



Cardinal Health
Innovative Delivery Solutions
1330 Enclave Parkway
Houston, TX 77077
281.749.4000 tel

cardinalhealth.com

January 13, 2016

Jeanne Waggener, President
Texas State Board of Pharmacy
333 Guadalupe, Suite 3-600
Austin, TX 78701

Dear President Waggener:

Cardinal Health Pharmacy Services is a leading provider of pharmacy management services. Our business has origins in Texas, as the company was previously known as Owen HealthCare, which started more than 35 years ago in Abilene, TX. Working as a contract pharmacy service provider presents several challenges. Increasingly, the licensure of a hospital pharmacy is coming into question when the department is operated by a pharmacy management company.

For many years, there was a general agreement between the Texas State Board of Pharmacy, Department of Public Safety and Drug Enforcement Administration on the procedure for licensing hospital pharmacies operated by pharmacy management companies. A recent change in DEA enforcement policy has created a hardship for pharmacy management companies operating in Texas and could potentially interfere with the ability of hospital pharmacies in the state to obtain controlled substances to treat patients. I am requesting an opportunity to provide a brief presentation to the full Board of Pharmacy at your next meeting to explain how the change in policy by DEA creates a significant issue under existing Texas State Board of Pharmacy rules and policies and to suggest some potential rule changes to address this issue.

I would be happy to provide further background information once we confirm this issue can be added to the Board of Pharmacy meeting agenda.

A handwritten signature in cursive script that reads "Heidi Bragg, MBA, RPh".

Heidi Bragg, MBA, RPh
Director, Regulatory Management
Cardinal Health Pharmacy Services, LLC

cc: Gay Dodson, Executive Director, Texas State Board of Pharmacy