

From: [Waltraut Lehmann](#)
To: [Freeburg, Jim \(OIC\)](#)
Subject: CR-101 on rx substitution process (R 2016-22)
Date: Wednesday, August 24, 2016 4:01:27 PM

Hello Jim,

Our pharmacy team has reviewed the planned rulemaking for the prescription drug substitution process.

We respectfully urge your office to draft rules that match the federal rule language in 45 CFR 156.122 and apply the same standards for timeframes and reviews. In addition, we request that you circulate a draft of the rule language for stakeholder review and comment before moving to the formal rule proposal.

Thank you, Jim. Please let me know if you have questions.

Best regards,

Waltraut

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