

September 21, 2021

Kamlesh Gandhi
Executive Director
Arizona State Board of Pharmacy
1616 W. Adams St., Ste. 120
Phoenix, AZ 85007

Via email: kgandhi@azpharmacy.gov

**RE: Pharmacist-administered or Intern-administered Immunizations (R4-23-211)
and Pharmacy Technicians and Pharmacy Technician Trainees (R4-23-1104)
Proposed Rules**

Dear Mr. Gandhi:

On behalf of our members operating community pharmacies in Arizona, the National Association of Chain Drug Stores (NACDS)ⁱ is writing to communicate our strong support for the proposed rules allowing pharmacists to delegate additional nondiscretionary tasks to pharmacy technicians, including the technical act of administering vaccines and performing other tasks that a pharmacy technician is trained to perform. This rule change will serve to empower pharmacists to optimize use of the pharmacy technician workforce as they work to meet increasing public demand for pharmacy services.

As amplified during the COVID-19 pandemic, pharmacies play a vital role delivering healthcare services to the public. More and more, people have come to rely on their local pharmacy for necessary care access, including for vaccines, testing services, health screenings, and other important clinical care. Meeting patient demand for these clinical services while simultaneously meeting prescription dispensing needs for patients is greatly enhanced by the ability of each member of the pharmacy team to contribute at the top of their skills and to deploy care models that remove inefficiencies. Leveraging pharmacy technicians to assist in administering vaccines serves this importance purpose, bolstering pharmacies' ability to meet patients' various healthcare needs.

Throughout the public health emergency, pharmacy technicians have been integral in the delivery of vaccine services. As authorized by the federal government under the Public Readiness and Emergency Preparedness Act (PREP Act), trained pharmacy technicians throughout the state are already participating in the administration of vaccines to the people of Arizona. By permanently codifying the ability of pharmacy technicians to continue to assist pharmacists with vaccine administration efforts, the regulatory change

proposed by these rules will help to ensure that pharmacies can continue to provide the level of patient care services that the general public has come to expect in recent times.

NACDS thanks you for consideration of our comments. We ask the Board to adopt these proposed rules to optimize the capacity of the pharmacy community to pharmacies to meet patients growing pharmacy care needs. If you have any questions or need additional information, please contact Sandra Guckian, NACDS' Vice President, State Relations, at sguckian@nacds.org or 703-774-4801.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven C. Anderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steven C. Anderson, FASAE, CAE, IOM
President and Chief Executive Officer

ⁱ The National Association of Chain Drug Stores represents traditional drug stores, supermarkets and mass merchants with pharmacies. Chains operate over 40,000 pharmacies, and NACDS' over 80 chain member companies include regional chains, with a minimum of four stores, and national companies. Chains employ nearly 3 million individuals, including 155,000 pharmacists. They fill over 3 billion prescriptions yearly, and help patients use medicines correctly and safely, while offering innovative services that improve patient health and health care affordability. Please visit nacds.org.