

August 15, 2019

**Task Force on Research Specific to Pregnant and Lactating Women  
Public comments by the American Association of Colleges of Pharmacy**

The American Association of Colleges of Pharmacy (AACP) appreciates the opportunity to comment on the Task Force on Research Specific to Pregnant and Lactating Women report to the Secretary, Health and Human Services and Congress. AACP, founded in 1900, is the national organization representing pharmacy education in the United States. There are more than 6,500 faculty members, 62,000 student pharmacists and 4,500 graduate students (Ph.D. and M.S.) at pharmacy schools, and, collectively, these schools received over \$400M in federal research funding in fiscal year 2017. Pharmacy research includes biomedical, clinical and health services research, practice innovation and implementation science.

AACP commends the Department of Health and Human Services and the National Institutes of Health on the work of the task force so far and supports implementation of the recommendations put forward in the 2018 report. Fully implemented, these recommendations have the potential to lead to new treatments and more appropriate use of pharmacotherapeutic agents for pregnant and lactating women, enhanced training and continuing professional development for health care professionals, and improved regulatory frameworks and informational resources for patients and providers.

Pharmacists are the medication experts on a patient's healthcare team. The education and professional preparation of student pharmacists are guided by the Accreditation Council for Pharmacy Education (ACPE) Standards, most recently revised in February 2015<sup>1</sup>. Required elements of a pharmacy curriculum include medicinal chemistry, pharmaceuticals, clinical pharmacokinetics, pharmacology (including adverse effects and drug interactions), toxicology, law and ethics, drug information and evaluation, and pharmacotherapy. Pharmacists and scientists trained at colleges and schools of pharmacy bring this foundational knowledge of medications to their research investigations, clinical practice and teaching and mentoring.

Colleges and schools of pharmacy are home to the comprehensive study of drug development and use. Pharmacy research programs encompass:

- drug discovery and development,
- pharmacology, pharmacokinetics and pharmacodynamics
- pharmacotherapy and clinical study design, and
- patient-centered studies of drug utilization and medication adherence.

Many of the future investigators and clinicians, who will discover, develop and deliver evidence-based care for pregnant and lactating women, will be trained within pharmacy schools. AACP encourages the task force to include pharmacists and pharmacy research when considering programs for clinicians and research investigators. Eligibility requirements and program goals for research, training and career

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<sup>1</sup> <https://www.acpe-accredit.org/pdf/Standards2016FINAL.pdf>.

development awards should enable pharmacists, student pharmacists and residents to successfully compete for these awards.

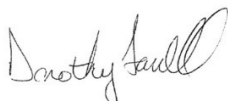
Pharmacists are accessible and well-trusted health care professionals and are typically the final point of contact for patients before medication use. Pharmacists:

- provide medication management and clinical decision-making support for patients and providers,
- provide advice regarding the use of prescription and over-the-counter medications during pregnancy and lactation,
- counsel on information related to adverse effects and drug interactions,
- answer questions about herbal remedies and dietary supplements, and
- advise providers on adjusting medications in women who are pregnant or breastfeeding.

Numerous studies have demonstrated that involving pharmacists in the care of patients with chronic conditions improves treatment adherence and patient outcomes. AACP encourages the task force to include colleges and schools of pharmacy, as well as pharmacy organizations, when planning awareness and communications strategies.

Academic pharmacy and the pharmacy research and practice communities will be crucial partners in increasing and improving the research base for therapeutics for pregnant and lactating women and expanding the research and clinical workforce. No other group is as expert in the properties of medicine. For questions or more information, please feel free to contact Dorothy Farrell, AACP Senior Director of Science Policy and Chief Science Officer, at [dfarrell@aacp.org](mailto:dfarrell@aacp.org) or 703-479-3830.

Sincerely,



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