide care in all practice settings, including community pharmacies, hospitals, long-term care facilities, community health centers, managed care organizations, hospice settings, and the uniformed services.

We sincerely appreciate your interest in APhA's policy on tobacco sales as you advocate for changes to the DC Official Code. APhA has had policy positions opposed to tobacco sales in pharmacies for almost 30 years. The policy statement passed by the 2010 APhA House of Delegates is the strongest yet. APhA's policy reflects a belief that removing tobacco sales from community pharmacies will enhance the recognition of pharmacists as health care providers and position community pharmacies (independent, chain, supermarket-based, mass-merchandise and others) as health care destinations.

The proposed legislative language additions to the DC Official Code align with APhA's policies and we therefore are supportive of its intent. Please note that we are able to indicate our support for the proposed legislative language only and would appreciate any documentation reflecting that support. As an organization that represents pharmacists, pharmaceutical scientists, student pharmacists, and pharmacy technicians in all practice settings, we are concerned with the way the background information is framed and are therefore unable to support the rest of the document.

(over)

Additionally, we recommend that APhA be listed as a national organization that supports the proposed legislative language, given we represent members in all 50 states, DC, Guam, and Puerto Rico. Several of the organizations listed in the DC category are national organizations as well and should be recognized as such.

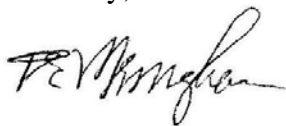
For your reference, included below is APhA's policy on the Sale of Tobacco Products.

2010 Discontinuation of the Sale of Tobacco Products in Pharmacies and Facilities that Include Pharmacies

1. APhA urges pharmacies and facilities that include pharmacies to discontinue the sale of tobacco products.
2. APhA urges the federal government and state governments to limit participation in government-funded prescription programs to pharmacies that do not sell tobacco products.
3. APhA urges state boards of pharmacy to discontinue issuing and renewing licenses to pharmacies that sell tobacco products and to pharmacies that are in facilities that sell tobacco products.
4. APhA urges colleges of pharmacy to only use pharmacies that do not sell tobacco products as experience sites for their students.
5. APhA urges the Accreditation Council for Pharmacy Education (ACPE) to adopt the position that college administered pharmacy experience programs should only use pharmacies that do not sell tobacco products.
6. APhA urges pharmacists and student pharmacists who are seeking employment opportunities to first consider positions in pharmacies that do not sell tobacco products.

We appreciate the opportunity to provide comments on this issue. If you have any questions or comments, please contact Brian Lawson, Associate Director, Governance at blawson@aphanet.org or by phone at 202-429-7548.

Sincerely,



Thomas E. Menighan, BSPharm, MBA, ScD, FAPhA
Executive Vice President and CEO

TEM/bel

Cc: Mitch Rothholz, RPh, MBA, Chief Strategy Officer
Brian Gallagher, BSPharm, JD, Senior Vice President, Government Affairs
Steve Benson, General Counsel
Brian Lawson, PharmD, Associate Director, Governance