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August 29, 2024

**SUMMARY OF COMMENTS RECEIVED REGARDING  
PROPOSED RULE FOR 15 CSR 15 AND  
RESPONSES OF THE WV BOARD OF PHARMACY**

The proposed rules for 15 CSR 15 were filed for a Notice of Comment Period of proposed rule 15 CSR 15 on July 24, 2024 8am and the comment period closed August 23, 2024, at 9:00 am. The Board received one comment on the proposed rule. A copy of this summary is being provided to the commenter.

**Commenter:** Brian Sayre, PharmD  
Chief Pharmacy Officer  
Charleston Area Medical Center – Vandalia Health  
3200 MacCorkle Ave SE  
Charleston, WV 25304

**Comment 1: (on proposed rule change §15-15-12 Direct-to-Patient Delivery System**

I am on board with all of the above. Even the locker process could help immensely with Meds to Beds discharge patients by allowing us to get the meds to the patient when they leave. I could see this helpful for our night shift employees that want to get their meds before leaving work. We have adjusted our hours of operation (opening earlier and closing earlier) so they can pick up. However, they still have to wait. With something like this, we could open later and stay open later in the evening to provide pharmacist care to more patients at discharge.

**Response 1:** The Board appreciates the support for the proposed changes and the work being done to improve patient access to needed services and medications.



Capehart, Krista D &lt;krista.d.capehart@wv.gov&gt;

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**FW: [EXTERNAL] WV BOP July 2024 Newsletter**

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**Sayre, Brian E.** <brian.sayre@vandaliahealth.org>  
To: "Capehart, Krista D" <krista.d.capehart@wv.gov>  
Cc: "Moles, Heather M." <Heather.Moles@vandaliahealth.org>

Mon, Aug 12, 2024 at 2:13 PM

I am on board with all of the above. Even the locker process could help immensely with Meds to Beds discharge patients by allowing us to get the meds to the patient when they leave. I could see this helpful for our night shift employees that want to get their meds before leaving work. We have adjusted our hours of operation (opening earlier and closing earlier) so they can pick up. However, they still have to wait. With something like this, we could open later and stay open later in the evening to provide pharmacist care to more patients at discharge.

Anything that I can do to help in this arena, please let me know. Happy to assist.

Brian

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