

425.0005

STATE OF CALIFORNIA MINI-MEMO STD 100-B (REV. 9-7)	TO: HQ – Legal	SUBJECT: J--- S--- dba: S--- C--- SR -- XX-XXXXXX
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M	Mr. S--- was contacted and he states that State Licensed Acupuncturists
E	are considered primary physicians as far as prescriptions are concerned.
S	Has Regulation 1591 been expanded to include acupuncturists and their
S	writing of drugless substances prescriptions? He was unable to cite
A	the California law which changed this.
G	
E	

RETURN TO	SIGNED G. Jung	ADDRESS CH Compliance	PHONE ATSS 561-0348
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R	No. Acupuncturists are not persons “authorized to prescribe”
E	medicines under Reg. 1591(a)(1). Bus. & Prof. Code only permits
P	physicians, dentists, podiatrists or veterinarians to write
L	prescriptions for medicines. Acupuncturists may only “prescribe
Y	herbs as dietary supplements” under Bus. & Prof. Code 54937.

SIGNED John Waid	ADDRESS LEGAL	DATE 9/24/92
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SEND PARTS 1 AND 3 INTACT – PART 3 WILL BE RETURNED WITH REPLY