



COALITION FOR NURSES IN ADVANCED PRACTICE

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April 30, 2013

Ms. Allison Benz, R.Ph., M.S.
Director of Professional Services
Texas State Board of Pharmacy
Delivery via Fax to (512)305-8008

Re: Rule 291.33 (c)(7)(A)(xii) and (c)(7)(D)(v)(I)(-e-) amendments proposed on March 8 2013.

Dear Allison:

The Coalition for Nurses in Advanced Practice (CNAP) supports the amendments to paragraph (c)(7)(A)(xii) and subparagraph (c)(7)(D)(v)(I)(-e-) that the TSBP proposed on March 8th. CNAP agrees the name of the practitioner or pharmacist who signed the prescription should be the only name that appears on the prescription label.

The current labeling rule that requires the dispensing pharmacist to include both the name of the advanced practice nurse (APN) who prescribed the drug and the APN's delegating physician creates confusion for patients. Many patients are not familiar with the APN's delegating physician and certainly did not see that physician when the medication was prescribed. In addition, lack of space on prescription labels and software programs that only allow entering one prescriber can make it difficult for pharmacists to comply with the current rule. Therefore, CNAP thinks these rule amendments, as proposed, will be positive for patients, practitioners and pharmacists.

Thank you for considering this comment. Please do not hesitate to contact me if you have any questions about the comment, or if I may help in clarifying issues involving APNs in the future.

Sincerely,

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