



SENATE EXECUTIVE DEPARTMENTS AND ADMINISTRATION COMMITTEE

May 8, 2019

HB 627 – Relative to rulemaking by the board of pharmacy on compounding

Testimony

Good morning, Madam Chair and members of the committee. My name is Paula Minnehan, Senior Vice President of State Government Relations for the New Hampshire Hospital Association (NHHA), and I am here representing all 26 of our state's community hospitals as well as all specialty hospitals.

NHHA has serious concerns with HB 627 as amended by the House and are opposed. We did not take a position on HB 627 as introduced in the House because the intent was to exempt veterinarians from the national compounding requirements of United States Pharmacopeia (USP) and instead would have had them default to New Hampshire Board of Pharmacy's rulemaking process. HB 627 did not impact hospital pharmacy operations and thus we did not attend the House ED&A discussions. We were surprised to learn of the changes to the bill when it was passed by the House.

The amendment that replaced the original bill changes the intent entirely and would remove USP requirements from all compounding pharmacies, not just veterinarians, and would default to the Board of Pharmacy's rulemaking. We are concerned that this will create differing standards for compounding pharmacies throughout NH. For example, hospital pharmacies must follow USP because their accreditation organizations, including the Joint Commission, DNV and CMS, require adherence to USP standards. Other private compounding agencies that don't have accreditation standards such as Joint Commission would only have to follow NH Board of Pharmacy rules if HB 627 passed as amended by the House. USP standards are quite comprehensive and follow strict evidence-based practice models with extensive national input before standards are adopted. We are concerned that the NH Board of Pharmacy rulemaking could not possibly be as extensive as the national standards and could, in fact, create contradictory standards between NH rules and USP.

We urge the committee to consider the original intent of HB 627 and not adopt the global changes proposed in the amendment passed by the House. In our opinion, the amendment language is a fundamental shift in compounding standards for NH and deserves much more scrutiny and input from stakeholders before such significant changes are implemented.

Thank you for the opportunity to provide our comments. I am happy to answer any questions you may have.