



May 19, 2023

Kamlesh "Kam" Gandhi
Executive Director
Arizona State Board of Pharmacy
1110 W. Washington St., Suite 260
Phoenix, AZ 85007

Submitted via email to kqandhi@azpharmacy.gov

Re: Proposed Rule Changes to R4-23-1104; Pharmacy Technicians and Pharmacy Technician Trainees

Dear Dr. Gandhi,

On behalf of our members operating chain pharmacies throughout the state, the National Association of Chain Drug Stores (NACDS) thanks the Arizona State Board of Pharmacy (Board) for the opportunity to comment on the proposed rule changes to R4-23-1104 that would permanently authorize pharmacy technicians to administer vaccines under the delegation and supervision of a pharmacist. As the Board aptly recognizes in the preambles of both the proposed rule and in the corresponding emergency rule posted on the Board website, the federal PREP Act allowances for pharmacy technicians to administer vaccines amplified pharmacies' capacity to deliver vaccine services to the American public. Maintaining these authorities for pharmacy technicians will help support pharmacies' ability to meet increasing public demand for vaccine services and pharmacy care into the future.

NACDS agrees with the Board's rationale and arguments for pursuing this rulemaking. Indeed, leveraging pharmacies – one of the most accessible health destinations for the public – has helped to increase vaccination rates and improve access to care. With the contributions of the full pharmacy team that includes pharmacy technicians, pharmacy providers have provided more than 303 million COVID-19 vaccines to date.¹ Pharmacies have been especially effective at connecting patients who are otherwise disproportionately impacted by inequitable access to healthcare services to needed vaccine services. In fact, more than 40% of individuals vaccinated at pharmacies were from racial and ethnic minority groups.² Leveraging pharmacy technicians to participate in the technical act of vaccine administration has been integral to these efforts. Notably, an internal survey of NACDS members conducted in March 2022 found that up to 38% of all COVID-19 vaccine doses provided by pharmacies were administered by pharmacy technicians.³

The vital role that pharmacies play in delivering healthcare services to the public is increasingly evident. Cemented by the experience of the COVID-19 pandemic, more and more people rely on their local pharmacy for necessary care access, including for vaccines, testing services, health screenings, and other important clinical care. By permanently codifying the ability of pharmacy technicians to continue to assist pharmacists with vaccine administration efforts, this rulemaking will help to ensure that pharmacies can continue to provide the level of patient care services that the public now expects at their neighborhood pharmacy.

¹ <https://www.cdc.gov/vaccines/covid-19/retail-pharmacy-program/index.html>

² GAO, Federal Efforts to Provide Vaccines to Racial and Ethnic Groups, available at <https://www.gao.gov/assets/gao-22-105079.pdf>

³ NACDS conducted a survey of their chain pharmacy membership via an established workgroup in late March 2022. The workgroup is comprised of more than 60 individuals representing about 30 chain pharmacy organizations. The purpose of the survey was to begin estimating pharmacies' impact in responding to the COVID-19 pandemic in topic areas where data was not readily available. The survey response rate was 40%.

For the reasons outlined in these comments, NACDS strongly supports the proposed changes to R4-23-1104 and urges the Board to act expeditiously to finalize this rulemaking. We thank the Board for the opportunity to share our perspectives on this important matter. If you have any questions or need additional information, please contact NACDS' Vice President, State Pharmacy and Advocacy Sandra Guckian at SGuckian@nacds.org or 703-837-4195.

Sincerely,



Steven C. Anderson, FASAE, CAE, IOM
President and Chief Executive Officer
National Association of Chain Drug Stores

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NACDS represents traditional drug stores, supermarkets and mass merchants with pharmacies. Chains operate nearly 40,000 pharmacies, and NACDS' 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 healthcare affordability. NACDS members also include more than 900 supplier partners and over 70 international members representing 21 countries. Please visit NACDS.org.