



July 31, 2019

Allison Benz  
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By Fax: 512-305-8082

By Email: [general\\_info@pharmacy.texas.gov](mailto:general_info@pharmacy.texas.gov)

**RE: Texas Board Discussion on Expanding Technician Duties – D.6 – TAB 36**

Dear Ms. Benz:

On behalf of our 22 member companies operating more than 2800 retail pharmacies in Texas, the National Association of Chain Drug Stores (NACDS) wants to provide Board members with our initial recommendations on expanding the role of pharmacy technicians to help enhance public safety and access health care services.

Given the growing demand for pharmacist-provided patient care services in community pharmacies, there is a corresponding need to deploy pharmacy technicians for administrative and non-judgmental duties. Furthermore, elimination of technician to pharmacist ratios will enable pharmacists to focus more on counseling patients, performing MTM, providing disease management programs, engaging in other important patient care services, and collaborating with other health care professionals, thus integrating more fully in a patient's care. These services also help patients better adhere to their medication regimens and ultimately serve to improve patients' health and wellness and reduce our nation's health care costs.

While your current rules specify tasks pharmacy technicians may perform, the non-judgmental duties are limited. NACDS strongly supports pharmacists practicing at the top of their profession to allow for optimal patient care and improved health outcomes. When considering an enhanced role for pharmacy technicians in collaborative health settings, several duties can be reasonably delegated from these two categories: (1) medication dispensing support; and (2) technical support for clinical services provided by pharmacists and other health professionals. We recommend that the Board strongly considers adopting changes that would allow pharmacy technician to perform the following duties:

## **1. Medication Dispensing:**

Some pharmacist duties related to medication dispensing can be delegated to pharmacy technicians, thus allowing pharmacists to devote more time to patient care. The following tasks are related to medication dispensing and can be performed by a technician:

- **Accepting a verbal prescription:** Allows the technician to accept a verbal prescription by phone. Currently, 16 states permit this activity for certified technicians.<sup>1</sup>
- **Transferring a prescription:** Allows the technician to transfer a patient's prescription to another pharmacy. Currently, 13 states permit this activity for certified technicians.<sup>2</sup>
- **Contacting a prescriber for clarifications:** When information on a prescription is incomplete, a pharmacy technician can contact the prescriber and appropriately obtain the needed information. However, if the inquiry regarding the missing information requires the professional judgment of a pharmacist, then the pharmacist would contact the prescriber. Currently, six states permit this activity for certified technicians.<sup>3</sup>

## **2. Assisting with Clinical Services:**

The following are potential tasks that may be delegated to a technician with proper training to augment the role of pharmacists in providing direct patient care services. It is important to note that these tasks would not allow technicians to perform clinical services, but to perform steps that are part of a clinical service that do not require professional judgment. Except for Idaho, which now allows technicians to administer vaccines, these tasks are not expressly allowed in any state. However, it has been suggested that pharmacy technicians can be trained to perform the following:

- **Administer vaccines:** Prescribers routinely delegate vaccine administration to healthcare paraprofessionals. Similarly, there is an opportunity to allow pharmacists to delegate this task to a properly trained and certified pharmacy technician. In Idaho, technicians who are appropriately trained and certified may administer vaccines.<sup>4</sup>

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<sup>1</sup> Currently allowed in ID, IL, IA, LA, MA, MI, MO, NH, NC, ND, OH, PR, RI, SC, TN, and WI. National Association of Boards of Pharmacy; *Survey of Pharmacy Law*; 2018; pp. 50.

<sup>2</sup> Currently allowed in AZ, ID, LA, MA, MI, MO, NC, ND, PR, RI, SC, TN, and WY. *Id.* at 51.

<sup>3</sup> Currently allowed in DE, IL, ID, IA, MI and SD.

<sup>4</sup> Rules of the Idaho State Board of Pharmacy, 27.01.01.330.02(b)(3)

## Conclusion

We thank the Board for the opportunity to provide input in advance of the discussion at the upcoming meeting on August 6<sup>th</sup>. We look forward to working with you to ensure that patients in Texas continue to receive optimal healthcare at their community pharmacy. If you have any questions or need additional information, please contact me at [mstaples@nacds.org](mailto:mstaples@nacds.org) or 817-442-1155.

Sincerely,

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

Mary Staples  
Regional Director, State Government Affairs