



American Society of
Health-System Pharmacists
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May 29, 2008

Health Resources and Services Administration
Department of Health and Human Services
Attention: Ms. Andy Jordan
8C-26 Parklawn Building
5600 Fishers Lane
Rockville, MD 20857

Re: RIN 0906-AA44 – Designation of Medically Underserved Populations and Health Professional Shortage Areas Notice of Proposed Rulemaking

Dear Sir/Madam:

The American Society of Health-System Pharmacists (ASHP) is pleased to submit comments pertaining to the designation of medically underserved populations and health professional shortage areas notice of proposed rulemaking (proposed rule). The Society's more than 30,000 members include pharmacists and pharmacy technicians who practice in a variety of health-system settings, including inpatient, outpatient, home care, and long-term-care settings.

In its proposed rule, the Health Resources and Services Administration (HRSA) notes that the existing Health Professional Shortage Areas (HPSAs) regulations contain criteria for the designation of pharmacy HPSAs. HRSA further states that these criteria were originally developed for use in connection with student loan repayment programs for individuals in pharmacy; however, these programs are no longer authorized or funded. Therefore, HRSA proposes to abolish the pharmacy designation.

ASHP strongly recommends that HRSA not eliminate pharmacy HPSAs. The Society is currently working with Congress to clarify that pharmacists are eligible to participate in the National Health Service Corps (NHSC). Pharmacists are the third largest health care provider in the United States, and they work collaboratively with physicians and nurses to provide the best patient care and outcomes. The pharmacist is the practitioner patients see the most, and is one of the most trusted of all health care professionals. However, like nursing and other health care professions, there is a shortage of pharmacists. This

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shortage is particularly burdensome in rural areas, but can be alleviated if Congress clarifies that pharmacists are eligible to participate in the NHSC.

Legislation has been introduced in Congress to include pharmacy in the reauthorization of the NHSC. Because pharmacists may soon be able to participate in the program, ASHP strongly recommends that HRSA not eliminate the HPSAs that will be required to determine the need for pharmacy services. Even without pharmacist participation in the program, the trends in need are important to monitor.

ASHP appreciates this opportunity to present its written comments in response to the proposed rule. Feel free to contact me if you have any questions regarding our comments. I can be reached by telephone at 301-664-8702, or by e-mail at jcoffey@ashp.org.

Sincerely,

A handwritten signature in cursive script that reads "Justine Coffey".

Justine Coffey, JD, LLM
Director, Federal Regulatory Affairs