



June 22, 2015

Gay Dodson, RPh
Executive Director
Texas State Board of Pharmacy
William P. Hobby Building
Tower 3, Suite 600
333 Guadalupe Street
Austin, TX 78701

RE: Request to Expand the Definition of a Healthcare Professional Preceptor

Dear Mrs. Dodson:

Request:

This is a request from the Texas Consortium of Experiential Programs (TCEP) to the Texas State Board of Pharmacy (TSBP) to expand the definition of a healthcare professional preceptor. Currently the Board rules define a healthcare professional preceptor as an individual licensed as (A) a physician in Texas or another state; or (B) a pharmacist in a state other than Texas but not licensed in Texas. A healthcare professional preceptor is "an instructor for a Texas college/school-based internship program who is recognized by a Texas college/school of pharmacy to supervise and be responsible for the activities and functions of a student-intern or intern-trainee in the internship program" (TAC 283.2 (12)-(13)).

We propose the definition be expanded to include other health professions in accordance with both the TSBP definition of "practitioner" and new Accreditation Council for Pharmacy Education (ACPE) definition of a "prescriber". The Texas Pharmacy Act, Section 551.003(34)(A) states that a "practitioner" is "*a person licensed or registered to prescribe, distribute, administer, or dispense a prescription drug or device in the course of professional practice in this state; including but not limited to a physician, dentist, podiatrist, or veterinarian*".



In Standard 11.e of the new ACPE Standards 2016, it states that students should participate in experiential educational activities with prescribers/student prescribers and other student/professional healthcare team members”. In the ACPE 2016 Guidelines document (11.E) it further defines prescribers to include “physicians, dentists, nurse practitioners, physician assistants, veterinarians, and their respective students. Based on these definitions we propose the following language change to Board rule 283.2(12) (wording change is highlighted)

A health care professional preceptor is an individual licensed as:

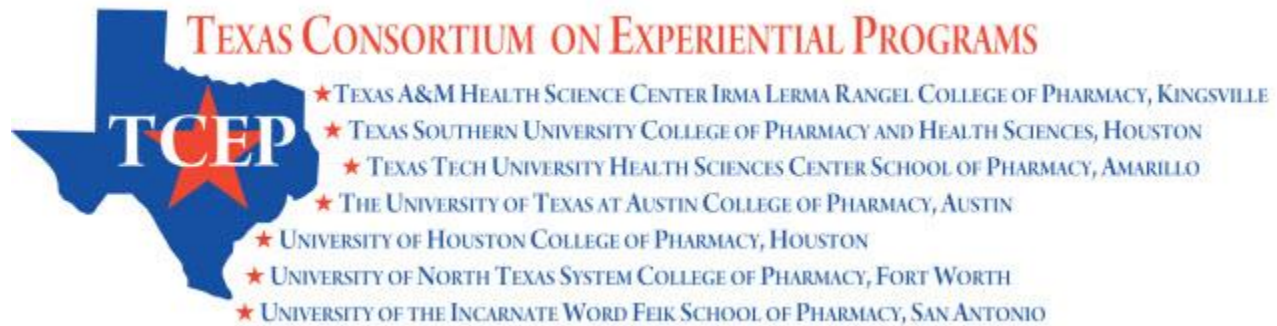
(a) a physician, dentist, podiatrist, veterinarian, nurse practitioner, or physician assistant licensed in Texas or another state

(b) a pharmacist in a state other than Texas but not licensed in Texas

Rationale:

The TCEP recognizes that our pharmacy students are currently able to participate in a number of experiential opportunities with other healthcare professions; however, they are unable to receive internship credit hours for these experiences under the current TSBP definition of preceptor. In addition, with the advent of Interprofessional Education (IPE) as an accreditation standard by ACPE (Standard 11) this change would assist colleges/schools of pharmacy in meeting these requirements. Standard 11 requires that students are “able to provide entry-level, patient-centered care in a variety of practice settings as a contributing member of an interprofessional team”. It also states that colleges/schools should be “providing opportunities for students to learn about, from, and with other members of the interprofessional healthcare team and gain an understanding of the abilities, competencies, and scope of practice of team members; including face-to-face interactions that are designed to advance interprofessional team effectiveness.

Therefore TCEP is requesting the TSBP to expand the current definition of Health Professional Preceptor (as described above) to encourage more interprofessional collaboration and supervision of practice experiences.



The TCEP recognizes and agrees that a student should obtain most of their intern hours under the supervision of a pharmacist, and that colleges/schools would only utilize this definition for a small percentage of a student's rotations. The current Board rule 283.4(c)(3)(B) states "No more than 600 hours of the required 1,500 hours may be obtained under a healthcare professional preceptor except when a pharmacist-intern is working in a federal government pharmacy". In the ACPE Standards 2016 (20.1) it states "The majority of preceptors for any given student are U.S. licensed pharmacists." These definitions limit the use of healthcare professional preceptors, yet with the proposed wording change would allow for some flexibility in the provision of interprofessional education opportunities for students.

Thank you for your consideration of this important proposal. Please direct any questions you have to Flora Estes (Texas Southern University) as our TCEP representative.

Sincerely,

TCEP

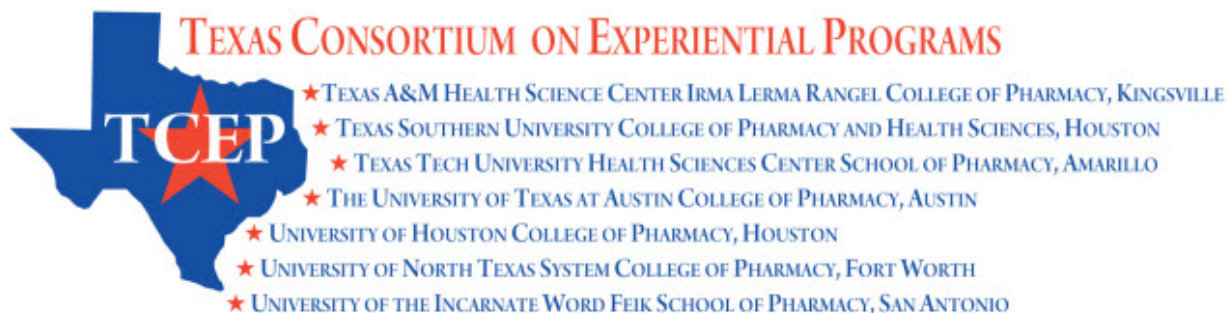
References:

Texas State Board of Pharmacy. Texas Administrative Code. 283.4(c) (3) (B). (Texas colleges/schools of pharmacy internship programs).

Texas State Board of Pharmacy. Texas Pharmacy Act, Section 551.003(34) (A) (Definitions).

Accreditation Council for Pharmacy Education (ACPE). **Accreditation Standards** and Key Elements for the Professional Program in Pharmacy Leading to the Doctor of Pharmacy Degree ("Standards 2016"). Released February 2, 2015.

Accreditation Council for Pharmacy Education (ACPE). **Guidance** to the 2016 Standards and Key Elements for the Professional Program in Pharmacy Leading to the Doctor of Pharmacy Degree. Released February 2, 2015.



July 20, 2015

Gay Dodson, RPh
Executive Director
Texas State Board of Pharmacy
William P. Hobby Building
Tower 3, Suite 600
333 Guadalupe Street
Austin, TX 78701

RE: Request to Remove Specific Duties of Intern-Trainee

Dear Ms. Dodson:

Request:

This is a request from the Texas Consortium of Experiential Programs (TCEP) to the Texas State Board of Pharmacy to remove the listing of duties for intern-trainees items 1-12 under part b in Texas Administrative Code Title 22 Part 15 Chapter 283 Rule 283.5. This would allow for a pharmacy intern-trainee to practice a broad range of skills and apply knowledge learned during the first year of the curriculum at a pharmacy practice site under the **direct supervision** of a pharmacist preceptor in conjunction with

a Texas college/school-based internship program. This change would not allow for an intern-trainee to perform intern duties for employment purposes in the first year of the curriculum. In addition, we propose the following revision to item 283.5 b. (below):

(b) A pharmacist preceptor serving as an instructor for a Texas college/school-based internship program, may delegate intern duties to an intern-trainee assigned to site by a Texas college/school of pharmacy board approved program provided the intern-trainee is under the direct supervision of the pharmacist preceptor.

Rationale:

The Consortium recognizes that pharmacy students are able to participate in a number of experiential opportunities in years 2 to 4 of the program after becoming an intern. However, there are certain pharmacist duties students learn in the first year that they should be given the opportunity to practice in various pharmacy settings. These opportunities should be under the **direct supervision** of a preceptor pharmacist who has been trained and assigned by the Texas college/school internship program. Potential skills taught in the first year of the didactic curriculum include patient medication history interviewing, patient medication counseling, administering immunizations, compounding non-sterile preparations, processing prescriptions and providing information on self-care or over-the-counter products.

For the Texas colleges/schools of pharmacy, experiences completed by an intern-trainee fall under the Accreditation Council for Pharmacy Education (ACPE) category entitled Introductory Pharmacy Practice Experiences (IPPE). This modification to the Rules would allow Texas college/school of pharmacy to expand IPPE beyond shadowing a pharmacist and performing duties of a pharmacy technician during their

first year of the curriculum. Removing the specific duties currently outlined in the Texas Administrative Code would allow alignment with the Accreditation Council of Pharmaceutical Education (ACPE) Accreditation Standards 2016 specifically standard 12.5 that states that “IPPE are structured and sequenced to intentionally develop in students a clear understanding of what constitutes exemplary practice” and standard 12.2 that pertains to the “development and maturation of the knowledge, skills, abilities, attitudes and behaviors that underpin the Education Outcomes articulated in Standards 1-4.” It is also aligned with the ACPE Accreditation Guidance for Standards 2016 guidance 12.d that states “initiate IPPE early in the professional curriculum and to link IPPE-based learning to learning that has taken or is taking place in the didactic curriculum to facilitate the development of knowledge application and clinical reasoning skills.” This modification would allow for Texas college/school of pharmacies to develop focused experiences in skill areas such as patient counseling and interviewing to help students to be more capable of performing these skills on future IPPEs and APPEs. Please be assured that the intern-trainee will only be allowed to perform these assigned duties under **direct supervision** of a pharmacist preceptor in conjunction with a course at a college/school of pharmacy.

Please note that this request has unanimous support of the programs within TCEP and that it was supported by the Deans of Pharmacy in attendance at the May 2015 Texas Pharmacy Congress meeting in Dallas, TX. Thank you for your consideration of this important proposal. Please direct any questions to Lisa Killam-Worrall (University of North Texas System College of Pharmacy at lisa.killam-worrall@unthsc.edu or 817-735-2084) as our TCEP representative.

Sincerely,

TCEP

References:

Texas State Board of Pharmacy. Texas Administrative Code.

Accreditation Council for Pharmacy Education (ACPE). *Accreditation Standards and Key Elements for the Professional Program in Pharmacy Leading to the Doctor of Pharmacy Degree* ("Standards 2016"). Released February 2, 2015.

Accreditation Council for Pharmacy Education (ACPE). *Guidance to the 2016 Standards and Key Elements for the Professional Program in Pharmacy Leading to the Doctor of Pharmacy Degree*. Released February 2, 2015.

TITLE 22 EXAMINING BOARDS
PART 15 TEXAS STATE BOARD OF PHARMACY
CHAPTER 283 LICENSING REQUIREMENTS FOR PHARMACISTS

§283.5 Pharmacist-Intern Duties

(a) A student-intern or an extended-intern participating in a board-approved internship program may perform any duty of a pharmacist provided the duties are delegated by and under the supervision of:

(1) a pharmacist licensed by the board and approved as a preceptor by the board; or

(2) a pharmacist licensed in a state other than Texas when working in a federal facility and serving as an instructor for a Texas college-based internship program.

(b) A pharmacist preceptor serving as an instructor for a Texas college/school-based internship program, may delegate the following duties to an intern-trainee working in a site assigned by a Texas college/school of pharmacy board approved program provided the intern-trainee is under the direct supervision of the pharmacist preceptor:

(1) initiating and receiving refill authorization requests;

(2) entering prescription data into a data processing system;

(3) taking a stock bottle from the shelf for a prescription;

(4) preparing and packaging prescription drug orders (i.e., counting tablets/capsules, measuring liquids, and placing them in the prescription container);

(5) affixing prescription labels and auxiliary labels to the prescription container;

(6) reconstituting medication;

(7) prepackaging and labeling prepackaged drugs;

(8) loading bulk unlabeled drugs into an automated dispensing system provided a pharmacist verifies that the system is properly loaded prior to use;

(9) bulk compounding;

(10) compounding non-sterile preparations provided the intern-trainee has completed the training required for pharmacists in §291.131 of this title (relating to Pharmacist Compounding Non-sterile Preparations);

(11) compounding sterile preparations provided the intern-trainee has completed the training required for pharmacists in §291.133 of this title (relating to Pharmacies Compounding Sterile Preparations); and

(12) administering immunizations provided the intern-trainee has completed the training required for pharmacists in §295.15 of this title (relating to Administration of Immunizations or Vaccinations by a Pharmacist under Written Protocol of a Physician).

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53 (c) When not under the supervision of a pharmacist preceptor, a student-intern or an extended-
54 intern may function as a pharmacy technician and perform all of the duties of a pharmacy
55 technician without registering as a pharmacy technician provided the pharmacist-intern:

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57 (1) is registered with the board as a pharmacist-intern;

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59 (2) is under the direct supervision of a pharmacist;

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61 (3) has completed the pharmacy's on-site technician training program;

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63 (4) has completed the training required for pharmacists in §291.133 of this title (relating to
64 Pharmacies Compounding Sterile Preparations); and

65
66 (5) is not counted as a pharmacy technician in the ratio of pharmacists to pharmacy
67 technicians. The ratio of pharmacists to pharmacist-interns shall be 1:1 when performing
68 pharmacy technician duties.

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70 (d) A pharmacist-intern may not:

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72 (1) present or identify himself/herself as a pharmacist;

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74 (2) sign or initial any document which is required to be signed or initialed by a pharmacist
75 unless a preceptor cosigns the document; or

76
77 (3) independently supervise pharmacy technicians or pharmacy technician trainees.