

American Association of Clinical Endocrinologists

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February 28, 2008

The Honorable Michael Enzi
Ranking Republican
Senate Committee on Health, Education, Labor & Pensions
SD 644
Washington, D.C. 20510

ATT: Dave Schmickel

Dear Senator Enzi:

Thank you for contacting the American Association of Clinical Endocrinologists (AACE) to request comment on S. 877, "Controlling the Abuse of Prescriptions Act of 2007," which amends the Controlled Substances Act to add human growth hormone as a schedule III controlled substance and establishes a good faith standard for practitioners in dispensing prescriptions of controlled substances.

AACE guidelines on human growth hormone (HGH) use are in close agreement with the Food and Drug Administration (FDA) regulations on the appropriate use of HGH. I have enclosed a copy of the AACE guidelines on growth hormone use for your information. With the exception of a small number of medical conditions, the accepted use of HGH is proven growth hormone deficiency in children, adolescents and adults. However, a legitimate concern with respect to adding HGH to the list of schedule III controlled substances is that it may work to the disadvantage of children with short stature and other patients who would benefit from HGH by creating barriers to the access to the drug for legitimate health care needs, i.e. the number of pharmacies that can handle schedule III agents.

AACE is supportive of preventing the misuse of HGH, however we would hope that efforts to do so will be carefully crafted so as not to create inadvertent barriers to its specified use.

Please contact me if you have any questions or if I can be of any assistance.

Once again, thank you for the opportunity to comment on S. 877.

Sincerely,



Richard Hellman, MD, FACP, FACE
President

RH/sm
Enclosure

cc: Senator Charles Schumer
Donald C. Jones, CEO
Sara Milo, Director, Legislation, Governmental Affairs & AACE Chapters