

TASK FORCE ON PHARMACY TECHNICIAN QUALIFICATIONS AND DUTIES REPORT

Presented to the Texas State Board of Pharmacy
February 7, 2017

INTRODUCTION

The Task Force was established by the Texas State Board of Pharmacy to:

- (1) review the current laws and rules relating to pharmacy technicians in Texas;
- (2) review literature and studies regarding the changing roles and duties of pharmacists and how these changes may impact the role of pharmacy technicians; and
- (3) make recommendations to the Board for any changes to the current pharmacy technician laws and rules to allow pharmacy technicians to assist pharmacists in providing safe and quality pharmaceutical care to the citizens of Texas.

The Task Force met on November 7, 2016. Another meeting will be scheduled after the Pharmacy Technician Stakeholder Consensus Conference to be held February 14-16, 2017, as necessary to review recommendations made at the Consensus Conference.

RECOMMENDATIONS

1. The Board should continue requiring pharmacy technicians to take and pass a national certification examination as approved by the Board.
2. The Board should allow a pharmacy technician trainee to renew their registration once so that the total time as a technician trainee will be 4 years rather than the current 2 years.
3. The Board should review the duties allowed to be performed by a pharmacy technician by redefining the duties involving professional judgment, i.e., those that must be performed by a pharmacist.
 - (A) Duties that require professional judgment include (but are not limited to):
 - making clinical decisions;
 - patient counseling, including patient counseling for over-the-counter (OTC) and herbal products;
 - drug utilization review;
 - product selection, including selection of OTC and herbal products; and
 - medication therapy management
 - (B) Rules should be amended to expand the duties of pharmacy technicians to include:
 - transferring prescriptions by fax or electronic means;
 - performing a final check on a refilled prescription in a Class A pharmacy or on subsequent fills in a Class C pharmacy provided that an accuracy checking

program is used similar to the program allowed by the Idaho Board of Pharmacy (Note: DUR by a pharmacist will still be required);

- data entering prescriptions in a pharmacy or in an area other than the pharmacy (e.g., from home) provided the pharmacy technician is directly supervised by a pharmacist by physical or electronic means; and
 - clarifying certain missing elements on a prescription with the prescriber's office (e.g., dates, strength, quantity, patient information).
4. The Board should establish guidelines for training programs that the pharmacy technician must complete prior to performing expanded duties. A technician may perform expanded duties provided the:
 - technician completes on-the-job training, as provided by Board rules, or an ASHP/ACPE or other Board approved training program(s);
 - training is documented by the pharmacist-in-charge; and
 - pharmacist on duty allows the technician to perform the expanded duties while that pharmacist is working.
 5. The Board should "grandfather" and not require currently registered pharmacy technicians to complete an American Society of Health-System Pharmacists accredited pharmacy technician education program after 2020 when the Pharmacy Technician Certification Board (PTCB) will require completion of such a program prior to taking the PTCB certification exam.
 6. The Board should amend the rules to clarify that pharmacy technicians/trainees are responsible for their actions when performing pharmacy technician duties.
 7. The profession should seek legislation to expand the ability of pharmacy technicians to verify the accuracy of work performed by another pharmacy technicians (i.e. Tech-Check-Tech) in hospital pharmacies and allowing for such in community pharmacies for duties including:
 - stocking medication carts;
 - checking the prepacking of drugs; and
 - stocking automated dispensing systems.
 8. The Board should consider increasing the ratio of pharmacists to pharmacy technicians in certain settings (e.g., long term care pharmacies).
 9. The profession should seek legislation to allow pharmacy technicians to perform certain duties without direct (i.e., physical or electronic) supervision.

TASK FORCE MEMBERS

Chair

Jeanne D. Waggener, R.Ph.

Members

Mark Comfort
Lisa McCartney
Doug Read
Jeff Wagner
Leon Jacobs
Mark Newberry

Danny Vela
Ben Sims
Julie Spier
Ronald Sampere
Steve Williamson

Board Member Liaison

Brad Miller

TSBP Staff

Gay Dodson, R.Ph.
Executive Director/Secretary

Kerstin Arnold
General Counsel

Allison Vordenbaumen Benz, R.Ph., M.S.
Director of Professional Services

Allison Benz

From: Lyndsey McDonald
Sent: Tuesday, January 03, 2017 4:56 PM
To: Allison Benz
Cc: Jeanne Waggener; Bradley Miller
Subject: RE: task force report

Hello Allison,

Thank you for the opportunity to provide feedback on the Technician Task Force draft report. While I was only observing from the audience I have a couple of suggestions for the final version for your consideration.

Items 4 and 5 under "Recommendations", from my point of view, were items that the task force discussed but never actually appeared to reach a consensus on. Particularly with item 4 regarding training guidelines, the task force discussed what type of training may be required for technicians to practice expanded duties and used ASHP accredited training as an example, but the entire task force did not appear to be in agreement on requiring ASHP accredited training. Similarly, item 5 reads as if all pharmacy technicians will be required to complete an ASHP accredited program, however if they Board decides to accept multiple certifications exams, that will not necessarily be mandated. Is it possible to include items 4 and 5 in a section titled "other discussion topics" as opposed to "recommendations" in order to educate the board about the discussion, but not infer consensus on the topic from the task force?

Item 1 could be clarified, due to the Board's recent vote to consider multiple certification exams through an RFQ process. The current wording reads as if the Task Force recommends only one exam still. Suggestion: "The Board should continue requiring pharmacy technicians to take and pass nationally certified examinations approved by the Board"

Thank you again for the opportunity to provide feedback and for your consideration of our comments.

Lyndsey McDonald
Strategic Partnerships | ExCPT

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NATIONAL HEALTHCAREER ASSOCIATION
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September 26, 2016

Gay Dodson
Executive Director
Texas State Board of Pharmacy
333 Guadalupe St., Suite 3-600
Austin, TX 78701-3943

Email: gay.dodson@pharmacy.texas.gov

Dear Ms. Dodson:

On behalf of the National Association of Chain Drug Stores (NACDS) members operating 3,200 pharmacies across the state of Texas, we ask that the Texas State Board of Pharmacy (“TSBP”) to approve the ExCPT exam for use in Texas as an additional alternative to the Pharmacy Technician Certification Board (PTCB) exam. We believe that ExCPT will provide pharmacy technicians with an economical and equally effective alternative for demonstrating their qualifications to work as certified pharmacy technicians as we have seen in 31 other states.

Texas law enacted in 2001 gave the Texas State Board of Pharmacy (TSBP) authority to approve options for pharmacy technician certification examinations.¹ Through rulemaking that took effect in 2003, TSBP established that pharmacy technicians must pass either the “Pharmacy Technician Certification Board’s National Pharmacy Technician Certification Examination or other examination *approved by the board* [emphasis added].”²

For more than 13 years, TSBP has opted not to exercise the flexibility afforded to it under the laws and rules, instead continuing to recognize only the Pharmacy Technician Certification Board’s (PTCB) certification exam. Consequently, pharmacy technicians in the state of Texas have but one option to meet the existing certification exam requirement, despite the availability and prevalence of alternative certification exam options, including the National Healthcare Association’s Certified Pharmacy Technician (CPhT) certification program which is recognized in at least 31 other states. In fact, only 5 other states require PTCB certification to work as a pharmacy technician. The remaining states do not require certification at all.

The ExCPT exam originally was developed by the Institute for Certification of Pharmacy Technicians (ICPT)³ to evaluate the knowledge and skills associated with the performance of tasks required for professional practice as a pharmacy technician. The ExCPT exam has been shown to be psychometrically sound and applicable to general pharmacy practice settings including hospital pharmacies and retail pharmacies. Like the PTCB exam, ExCPT has maintained accreditation from the National Commission for Certifying Agencies (NCCA) since 2008. This accreditation ensures

¹ Texas Occupations Code § 568.001 (a)(1)(B)

² 22 TAC § 297.3 (c)(1)(B)

³ ICPT has since been incorporated into the National Healthcareer Association (NHA), a division of Assessment Technologies Institute (ATI).

that the program adheres to the industry's current standards of practice. In February 2007, the National Association of Boards of Pharmacy (NABP) recognized "the importance of certification programs being measured against NCCA's objective, third party standards that are widely adopted and highly regarded in the certification industry."⁴

NACDS members believe that it is in the best interest of pharmacy technicians in the state of Texas to be provided with exam options that work best for them in their individual practice settings. Pharmacy technicians are valuable members of the pharmacy team and are deserving of such. We urge TSBP to seriously consider our request to approve an alternative pathway for pharmacy technicians to meet certification examination requirements.

Sincerely,

A handwritten signature in black ink that reads "May Staples". The signature is written in a cursive, flowing style.

Director, State Government Affairs
NACDS

⁴ PTCB Press Release, February 22, 2007

From: Sharon Ottinger
Sent: Wednesday, September 07, 2016 7:13 AM
Subject: ExCPT EXAM

Dear Board Members of the Texas Board of Pharmacy:

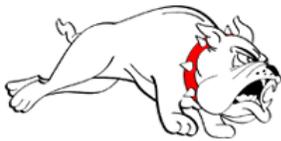
I urge you to add the ExCPT exam as the certifying exam at the next board meeting on November 1, 2016.

It is of utmost importance for the pharmacy students to sit for the national exam prior to graduation. Many of our students are counting on this as their career path and due to their financial situation, may only be able to pursue this as their option.

With heartfelt appreciation for all you do, please continue to represent the best interest of our students by adding the ExCPT exam as the certifying exam.

Sincerely,

Sharon Ottinger,
Counselor



"GO BULLDOGS!"

Hitchcock High School
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Hitchcock, TX 77563

PHONE: 409.316.6544
FAX: 409.986.9339

"What lies behind us, and what lies before us, are tiny matters compared to what lies within us." Ralph Waldo Emerson

September 13, 2016

Texas State Board of Pharmacy
333 Guadalupe Ste. #3 – 600
Austin, TX 78701

Re: Addition of ExCPT exam as a certifying exam

Dear TSBP Board Member:

We are High School Health Science teachers. We have just become aware of a possible survival strategy for our Pharmacy Technician students. If you, the Texas State Board of Pharmacy board members, would consider allowing our students to sit for the ExCPT exam as an option to the PTCB exam --- we believe that our high school program could continue to serve our community and our state. As your next scheduled board meeting is November 1, 2016, we will all have to work diligently.

We are located in a small isolated county which will suffer greatly from the 2020 requirements as per the PTCB. I am quite certain that you are aware of this; however, we are enclosing a flyer of "Why they will not work for Texas".

We thank you for your timely consideration concerning this matter.

Sincerely,

Sara Storck, Health Info Mgmt

Jenney Green Karasek, RDH

Loriann Vasquez, RN

PTCB requirements for 2020:

Why they will not work for Texas

- I. ASHP REQUIREMENTS FOR SCHOOLS**
 - A. Advisory Committee**
 - 1. Pharmacist
 - 2. Faculty
 - 3. Pharmacy Technicians
 - B. Program Director**
 - 1. Must be a licensed pharmacist or a nationally certified pharmacy technician with at least five years of experience working in a pharmacy prior to entering this position.
 - 2. Must demonstrate on-going continuing education in the field of pharmacy and/or education.
 - 3. If the program director is a pharmacy technician – the director is required to have graduated from an ASHP accredited pharmacy technician program and must possess or be actively pursuing an Associate Degree or an appropriate state teaching credential at a minimum.
 - 4. Must be a member of a national pharmacy or education association *and* a state pharmacy association. Must ensure that memberships in pharmacy and education associations are represented among the program faculty members.
 - C. Faculty/Instructors**
 - 1. Must have a minimum of three years of experience working in a pharmacy
 - D. Experiential Coordinators**
 - 1. Must have a minimum of three years of experience working in a pharmacy
 - E. 600 clock hour Program – extending over fifteen weeks or longer**
 - 1. Didactic – 160 hours
 - 1. Curriculum that does not require a separate simulated or experiential setting. It must progress from more basic to more complex information, concepts, and skills.
 - 2. Simulated – 80 hours
 - 1. Practical skills without impact on real patients
 - 2. Must be done before experiential hours
 - 3. Must include sufficient equipment and supplies to realistically simulate an actual work environment
 - 3. Experiential – 160 hours
 - a. Must be performed in at least two different sites
 - b. One of which must be a dispensing pharmacy
 - 4. Remaining – 200 hours
 - a. Can be allocated to the three above areas as the program director and faculty sees fit.
 - F. Accreditation Fee Schedule for School/College or Hospital/Health System-Based Pharmacy Technician Training Program**

- G.** Year 2021: the 28 Colleges and Vocational schools would graduate 840 students, a shortfall of 14,160 Certified Pharmacy Technicians (CPhTs)
- H.** Year 2022: another 14,160 short; at that rate, a 50% shortage of Certified Pharmacy Technicians (CPhTs) in 2 years
- I.** Shortfall does not include Bureau of Labor Statistics of a 20% growth by 2022.

III. Concerns facing Texas Pharmacies

- A.** Texas has 254 counties with the 28 schools located in 15 counties. (See attached map)
 - 1. Pharmacies in smaller counties have a problem recruiting pharmacists, how will they recruit technicians?
 - 2. Harris County has 9 schools, Dallas and Tarrant have total of 5
- B.** Chain stores with American Society of Health System Pharmacists (ASHP) programs will become training grounds for all.
 - 1. Debbie Mack, R.Ph. and Tim Koch at the August 4, 2015 TSBP meeting expressed concern that Texas does not have an adequate number of training programs and facilities with preceptors to accommodate the high volume of new pharmacy technicians licensed each year.
 - 2. Tim Koch with Wal-Mart at the May 3, 2016 TSBP meeting stated that it would cost about \$8,000 to train a Pharmacy Technician.
 - 3. Mary Staples with NACDS at the August 2, 2016 BOP meeting requested that the BOP recognize all certifying test accredited by NCCA (National Commission for Certifying Agencies)
- C.** House Bill 5 (HB 5), passed by the Texas Legislature in 2013
This bill put career and technical education (CTE) back in High schools.
 - 1. Prepares youth for a wide range of high-demand careers
 - 2. High schools with health career pathways leading to national certification as a CPhT cannot afford the high cost of meeting ASHP guidelines. These programs will disappear.
- D.** We will need 500 schools in Texas meeting ASHP guidelines each paying ASHP \$500 for the application and \$2,400 annual assessment fee.
 - 1. ASHP would receive \$250,000 for applications
 - 2. And \$1,200,000 annual assessment fee.
 - 3. All schools would need to have Experiential training (160 hours) that must be performed in at least two different job sites.

IV. Other states' requirements

- A.** 31 states approve both the ExCPT and PTCE (includes Washington D.C.)
- B.** 11 states do not require certification at all (no approval process) – Alaska, Arkansas, Florida, Hawaii, Maine, Missouri, New Hampshire, New York, Oklahoma, Wisconsin
- C.** 9 states recognize the PTCE ONLY
 - 1. 5 of these 9 require certification for all technicians – Arizona, Louisiana, North Dakota, Texas, Wyoming
 - 2. 3 of these 9 require certification only to increase tech to pharmacist ratio's – South Carolina, North Carolina, Colorado

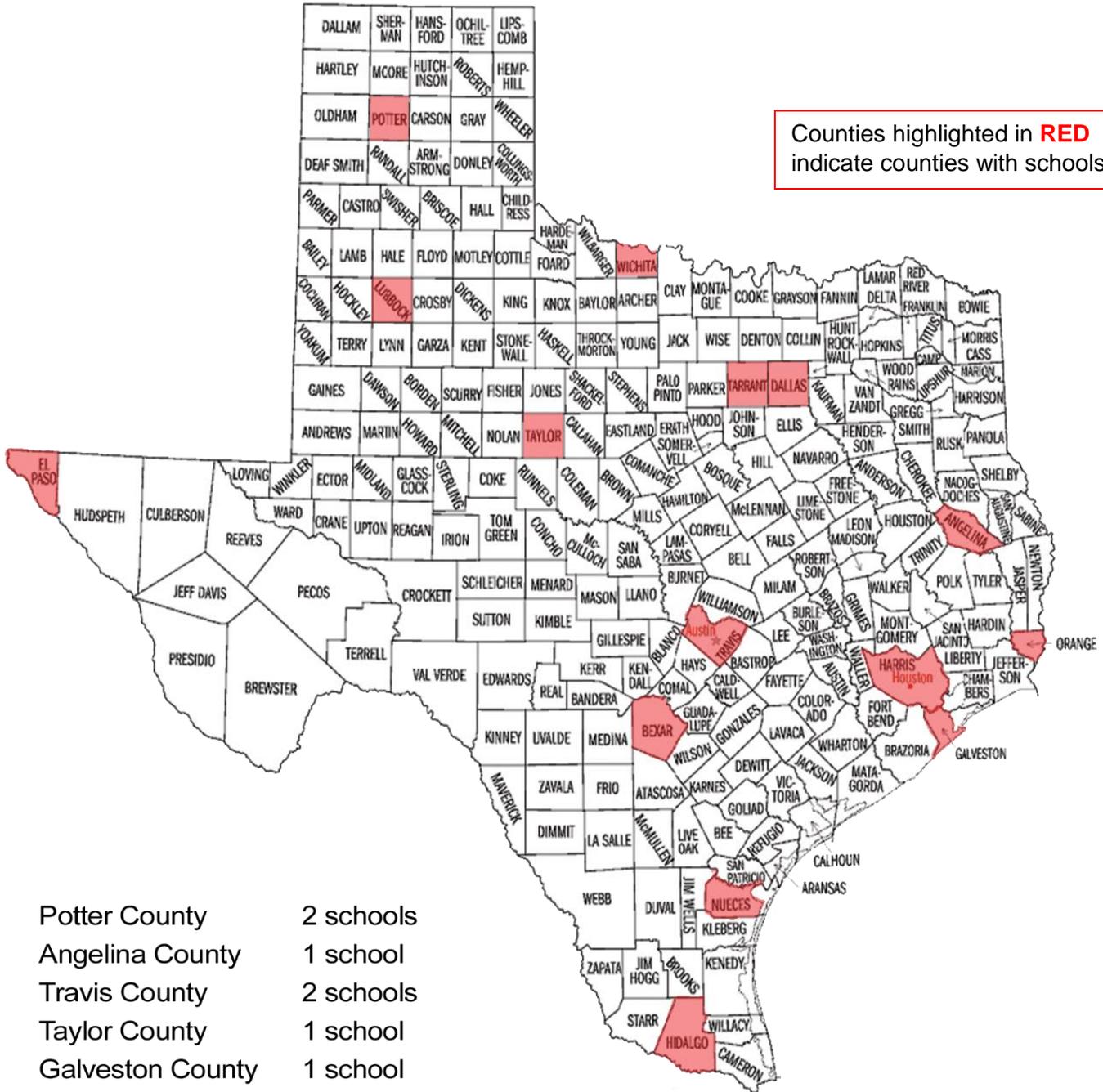
3. 1 of these gives candidates a choice between approved training or PTCB certification - California

V. Solution

- A.** Texas State Board of Pharmacy should recognize both the Exam for Certification of Pharmacy Technicians (ExCPT) given by NHA (National Healthcareer Association) and the Pharmacy Technician Certification Exam (PTCE) given by the PTCB (Pharmacy Technician Certification Board)
 1. Both the Pharmacy Technician Certification Exam (PTCE) and Exam for Certification of Pharmacy Technicians (ExCPT) are *ACCREDITED* by the NCCA (National Commission for Certifying Agencies)
 2. Passing of either test earns the designation of a nationally Certified Pharmacy Technician (CPhT)
 3. Home or employee based training allows local pharmacies to draw from their communities
- B.** Texas State Board of Pharmacy had the exams evaluated by two 3rd party evaluator:
 1. NHA (ExCPT) average 93%
 2. PTCB (PTCE) average 96%
- C.** 85th Texas legislative sessions
 1. NACDS and independent pharmacies will take this issue to their legislators.
 2. Change in statute
 - a. Require the Board of Pharmacy to recognize all pharmacy technician certifications offered by an entity accredited by the National Commission for Certifying Agencies (NCCA)
 - b. Reasoning: This recommendation would require that all accredited pharmacy technician certification programs be recognized in Texas, which will ensure that Texas is able to meet the ongoing demand for qualified pharmacy technicians.

Thank you,
David L. Dubose, R.Ph.
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Orange, Texas 77630
admin@passassured.com
Office 409-883-4041

Counties highlighted in **RED** indicate counties with schools.



Potter County	2 schools
Angelina County	1 school
Travis County	2 schools
Taylor County	1 school
Galveston County	1 school
Nueces County	1 school
El Paso County	1 school
Harris County	9 schools
Orange County	1 school
Bexar County	1 school
Dallas County	3 schools
Tarrant County	2 schools
Hidalgo County	1 school
Wichita County	1 school
Lubbock County	1 school

**There are 254 counties in Texas.
15 Counties have ASHP Schools**