



Texas Tech University  
Health Sciences Center  
SCHOOL OF PHARMACY

Office of the Dean  
Arthur A. Nelson, Jr., R.Ph., Ph.D.

April 30, 2009

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Ms. Gay Dodson, R.Ph.  
Executive Director of the  
Texas State Board of Pharmacy  
333 Guadalupe, Ste. 3-600  
Austin, TX 78701

RE: Proposed Amendments to Internship and Preceptor Requirements

Dear Gay:

I wish to express concern regarding proposed amendment to the above item that would “*eliminate the requirement that a preceptor have one year of experience in the type of internship practice setting and only require the preceptor to have a year of experience as a licensed pharmacist.*”

Our curriculum is designed to prepare practitioners with a knowledge and skill set that allows them to practice in any pharmacy environment. This requirement is mandated by ACPE Standard 9 “***The College or School’s professional degree program curriculum must prepare graduates with the professional competencies to enter pharmacy practice in any setting...***”

To meet this standard, we must ensure that students are with preceptors across multiple practice environments to learn the unique knowledge and skills to be an effective practitioner in each general practice environment upon graduation.

While the practice of pharmacy has many common skills, and drug knowledge is non practice focused, there are many different and unique aspects to practice sites that require the special application of the knowledge and skills. Important elements for one environment may not be applicable to other environments.

My major concern is for the students and their learning. If they are placed with a preceptor who is new to a type of practice, who doesn’t have an in depth awareness of the unique knowledge and skills required for that practice environment or the level of experience to know important concepts to emphasize and train the intern, then their time with that preceptor will not be optimum. The students have only one opportunity to build these site specific abilities during their professional curriculum. A preceptor new to a site, regardless of their passion for student learning, simply will not be able to meet the students’ needs to adequately prepare them for the practice.

While the current requirement may be hard to manage, I believe we can develop a mechanism to better address the concerns of staff in regulating this provision. For example, if we developed a checklist of the unique environments we need, preceptors could check-off their experiences to answer their own questions. I am certain there are more strategies to ease the administrative burden than simply removing the requirement and lose a very valuable element for credentialing our preceptors.

Thank you for considering this issue. Please don't hesitate to ask me to help resolve this issue if needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Art A. Nelson, Jr.", written in a cursive style.

Arthur Nelson, Jr., R.Ph., Ph.D.  
Dean, School of Pharmacy

AAN/slm

Cc: Texas Pharmacy Deans