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OF PHARMACY

July 24, 2013

**HAND DELIVERY**

Texas State Board of Pharmacy  
William P. Hobby Building, Suite 3-600  
333 Guadalupe Street  
Austin, Texas 78701

RE: **Pharmacist to Technician Ratio**

Dear Texas Board of Pharmacy,

I am the Chief Pharmacist at DaVita Rx, the first and largest full-service pharmacy created specifically for the unique needs of kidney patients. We have recently reached the milestone of dispensing 10 million prescriptions overall, and are proud to do so from our flagship pharmacy in Coppell, Texas. I want to thank you for researching the current ratio requirements for pharmacist supervision of technicians, specifically in Class A pharmacies. As we expressed in other communications, we are working with our pharmacist colleagues to advocate for and inform a decision to remove the ratio entirely. DaVita Rx understands the complexity of your responsibilities, and want to offer ourselves as a resource on this, or any issue before you.

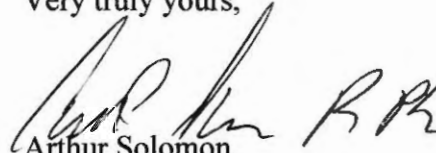
We believe the elimination of the ratio is critical for both growth of our pharmacy and growth of the pharmacy profession to allow for greater utilization of both pharmacists and pharmacy technicians. Pharmacist to technician ratios is an arbitrary model that is becoming restrictive to some of today's changing pharmacy practice settings and models. As the pharmacy work environment is evolving away from the be a non-standard setting in pharmacy, many pharmacies offer patients more than just dispensing prescriptions only – including performance of MTM or other specialized therapeutic reviews and patient adherence and persistence programs. Pharmacy technology has also advanced with automation, IVR systems, electronic processing, IVR, creative counseling solutions, etc. DaVita Rx has witnessed the Board being both thoughtful and proactive regarding technology and feels that the elimination of the ratio

would allow for a similar advance in innovation by enabling pharmacies to be flexible and maximization their resources to meet their specific patient needs. Allowing pharmacists to perform more professional services can lead to better compliance and patient safety as well as reduce healthcare costs and produce better outcomes.

Similarly, we believe elimination of this ratio requirement would be consistent with the Texas Legislature's recent passing of bills to eliminate other health licensing ratio requirements from the recent legislative session.

In closing, we ask for your consideration on this issue and hope that this elimination can be addressed at the Texas Board of Pharmacy meeting in August, or soon after. If we can provide further information or be a resource in any way, please do not hesitate to reach out to us. We appreciate your service to the State of Texas and pharmacy patients.

Very truly yours,



Arthur Solomon,  
Chief Pharmacist

**From:** david lee  
**Sent:** Monday, July 29, 2013 9:43 PM  
**To:** Gay Dodson  
**Subject:** Walmart Rph comment on pharmacist: technician ratio

Ms. Dodson,

My name is David S. Lee and am a pharmacist for Walmart pharmacy in Plano, Texas. I have been practicing in Texas for past 6 years in retail setting and have really enjoyed the growth of our profession especially in immunizations and MTM. Today I want to share with you my view on pharmacist, technician ratio. Both at Walgreens and Walmart, I have been involved in development and applying immunizations and MTM services to pharmacist daily workflow so I may have a different view on this matter.

When the discussion comes up about expanding the pharmacist: technician ratio, pharmacists often mention its negative impact on safety and deviation from an "ideal" pharmacist to technician ratio, among others. Ms. Dodson, you more then anyone else is aware of the changes happening in our profession and in our healthcare system. Recently, former president Bill Clinton was at a pharmacist meeting and addressed our roles. He said, for pharmacy profession to continue to grow, we must find voids in healthcare and be able to fill those voids. With pharmacy based services like immunizations, MTM, and preventative health services, we are finding those needs in healthcare and allowing our profession to grow.

But for the pharmacists to practice immunizations and MTM in retail pharmacies, they must have greater support. In 2009, during the H1N1 flu season, my pharmacy team in Plano administered 2700 flu shots in 45 days. As you are well aware, there was a real need in our community to vaccinate and fortunately our pharmacists were there to meet the challenge. On some of those days, I actually administered more then 100 flu shots daily, in addition to our regular prescription duties. What I noticed more then anything else was not need for additional pharmacist support but for additional technician support to interact, direct and guide our patients. What allowed me to get through those days was that my technicians were performing technician duties and I was only performing pharmacist duties.

Medication Therapy Management is something that clearly improves patient care. To interact with patients on one-on-one basis to go over medications and to document interactions with our patients and prescribers can only be beneficial for our profession. However, at the retail outlets, we struggle to perform MTM services for our patients. The primary reason for lack of success has to do with our resistance to change (ie documenting our interactions) and lack of trained technician support. If you look at MTM process, most of the duties including documentation, contacting patients, billing can all be performed by a trained technician. Pharmacists would only need to perform the clinical aspects that they were trained to deliver. But as of right now, we do not have MTM trained technician who can assist the pharmacist to make this program a success. With the expansion of the technician: pharmacist ratio, I feel like we can get that trained technician to further MTM and our profession.

Changes in our roles, profession, and business that we are facing requires us to change. I believe we must adjust roles and policies to keep up with the progress and provide the services and patient care that public expects and needs from our pharmacists. As a retail pharmacist, I look to providing preventive healthcare measures like health testings, immunizations, and MTM, not because it's services that chains offer to improve business but because these are voids in our healthcare system and our pharmacist can be a solution to those needs.

Ms. Dodson, as a pharmacist, I have a good idea about how many technicians I can safely supervise to assist me in offering these services. Also keep in mind that these needs change depending upon the time of the day or what services we are offering at a particular time. But I would like to be able to make that decision based on what would provide the best patient care and not be limited because of ratio that we have established in the past. Also if you look at other healthcare professions, I don't believe there is a limit set on how many support staff a clinician can have. If you look at the physicians, they don't answer calls or get involved in applying discount coupons, they focus on their trained, professional duties. I believe this is what we need for our profession to continue to grow, that is, we staff based on need for optimal patient care and have the pharmacists focused on their trained duties and have the technicians focus on their duties which should all contribute to enhanced patient care and safety.

I sincerely thank you for listening to a one pharmacist's concern regarding our future.

David S. Lee pharm.D

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