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Via electronic mail: OPLC-Rules@oplcnh.gov

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New Hampshire Board of Pharmacy
Office of Professional Licensure & Certification
7 Eagle Square
Concord NH, 03301

Re: Comments on proposed rule to Ph 2600 Rule Pharmacist Initiation and Dispensing of Nicotine Cessation

Dear New Hampshire Board of Pharmacy,

I am writing to you in my capacity as Sr. Director of Regulatory Affairs for CVS Health and its family of pharmacies located across the United States. CVS Health's mission is to help patients on their path to better health. We are committed to patient safety, technological and process advances, and expanded pharmacy services that will assist in achieving our stated purpose. CVS Health thanks the Board of Pharmacy for considering our comments on the proposed rule Pharmacist Initiation and Dispensing of Nicotine Cessation.

CVS Health favors the rule Pharmacist Initiation and Dispensing of Nicotine Cessation but requests an amendment in the Pharmacist Record Keeping Procedures section, 2604.01. We respectfully request that an electronic version that contains all of the components of the NH Tobacco Cessation Self-Screening Patient Intake Form satisfy these record keeping requirements. Furthermore, we request that the electronic record include potential modifications to add additional self-screening questions, if deemed appropriate, and to provide flexibility in the formatting of the Intake Form. We offer the following language, which is based upon and modified from the Virginia Board of Pharmacy, as a suggested clarifying addition to your proposed rulemaking.

PART Ph 2604 PHARMACIST RECORD KEEPING PROCEDURES

Ph 2604.01 Recordkeeping Procedures. A pharmacist engaging in the initiation and dispensing of nicotine cessation therapy ~~the pharmacist~~ shall maintain records for a minimum of 4 years that include at least the following:

(a) A copy of the “NH Tobacco Cessation Self-Screening Patient Intake Form” completed by the Patient. Alternatively, a pharmacy may create and use an electronic routine tobacco cessation self-screening patient intake form if the collection of patient information and assessment process incorporates the New Hampshire Tobacco Cessation Self-Screening Patient Intake Form;

(b) A copy of the prescription if medication was dispensed and shall, at a minimum, include:

(1) The patient’s blood pressure reading; and

(2) All notes the pharmacist made related to the assessment and treatment plan.

CVS Health thanks the Board for welcoming comments which will increase access to tobacco cessation products to the citizens of New Hampshire and is aligned with CVS’ mutual imperative that pharmacists can leverage their full clinical ability to provide patient access to care. Please feel free to reach out to me directly at (313) 516-6915 and I will be happy to address any questions you may have.

Regards,



Grace Sesi, PharmD