

July 29, 2010

Allison Benz, R.Ph., M.S.
Director of Professional Services
Texas State Board of Pharmacy
William P. Hobby Building
333 Guadalupe Street, Suite 3-600
Austin, Texas 78701-3942

Re: Class G Rules Proposed for Adoption

Dear Ms. Benz:

On behalf of HEB, I appreciate the opportunity to submit comments regarding the proposed new rules under §291.153 creating a new class (G) of pharmacy for Central Prescription Drug or Medication Order Processing.

First, allow me to express our support for these rules and to commend the Board for continuing to move the profession forward by considering alternate practice settings to optimize patient care. It is appropriate that a new class of pharmacy be created due to the limited activities performed in this setting and the fact there are no drug products stocked or dispensed.

This separation of work and restriction on the type of activities has proven to improve quality assurance and effectiveness along with creating an environment that makes it easier for pharmacists to supervise support staff.

Current Class A rules only require one registered technician while allowing up to 2 technician trainees. Furthermore, pharmacists in Class A pharmacies are typically supervising a wider variety of duties. While the proposed Class G rules allow more technicians, we have concerns that only allowing 1 trainee per pharmacist could limit the pharmacy's ability to train and groom prospective technicians in a trainee role.

We would respectfully ask the Board to consider amending the proposed rules to allow pharmacists to supervise up to 2 trainees within the overall 6:1 ratio. Due to the limited duties of supportive personnel within a class G pharmacy, we believe that this will not alter the superior effectiveness and safety of this model

(c)(4)(C) Ratio

(i) at least five four are pharmacy technicians and not pharmacy technician trainees...

Please contact me if you would need further information or clarification.

Respectfully,



Jay Bueche, R.Ph.
Director of Pharmacy Compliance & Regulatory Affairs
H.E.B.
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San Antonio, Texas 78201