













July 30, 2020

Alexandra Simon  
State Board of Pharmacy  
Controlled Substances and Drugs of Concern  
77 South High St, 17<sup>th</sup> Floor  
Columbus, OH 43215

**RE: Rule Number 4729:9-1-01 (Amend) Schedule I controlled substances.**

Dear Alexandra Simon,

On behalf of the American Association for Laboratory Accreditation (A2LA), I write regarding State of Ohio Board of Pharmacy rule number 4729:9-1-01 specifically as it pertains to forensic laboratories.

By way of background, A2LA is a non-profit, accreditation body with over 3500 actively accredited certificates representing all 50 states including more than 180 organizations accredited in Ohio. We have been granting accreditation to testing laboratories in various industries since 1979. The criteria forming the basis for our laboratory accreditation program is ISO/IEC 17025 General requirements for the competence of testing and calibration laboratories. We ourselves, as an accreditation body, have been evaluated against rigorous standards in providing this accreditation service and are recognized globally as an International Laboratory Accreditation Cooperation (ILAC)-recognized accreditation body.

I am contacting you to provide input on rule number 4729:9-1-01 specifically as it pertains to forensic laboratories. I wish to take this opportunity to recommend language that relies on an existing, well-vetted laboratory accreditation framework. The recommended language is inserted in **bold**:

Section (A); Part (3) "A report from an established forensic laboratory" means a laboratory report from the bureau of criminal identification and investigation, or a laboratory operated by another law enforcement agency, or a laboratory established by or under the authority of an institution of higher education that has its main campus in this state and that is accredited by the association of American universities or the north central association of colleges and secondary schools, **or a laboratory who is accredited in the forensic field to ISO/IEC 17025 by an International Laboratory Accreditation Cooperation (ILAC) recognized accreditation body**. Primarily for the purpose of providing scientific services to law enforcement agencies and signed by the person performing the analysis as defined in division (A) of section 2925.51 of the Revised Code.

This recommended language will achieve the current intent of the proposed rules language, while relying on an existing, formally recognized, accreditation system that is widely used nationally in the forensic industry and provides parties with a choice of accreditation bodies and laboratories.

If you have any questions about A2LA or the A2LA forensic accreditation program, please feel free to contact me at my direct line (301) 644-3221 or via email at [rquery@A2LA.org](mailto:rquery@A2LA.org).

Sincerely,

Randall Query  
Director Government Relations  
American Association for Laboratory Accreditation (A2LA)

# Rule Comments - 8.27.2020 - Public Hearing

**Mcnamee, Cameron**

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**From:** Ernest Boyd <eboyd@ohiopharmacists.org>  
**Sent:** Wednesday, August 26, 2020 2:33 PM  
**To:** PRX-RuleComments  
**Subject:** comments on proposed rule 4729-5-8-04



## OHIO PHARMACISTS ASSOCIATION

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To: Ohio State Board of Pharmacy

Re: Rule 4729-5-8-04

Comments of Ohio Pharmacists Association by Ernest Boyd, Executive Director

Thank you for the opportunity to comment on proposed rule 4729-5-8-04. I am Ernest Boyd, Executive Director of the Ohio Pharmacists Association. Generally, the association is supportive of the rule, but we have concern with the reference to USP 800 in part D and E. At this time, USP has said that chapter 800 is informational only until the new 795 and 797 chapters are finalized. We request that reference to USP 800 as a requirement be delayed until the USP indicates that chapter 800 is effective.

Ernest Boyd, R.Ph., MBA  
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