



December 10, 2008

Pharmacy Compounding Accreditation Board (PCAB)
Attention: Tom Murry, PCAB Executive Director
109 Church Street
Chapel Hill, North Carolina 27516

Re: Proposed Revisions to PCAB Principles and Standards

The Academy of Managed Care Pharmacy (AMCP) is pleased to provide comments to the Pharmacy Compounding Accreditation Board (PCAB) on the proposed revisions to PCAB principles and standards.

AMCP is a national professional association of pharmacists and other health care practitioners who serve society by the application of sound medication management principles and strategies to achieve positive patient outcomes. The Academy's 5,900 members develop and provide a diversified range of clinical, educational and business management services and strategies on behalf of more than 200 million Americans covered by a managed care pharmacy benefit.

The principles and standards developed by PCAB encourage compounding pharmacies to become accredited and utilize standards of practice developed by a panel of pharmacy compounding experts. By becoming accredited a pharmacy can display to prescribers and patients that it follows a set of national best practices in pharmacy compounding.

The Academy commends the leadership role of PCAB in the promotion of accreditation principles and standards for compounding pharmacies. Accreditation principles and standards offer benefits to all parties involved. Patient benefits include enhanced awareness that their medication was prepared by well-trained staff in a controlled, contamination free environment that maximizes the safety and efficacy of the prescription prescribed by the physician. Prescribers benefit through the ability to customize prescriptions to the exact therapy required for patients, knowing that the prescription will be prepared exactly as ordered by a pharmacy staff that has been educated and trained in all aspects of compounding. Pharmacists benefit by demonstrating to the health care community that they work in a pharmacy that has met and follows principles and standards of an accredited body and that the pharmacy strives to ensure that the stability and sterility of the medication is consistent with its preparation, labeling, and intended use.

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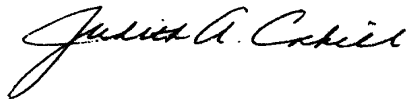
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AMCP recognizes that accreditation for compounding pharmacies is voluntary, but as patients and consumers become more aware of quality and accountability for services provided by pharmacy professionals, PCAB's principles and standards will become expectations. Compounding pharmacies should focus on PCAB accreditation and continuing education of the compounding pharmacy staff including all professional, technical and outsourced services staff. The pharmacy staff should have extensive understanding of the compounding scope of practice including: non-sterile basic, non-sterile complex and sterile preparations. Adopting PCAB principles and standards will reduce medication errors by encouraging appropriate training and education for pharmacy personnel.

The Academy recognizes the need to have a national set of principles and standards for accreditation of compounding pharmacies. AMCP congratulates PCAB and the panel of pharmacy compounding experts committed to patient safety and quality compounding. AMCP is pleased that PCAB principles and standards will set a standard for all compounding pharmacies, including community, hospital and ambulatory care pharmacies that prepare compounds as part of their services.

AMCP appreciates the opportunity to comment on the revised principles and standards. If you have any questions, please contact me at (703) 683-8416 or at jcahill@amcp.org.

Sincerely,

A handwritten signature in cursive script that reads "Judith A. Cahill". The signature is written in black ink and is positioned above the typed name and title.

Judith A. Cahill, CEBS
Executive Director