



NATIONAL ASSOCIATION OF
CHAIN DRUG STORES

July 24, 2018

Megan G. Holloway
Assistant General Counsel
Texas State Board of Pharmacy
333 Guadalupe Street, Suite 3-500
Austin, Texas, 78701

Via email: megan.holloway@pharmacy.texas.gov

Re: Proposed Rule Changes Under 22 TAC 291.32 (Personnel) and 22 TAC 291.33 (Operational Standards)

Dear Ms. Holloway,

On behalf of our members operating chain pharmacies in the state of Texas, the National Association of Chain Drug Stores (NACDS) is writing to convey our support for the proposed rule changes under 22 TAC 291.32 and 22 TAC 291.33 that will allow pharmacy technicians and pharmacy technician trainees to load prepackaged containers previously verified by a pharmacist or manufacturer's unit of use packages into an automated dispensing system. We appreciate the Texas State Board of Pharmacy (TSBP) considering our comments on this rulemaking.

Ongoing reforms in the healthcare system offer pharmacists additional opportunities to utilize their expertise and play an expanded role in patient care in collaboration with other health care providers. While pharmacists are generally underutilized in the delivery of patient care services, community pharmacists have been recognized as an untapped resource in recent years. More and more, pharmacists are performing increasingly important roles in the care of patients by providing convenient, accessible, and cost-effective healthcare services such as health and wellness testing, preventive screenings, managing chronic disease, medication therapy management (MTM) services, administering immunizations and long acting injectable medications, and otherwise working in partnership with healthcare entities and other providers to improve health outcomes

Considering the growing demand for pharmacist-provided patient care services in community pharmacies, there is a corresponding need to utilize pharmacy technicians and pharmacy technician trainees for administrative and non-judgmental duties. Given that the proposed rule changes under 22 TAC 291.32 and 22 TAC 291.33 facilitate this, we commend the Board for pursuing this rulemaking.

NACDS thanks TSBP for considering our comments on this matter. Please do not hesitate to contact me with any questions or for further assistance. I can be reached at: 817-442-1155 or mstaples@nacds.org.

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

NACDS Regional Office

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