



Indiana Economic Development Corporation
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August 31, 2012

Marty Allain
General Counsel
Indiana Professional Licensing Agency
402 W. Washington St. W072
Indianapolis, IN 46204

Dear Mr. Allain:

Pursuant to IC 4-22-2-28, the Indiana Economic Development Corporation (“IEDC”) has reviewed the economic impact analysis for small business associated with rule changes contained in LSA Document 12-414 and proposed by the Indiana Professional Licensing Agency (“IPLA”). The proposed rule adds 856 IAC 7 to establish standards applicable to any prescription drug take back program, entities that may participate in prescription drug take back programs, and guidelines and standards for prescription drug take back programs.

The economic impact statement prepared by the IPLA indicates that participation in the take back program is voluntary. Of the 1,400 pharmacies in Indiana, the IPLA estimates that 150 could be classified as small businesses. The IPLA states that costs that may be associated with voluntarily implementing a program authorized by this rule may be related to record keeping, security, and destruction. These costs would be de minimis given mandatory compliance with regulations already in place but could range between \$300-\$500 in initial costs for training and equipment, approximately \$100-\$200 for return and destruction of collected medications, and not more than \$100-\$200 per month for the return and destruction costs. The IPLA’s economic impact statement ultimately concludes stating that any costs for small businesses associated with voluntary participation in the program would likely be offset by the increased foot traffic.

The IEDC does not object to the economic impact to small businesses associated with the proposed rule. If you have any questions about the comments contained herein please contact me at 234-3997 or eshields@iedc.in.gov.

Regards,

A handwritten signature in black ink, appearing to read "Eric P. Shields".

Eric P. Shields
Policy Director