



nabp
National Association of Boards of Pharmacy

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January 31, 2012

The Honorable Senator Dianne Feinstein
United States Senate
Washington, DC 20510

The Honorable Senator Jeff Sessions
United States Senate
Washington, DC 20510

RE: Senate Bill 2002

Dear Senators Feinstein and Sessions:

I am writing to express our strong support for Senate Bill 2002, the Online Pharmacy Safety Act. The National Association of Boards of Pharmacy[®] (NABP[®]) is the independent, international, and impartial association that supports its member boards of pharmacy in protecting the public health. Founded in 1904, NABP is the only professional association that represents the state boards of pharmacy in all 50 United States, the District of Columbia, Guam, Puerto Rico, the Virgin Islands, Australia, eight Canadian provinces, and New Zealand.

Over the past several years, NABP has been very active in working toward making the Internet a safer place to purchase prescription medications. One of our primary efforts has focused on informing regulators, health care professionals, and law enforcement personnel about the vast number and characteristics of illegal drug outlets in operation. Our most recent quarterly research report on this issue (which can be found at http://www.nabp.net/programs/assets/IDOI_Report_01-12.pdf) continues to indicate that more than 96% of sites offering prescription drugs for sale are doing so illegally. Of the 8,789 sites reviewed, 8,456 were found to be operating out of compliance with state and federal laws and/or NABP patient safety and pharmacy practice standards. These sites are listed as Not Recommended on the NABP Web site and have one or more of the following specific characteristics:

- 2,156 have a physical address located outside of the US
- 7,230 do not require a valid prescription
- 5,379 issue prescriptions per online consultation or questionnaire only
- 3,845 offer foreign or non-Food and Drug Administration (FDA)-approved drugs
- 1,467 do not have secure sites
- 3,004 have server locations in foreign countries

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- 8,265 appear to be affiliated with a rogue network
- 1,013 dispense controlled substances

Another one of NABP's primary efforts focuses on educating consumers about the dangers associated with purchasing drugs online. The NABP consumer Web site, www.AWARERX.ORG, provides patient-focused information about the dangers of counterfeit medicines and tips on how to select an online pharmacy from which to safely buy medicine. It also provides information about rogue Internet drug outlets, prescription drug counterfeiting, proper medication use, medication storage and disposal, and other medication safety issues. NABP provides the AWARxE™ consumer protection program as a resource not only for consumers, but also to help the boards of pharmacy, their licensees, and other stakeholders educate patients on medication safety.

NABP, along with FDA and other patient safety advocates, recommends that patients use Internet pharmacies accredited through the NABP Verified Internet Pharmacy Practice Sites^{CM} ([VIPPS](#)[®]) and Veterinary-Verified Internet Pharmacy Practice Sites^{CM} ([Vet-VIPPS](#)[®]) programs when buying medication online. These sites have successfully completed the thorough accreditation process, which includes a review of all policies and procedures regarding the practice of pharmacy and the dispensing of medications over the Internet, as well as an on-site inspection of facilities used by the site to receive, review, and dispense medications. We strongly support the reference to the NABP VIPPS and Vet-VIPPS programs in the Online Pharmacy Safety Act.

Illegal Internet drug sales pose a significant health risk to US citizens. NABP commends you for your commitment and determination in protecting our citizens' health and welfare by addressing this important issue through the introduction of the Online Pharmacy Safety Act.

Sincerely,

NATIONAL ASSOCIATION OF
BOARDS OF PHARMACY

Carmen A. Catizone, MS, RPh, DPh
Executive Director/Secretary