

**From:** Kim Haddock RPh  
**Date:** November 11, 2015 at 1:32:13 PM CST  
**To:** Jeanne Waggener  
**Subject: FW: Auto Refill Program Rule Question**

Dear Mrs. Waggener,

Below is correspondence I sent to Allison Benz regarding the rules and regulations about Auto Refill programs. She called me back and we discussed my suggestion to exempt hormones (testosterone) from the "no CIII meds on auto-refill". She told me to contact you about this to see if this could be brought up at a meeting for review. We discussed the reasoning behind putting the rules into place, and that some pharmacies were auto-refilling prescriptions without patient consent, so the rules are completely understandable. However, this is a program we just started about 3 months ago, and we ask our patients to fill out a form telling us which hormones they would like to auto-refill and we also get their signature (their "skin in the game", so to speak). We keep these consent forms on file for future reference, and could send you one to view, if you would like. We even have a procedure in our Standard Operating Procedures about customizing Auto Refill program per patient, as we ship out of state. Our system is set up to refill a standard 7 days in advance, but for someone in the Houston area, that just doesn't make sense. We customize that field for 2 days for in-house processing plus UPS transit time. So, in Texas, for example, we would fill 3 days in advance. The bottom line is the only controlled substance we dispense in our pharmacy is testosterone, which is a CIII, but is non-narcotic; the rational side of me says that the rules were made with the narcotics in mind. Testosterone is a hormone and is a maintenance medication for our patients. Please consider changing the rule to allow testosterone to be included in Auto-Refill programs.

Please don't hesitate to call me if you have questions or would like to discuss.

Thank you so much for your time and consideration,

*Kimberly Haddock, R.Ph*  
**Director of Pharmacy**

---

**From:** Kim Haddock RPh  
**Sent:** Tuesday, November 10, 2015 11:45 AM  
**To:** Allison Benz  
**Subject:** Auto Refill Program Rule Question

Hi Allison,

I called and spoke with Darrell today, and was referred to you about the Auto Refill Program rules and regulations. In 291.34, the rules of Auto Refill Programs are lined out. My particular question involves the controlled substance section (iii) "Auto-refill programs may be used for refills of dangerous drugs, and schedule IV and V controlled substances. Schedule II and III controlled substances may not be dispensed by an auto-refill program."

I completely understand the logic behind not placing controlled narcotic drugs on an auto-refill program; however, our pharmacy compounds testosterone hormone as hormone replacement therapy, and I'm having a tough time understanding why, even though testosterone is a controlled III drug, hormones would not be exempt from this section and be allowed to be auto-refilled with the patient's consent and within reasonable time limits. Would this be something to consider amending?

Thanks for your time and understanding,

*Kimberly Haddock, R.Ph*  
**Director of Pharmacy**

**Hotze Pharmacy**  
**20214 Braidwood Drive, Suite 140**  
**Katy, Texas 77450**  
**281-828-9088**