

June 5, 2019

Ms. Caroline Juran, Executive Director
Virginia Board of Pharmacy

Via email: caroline.juran@dhp.virginia.gov

Re: 2020 Legislative Proposal - Amendment to Code of Virginia Section 54.1-3321, Requirements for Pharmacy Technicians

On behalf of our members operating 1171 pharmacies in the state, the National Association of Chain Drug Stores (NACDS) and the Virginia Association of Chain Drug Stores (VACDS) appreciate the opportunity to comment on the Virginia Board of Pharmacy's (Board) proposed legislative amendment to Code of Virginia Section 54.1-3321, regarding new requirements for pharmacy technicians. While we are highly supportive of properly training pharmacy technicians, we continue to be concerned about the impact the proposed amendment would have on the technician workforce and pharmacy operations in the state.

During the public comment period at the last regulation committee meeting, multiple individuals voiced their support for a policy allowing board-approved employer-based training to continue to be a viable option, as well as their parallel concern that the draft legislation only allowed for ASHP/ACPE accredited training programs. It appears the board may have perceived that adding in "or other Board-approved accrediting body with substantially similar standards" would address these concerns. However, this additional verbiage does not resolve the issue because the options for accreditation beyond ASHP/ACPE are extremely limited. Amending the legislation to include board-approved employer-based training would address these concerns.

We recognize that the Board's intent is to standardize technician training and certification by removing employer-based training that isn't nationally accredited as an option. National accreditation is not only cost-prohibitive for the employer, the standard requirements beyond basic competency standards will force both technicians and employers to train and provide training far and above what is necessary to work in their practice setting.

Furthermore, we don't believe there is any evidence that mandating national accreditation for these training programs will improve patient care in Virginia. Currently, there are at least 65 employer-based programs operating that have been approved by the Board. Eliminating access to those programs that aren't accredited will leave a critical gap in accessible and affordable employer-based training for would-be technicians, forcing them into expensive tuition-based training. Prior to making such an impactful move, we would respectfully request whether the board has any data that demonstrates that the programs they have approved are not up to par.

Additionally, there is already a shortage of technicians in Virginia. These burdensome requirements for technicians to complete an accredited training program in addition to passing a national certification test (no matter in what capacity they will be practicing) will only add to that shortage. In turn, patient care and pharmacy workflow would be significantly affected. We would also note that the draft legislation does not include grandfathering provisions for current technicians and technicians-in-training.

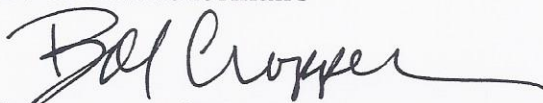
Unfortunately, NACDS and VACDS members will oppose this legislation if introduced as currently written. There is no evidence to support that requiring accredited training programs in addition to national certifications yield better trained technicians. Instead, we would urge the Board to advocate for legislation to study this question.

We thank the Board for the opportunity to comment on this important issue and look forward to working with you to ensure that pharmacy technicians continue to be properly trained for the tasks they are assigned. Please do not hesitate to contact me with any questions or concerns.

Sincerely,



Jill McCormack, Director
State Government Affairs



Bill Cropper, Rph, President
Virginia Association of Chain Drug Stores