Report of the Task Force on Standardized Pharmacy Technician Education and Training

NOTE: The NABP Executive Committee accepted all the recommendations of this task force with the following exceptions:

- Recommendation 3 was made more specific to assert that NABP will encourage states that certify technicians to recognize certification by the Pharmacy Technician Certification Board (PTCB). The basis for this decision by the Executive Committee is that PTCB certification and, specifically, the Pharmacy Technician Certification Examination have been reviewed and approved by NABP pursuant to Resolution 96-1-2000, adopted by the member boards of NABP at the 96th Annual Meeting in 2000.

- Recommendation 5 was accepted in part and rejected in part. Rejected was the Task Force's recommendation to incorporate the term Certified Pharmacy Technician Trainee into the Model State Pharmacy Act and Model Rules of the National Associations of Boards of Pharmacy. Although the Executive Committee agreed to the concept, they felt a more appropriate, less-confusing term would be Candidate for Certified Pharmacy Technician.

Members Present:
Susan Ksiazek (NY), chair; Wendy L. Anderson (CO); Lee Ann Bundrick (SC); Gay Dodson (TX); Jacqueline L. Hall (LA); Jeane A. Johnson (NM).

Members Not Present:
Jerry Wiesenhahn (OH)

Others Present:
Gregory Braylock, Sr, executive committee liaison; Carmen A. Catizone, Melissa Madigan, Eileen Lewalski, Christine Siwik, Gertrude Levine, NABP staff.

Guest Participants:
Douglas Scheckelhoff, American Society of Health System Pharmacists; Melissa Murer Corrigan, Pharmacy Technician Certification Board; Jan Keresztes, Pharmacy Technician Educators Council, Kevin Nicholson, National Association of Chain Drug Stores.

Introduction:
The Task Force on Standardized Pharmacy Technician Education and Training met September 9-10, 2008 at NABP Headquarters.
This task force was established in response to Resolution 104-4-08, Task Force on Standardized Pharmacy Technician Education and Training, which was approved by the NABP membership at the Association’s 104th Annual Meeting in May 2008.

**Review of the Task Force Charge**

Task force members reviewed their charge and accepted it as follows:

1. Review and analyze the present state requirements for pharmacy technician licensure, registration, and certification.
2. Review and analyze the present state requirements for pharmacy technician education and/or training.
3. Assess the feasibility, in regard to the protection of the public health, of the states implementing standardized state requirements for technician education and/or training.
4. Recommend revisions, if necessary, to the *Model State Pharmacy Act and Model Rules of the National Association of Boards of Pharmacy (Model Act)* addressing this issue.

**Recommendation 1: NABP Clarify the Terms Used for Pharmacy Technicians**

The task force recommends that NABP clarify for the states the meanings of the words *licensure, registration,* and *certification* as they relate to the regulation of pharmacy technicians in order to promote standardized use of these terms among the states.

**Background:**

Task force members discussed the status of pharmacy technician regulation among the states, particularly the fact that the words *licensure, registration,* and *certification* are often used interchangeably for essentially the same designation of pharmacy personnel. Members concluded that in order for pharmacy technician education and training to be standardized there should be a consensus among the states in the nomenclature. Members agreed that states should strive to mirror the *Model Act* for uniformity by recognizing two tiers of non-pharmacist personnel: pharmacy technicians and certified pharmacy technicians.

**Recommendation 2: NABP Continue to Support the Recommendation that States License or Register Pharmacy Technicians**

The task force recommends that NABP continue to support its position that states should license or register pharmacy technicians in the interest of the public health and improved patient care and safety, and to address the growing problem of diversion by unlicensed pharmacy personnel.

**Background:**

Task force members agreed that a crucial step towards standardization would be for all states to license or register pharmacy technicians. Upon obtaining and reviewing compiled data, members recognized that pharmacy technicians were one of the few ancillary personnel in the health care field that remained unlicensed in several states. Members noted that pharmacy technician-attributable medication errors have increasingly gained national media attention and voiced...
concern that this has shed a negative light on the regulation of pharmacy practice, particularly in states lacking licensure or registration of pharmacy technicians.

Members also discussed the role that licensure and registration play in decreasing diversion of controlled substances. Several task force members relayed their states’ increases in diversion-based disciplinary actions subsequent to the establishment of pharmacy technician licensure or registration requirements. They indicated that such requirements effectively precluded violators from obtaining employment in other pharmacies through license or registration revocation. Members also discussed the importance of applicant criminal background checks and how they keep potential diverters from obtaining access to pharmacies. Members felt that states should proactively conduct criminal background checks and not rely on the veracity of applicants to disclose past criminal convictions.

Recommendation 3: NABP Encourage States to Require Pharmacy Technician Certification from an Organization that Utilizes a Nationally Recognized Competency Assessment Examination

The task force recommends that states, subsequent to implementing a pharmacy technician registration or licensure system, require technicians to obtain certification from an organization that utilizes a nationally recognized competency assessment examination as a means to provide further assurances that pharmacy technicians possess necessary knowledge and skills to assist in the practice of pharmacy.

Background:

Task force members discussed information provided by the guest participants and concluded that certification would be a progressive step only if competency was measured. It was agreed that, to provide the most accurate measure of competence, any examination used had to be developed using nationally recognized and validated psychometric and pharmacy practice standards. It was acknowledged that NABP directly verified the standards and processes of the Pharmacy Technician Certification Board (PTCB) examination for certification and that NABP’s Model Act recommends that boards of pharmacy utilize that certification program as part of their assessment of pharmacy technician competency.

Recommendation 4: NABP Encourage States to Continue to Report Pharmacy Technician Disciplinary Information to the NABP Disciplinary Clearinghouse and Expand the NABP Licensure Transfer Program to Include Pharmacy Technicians

The task force recommends that NABP encourage states to continue to report pharmacy technician disciplinary information to the NABP Disciplinary Clearinghouse. The task force further recommends that NABP expand its licensure transfer program to include pharmacy technicians who have been certified by a pharmacy technician certification program that utilizes a nationally recognized competency assessment examination.

Background:

Task force members discussed the importance of board of pharmacy reporting of pharmacy technician disciplinary information to the NABP Disciplinary Clearinghouse, especially in light of the prevalence of diversion cases. Members stressed that disciplinary reporting will make it more difficult for disciplined individuals to relocate to another state and obtain pharmacy employment.
Members also discussed how the expansion of NABP’s licensure transfer program to include pharmacy technicians and the utilization of a certification process would positively impact the pharmacy profession by guaranteeing a national pool of pharmacy technicians that have achieved a level of competency and professionalism. Members agreed that pharmacy technicians must be certified in order to participate in the NABP licensure transfer program.

**Recommendation 5: Amend Model Act**

The task force recommends the following changes to the *Model Act*, including changes to the Model Rules for the Practice of Pharmacy. The revisions recommended by the task force are denoted by underlines and strikethroughs.

**Model State Pharmacy Act and Model Rules of the National Association of Boards of Pharmacy**

**Article I Title, Purpose, and Definitions**

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**Section 105. Definitions.**

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(r) “Certified Pharmacy Technician“ means personnel registered with the Board who have completed a certification program approved by the Board and may, under the supervision of a Pharmacist, perform certain activities involved in the Practice of Pharmacy, such as receiving new Prescription Drug Orders; prescription transfer; and Compounding but excluding Drug Regimen Review; clinical conflict resolution; prescriber contact concerning Prescription Drug Order clarification or therapy modification; Patient Counseling; and Dispensing process validation.

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(ddddd) “Pharmacy Technician” means personnel registered with the Board who may, under the supervision of the pharmacist, assist in the pharmacy and perform such functions as assisting in the Dispensing process; processing of medical coverage claims; stocking of medications; cashiering but excluding Drug Regimen Review; clinical conflict resolution; prescriber contact concerning Prescription Drug Order clarification or therapy modification; Patient Counseling; Dispensing process validation; prescription transfer; and receipt of new Prescription Drug Orders.

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**Section 105(dddd). Comment.**

The term Pharmacy Technician will continue to be utilized until 2015. At that time, the *Model State Pharmacy Act and Model Rules* will be amended to require that all Pharmacy Technicians be certified. The *Model Act* will also be amended at that time to replace the term Pharmacy Technician with the term Certified Pharmacy Technician Trainee, which will be redefined to provide a path to certification for non-certified pharmacy technicians. A one-time renewal of the Certified Pharmacy Technician Trainee registration will be allowed.
Article III

Licensing

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Section 308. Registration of Certified Pharmacy Technicians.
(a) In order to be registered as a Certified Pharmacy Technician in this State, an applicant shall:
(1) have submitted a written application in the form prescribed by the Board of Pharmacy;
(2) have attained the age of ______;
(3) have good moral character;
(4) have graduated from high school or obtained a Certificate of General Educational Development (GED) or equivalent;
(5) have:
   (i) graduated from a competency-based pharmacy technician education and training program approved by the Board of Pharmacy; or
   (ii) been documented by the Pharmacist-in-Charge of the Pharmacy where the applicant is employed as having successfully completed a site-specific, competency-based education and training program approved by the Board of Pharmacy and having successfully completed an objective assessment mechanism prepared in accordance with any rules established by the Board;
(6) have successfully passed an examination developed using nationally recognized and validated psychometric and pharmacy practice standards or examinations approved by the Board of Pharmacy; and
(7) have paid the fees specified by the Board of Pharmacy for the examination and any related materials, and have paid for the issuance of the registration.
(b) No Pharmacist whose license has been denied, Revoked, Suspended, or restricted for disciplinary purposes shall be eligible to be registered as a Certified Pharmacy Technician.
(c) The Board of Pharmacy shall, by rule, establish requirements for registration of Certified Pharmacy Technicians.

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Section 309. Registration of Pharmacy Technicians.
(a) In order to be registered as a Pharmacy Technician in this State, an applicant shall:
(1) have submitted a written application in the form prescribed by the Board of Pharmacy;
(2) have attained the age of ______;
(3) have good moral character;
(4) have paid the fees specified by the Board; and
(5) have been documented by the Pharmacist-in-Charge of the Pharmacy where the applicant is employed as having successfully completed a site-specific training program and having successfully completed an objective assessment mechanism prepared in accordance with any rules established by the Board.
(b) No Pharmacist whose license has been denied, Revoked, Suspended, or restricted for disciplinary purposes shall be eligible to be registered as a Pharmacy Technician.
(c) The Board of Pharmacy shall, by rule, establish requirements for registration of Pharmacy Technicians.

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**Section 308(a)(5)(i). Comment.**
It is recommended that states adopt this requirement, if not currently required, through a process that incorporates provisions for grandfathering.

**Section 308(a)(5 and 6). Comment.**
In 2015, the *Model State Pharmacy Act and Model Rules* will be amended to require persons seeking to become Certified Pharmacy Technicians to complete each of the requirements outlined in Sections 308(a)(5)(i), 308(a)(5)(ii), and 308(a)(6).

**Section 309. Comment.**
In 2015, the *Model State Pharmacy Act and Model Rules* will be amended to remove the term Pharmacy Technician and incorporate the term Certified Pharmacy Technician Trainee, which will be redefined to provide a path to certification for non-certified pharmacy technicians. A one-time renewal of the Certified Pharmacy Technician Trainee will be allowed.

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**Model Rules for the Practice of Pharmacy**

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**Section 2. Personnel.**

(a) Duties and Responsibilities of the Pharmacist-in-Charge

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(2) The Pharmacist-in-Charge has the following responsibilities:

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(B) a Pharmacy Technician Training Manual for the that is site-specific to the practice setting of which he or she is in charge. He or she shall supervise a site-specific training program conducted pursuant to the Pharmacy Technician Training Manual for all individuals employed by the Pharmacy who will assist in the Practice of Pharmacy. The Pharmacist-in-Charge shall be responsible for maintaining a record of all Certified Pharmacy Technicians and Pharmacy Technicians successfully completing the Pharmacy’s Technician site-specific training program and an objective assessment mechanism. The Pharmacist-in-Charge shall attest to the Board of Pharmacy, in a timely manner, those persons who, from time to time, have met the training requirements necessary for registration with the Board;
Background:
Members reviewed the *Model Act* and the Model Rules for the Practice of Pharmacy and concluded:

1. the terms Pharmacy Technician and Certified Pharmacy Technician should continue to be utilized until 2015 and at such time NABP should modify the *Model Act* to require that all Pharmacy Technicians be certified. Also at that time, the term Pharmacy Technician should be replaced with the term Certified Pharmacy Technician Trainee and redefined to provide a path by which all pharmacy technicians can become certified. A one-time renewal of the Certified Pharmacy Technician Trainee registration will be allowed;

2. requirements for certification should include a high school diploma, a Certificate of General Educational Development, or equivalent, and should incorporate provisions for grandfathering;

3. requirements for certification should include board-approved, competency-based training and educational programs; and

4. the term “site-specific” should be added to pharmacy technician and certified pharmacy technician training program references.

Members also discussed whether the boards of pharmacy should recognize specific accrediting bodies, such as the American Society of Health-System Pharmacists (ASHP) in their regulations regarding board-approved, competency-based training and educational programs. Members concluded that ASHP or other accrediting bodies need not be mandated but certainly could be provided for by policy.

**Recommendation 6: NABP Develop an Interactive Educational Session at the 105th Annual Meeting**

The task force recommends that NABP develop an interactive educational session at the 105th Annual Meeting that addresses the issues related to the standardization of pharmacy technician education and training.

**Background:**
Members suggested that NABP conduct an open discussion at the 105th Annual Meeting. Further discussion ensued regarding the logistics of such an event and it was determined that an interactive continuing education session would be most appropriate for the boards of pharmacy as well as meeting participants.

**Recommendation 7: Request a Second Meeting of the Task Force and/or Create a Standing Committee**

The task force requests that the Executive Committee approve funding for a second meeting of the task force and/or create a standing committee on pharmacy technicians to review existing state requirements for educational and training programs and national accrediting organizations’
core competencies to recommend a national standard for the educational and training requirements for pharmacy technician certification.

**Background:**

Members agreed that standardization of pharmacy technician education and training has been, and will continue to be, an ongoing issue and, as such, should be addressed on a regular basis until at least such time that all states license or register pharmacy technicians and that a national license transfer program is operational.