

June 5, 2018

Nicole Dehner
Chief Legal Counsel
Ohio Board of Pharmacy
77 S High Street, 17th Floor
Columbus, OH 43215-6126

Dear Ms. Dehner,

Harm Reduction Ohio plans to distribute naloxone at no charge to drug users at risk of overdose, their families and friends, and in settings where overdose risk exists. We seek to clarify what the Board of Pharmacy believes is required for us to do this.

Harm Reduction Ohio is a 501(c)3 non-profit that seeks to reduce drug overdoses and the harms of drug use generally. We have considerable contact with drug users, their relatives and friends and often operate in settings where overdoses may occur. Our volunteers have administered naloxone to reverse overdoses on more than one occasion.

We believe Harm Reduction Ohio qualifies as a “service entity” under the meaning of SB 319, which defines “an entity that serves individuals who may be at risk of opioid-related overdose to procure naloxone for use in emergency situations.” In addition to administering, we believe Harm Reduction Ohio can distribute naloxone under:

- a physician-approved protocol specific to our organization, or
- an appropriately written county board of health protocol.

The latter would allow our volunteers to distribute Project DAWN naloxone in cooperation with county boards of health.

Harm Reduction Ohio believes county boards of health can effectively and legally distribute naloxone using properly trained volunteers without requiring those volunteers (or their 501(c)3 non-profit organizations) to obtain Terminal Distributor of Dangerous Drugs (TDDD) licenses.

In this effort to improve naloxone distribution in Ohio, your clarification would be appreciated.

Sincerely,

Dennis Cauchon
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