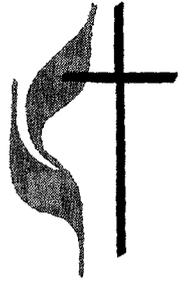


**United Methodist Western Kansas Mexican-American Ministries
Community Health Center and Community Centers**



2067 '00 DEC -1 P2:17

November 27, 2000

Margaret O'Rourke, Senior Regulatory Expert
Center for Drug Evaluation Research
Food and Drug Administration
5630 fishers Lane, RM 1061
Rockville, MD 20857

RE: Rules and Regulations (vol. 64, # 232, DOCID:fr03de99-20) that set up regulations for the acceptance, storage, and distribution of drug samples by charitable institutions

Dear Ms. O'Rourke:

While regulations and standards are necessary to insure safe delivery of drugs, including samples, our Board and staff feel strongly that the proposed new regulations go far beyond what is needed for public protection.

Over 75% of our clinic patients have no form of third-party pay: they are ineligible for Medicaid or Medicare and have no private insurance. For most, sample medications are the *only* way to provide needed treatment while staff attempts to find the appropriate medically indigent drug programs from pharmaceutical companies---and completes needed paperwork.

I urge you to consider the burden these regulations would place on primary health clinics and federally qualified health centers that serve primarily indigent and uninsured patients. Please, either revise the regulations or provide an exemption for non-profit primary care clinics such as the one operated by United Methodist Mexican-American Ministries.

Sincerely,

Penney Schwab

Penney Schwab
Executive Director

Cc: Governor Bill Graves
Senator Sam Brownback
Senator Pat Roberts
Representative Jerry Moran
Secretary Clyde Graeber

92N-0297

CH 13

Executive Director Medical Director

Penney Schwab Karen Nonhof
712 St. John, P.O. Box 766
Garden City, Kansas 67846
(316)275-1766 Fax: (316)275-4729
mam@gcnet.com

Community Developers

Donna Sanchez-Jennings 311 N. Grant-Box 1815 Liberal, KS 67901 (316) 624-6865	Jose Olivas 321 W. Grant Ulysses, KS 67880 (316) 356-4079	Isela Lerma 224 N. Taylor P.O. Box 766 Garden City, KS 67846 (316) 275-1766	Martha Mendoza 708 Ave. H Dodge City, KS 67801 (316) 225-0625
--	--	---	--

