

Report of the Overview Task Force on Requirements for Pharmacy Technician Education, Practice Responsibilities, and Competence Assessment

Members Present:

Lemrey "Al" Carter (IL), *chair*; Gary Dewhirst (CO); Cindy Fain (AR); John Genovese (NH); Jackie Hall (LA); Jason Hansel (IA); Timothy "Tim" Koch (AR); Gary Merchant (NH); Kristen Snair (AZ); Donna Wall (IN); Anita Young (MA).

Others Present:

Bradley S. Hamilton, *Executive Committee liaison*; Eric Brichto, Accrediting Bureau of Health Education Schools (ABHES); Ryan Burke, Pharmacy Technician Certification Board (PTCB); Jeremy Sasser, National Healthcareer Association; William Schimmel, PTCB; Janet Silvester, American Society of Health-System Pharmacists (ASHP), *guests*; Carmen Catizone; Melissa Madigan; Eileen Lewalski; Maureen Schanck; and Romy Schafer, *NABP staff*.

Introduction:

The task force met on September 11-12, 2019, at NABP Headquarters in Mount Prospect, IL. This task force was established pursuant to Resolution 115-4-19, Task Force on Requirements for Technician Education, Practice Responsibilities, and Competence Assessment, which was approved by the NABP membership at the Association's 115th Annual Meeting in May 2019.

Review of the Task Force Charge:

The charge of the task force will be to:

1. evaluate the current environment for the regulation of pharmacy technicians; and
2. make recommendations for the task force subgroups to focus on ensuring boards of pharmacy take a more active role in establishing requirements for the education, practice responsibilities, and competence assessment of pharmacy technicians.

Background and Discussion:

Members of this task force were charged with reviewing and making general recommendations on various aspects of pharmacy technician education, practice responsibilities, and competence assessment, which will be assessed separately in upcoming task forces dedicated to each of the three topics.

The task force members began their discussion with a review of the charge and request by NABP membership to consider the evolving role of pharmacy technicians and recommend how to ensure that pharmacy technicians are equipped to meet the increasing responsibilities related to their positions, while being mindful of what is in the best interest of public safety and the protection of public health.

The task force members reviewed previous NABP task force reports related to the role of pharmacy technicians and their expanding scope of practice over time. The earliest NABP task force recommendations centered on such topics as the recognition of certified pharmacy technicians and their advanced roles, as well as the requirement for pharmacy technicians to have documented site-specific training. In more recent years, NABP task forces have recommended that all pharmacy technicians become certified, and that pharmacy technician education providers be accredited by a nationally recognized accrediting body to ensure quality technician education.

The task force members emphasized the importance of pharmacy technicians to patient care and recognized that pharmacy technicians are often the primary contact for patients in community pharmacies. The task force also noted that pharmacists are delegating more and more non-clinical tasks to pharmacy technicians so that pharmacists can provide more patient-centered care and advanced clinical services.

In order to fulfill the task force charge, members of the task force felt that the first question to consider was “what should technicians be able to do as an expanded scope and support the pharmacist’s increased patient care scope of practice?” Members noted that some boards of pharmacy are moving away from prescriptive rules outlining what their licensees can do. They agreed that if minimum entry-level educational and competence standards are met, pharmacy technicians should not be prohibited from performing duties within a defined scope in which they have demonstrated competence, considering, of course, the best interest of patients.

On the issue of uniform laws and rules, members also discussed the fact that, although the scope of practice for pharmacists is, for the most part uniform among states, that is not the case for pharmacy technicians. In addition, the requirements for pharmacy technician education and licensure or registration vary significantly. Members grappled with the need for stricter uniform requirements for entry-level pharmacy technicians; for example, the requirement to obtain a background check. The task force engaged in a lively discussion about whether stricter requirements for pharmacy technician licensure would benefit patient safety.

Several members suggested that basic educational requirements and the needed level of competence should be further defined, and the use of a uniform entry-level exam be considered. Members noted that if such an exam was required by all states, then pharmacists and boards could feel confident that pharmacy technicians have the fundamental skills to provide support and ensure patient safety. In addition, members recognized that such uniformity could ensure a level of competence to justify the use of a licensure transfer system similar to that in place for pharmacists.

As part of the discussion about an entry-level licensure exam, members discussed the Pharmacy Technician Certification Examination (PTCE) and the Exam for the Certification of Pharmacy Technicians (ExCPT). Members questioned what these exams assess and at what point certification should occur. Should certification be required before licensure or by a specified time period after licensure? Should it only be required for technicians performing more advanced roles? Some members expressed concern that a new entry-level exam would be redundant to the certification exams. Also of concern was the fact that some states, like Iowa, are currently experiencing a pharmacy technician shortage due to a number of factors related to requirements for entry and career sustaining issues.

The task force pondered the training needed to be eligible to sit for an exam, and if it is important to standardize such training. Task force members discussed whether state boards of pharmacy are equipped to handle the accreditation of pharmacy technician education providers or if that should be left to a third party. If left to a third party, the boards of pharmacy can then define competencies and education standards, perhaps deferring to accrediting organizations' approval processes and defining of pharmacy technician responsibilities supported by the knowledge and skills required to effectively carry out those responsibilities. Overall, members agreed that regulators should be the ones to decide minimum training requirements for all settings, as well as continuing education requirements. In addition, members discussed how boards can support continuing education learning opportunities.

To put the discussions into context, members learned about a new, more advanced level pharmacy technician in New Hampshire – the licensed advanced pharmacy technician. These licensees can independently perform product verification, process refills, and verify the repackaging of drugs. They perform under the supervision of a pharmacist but are held accountable to the board of pharmacy as a mid-level practitioner. Another example mentioned of advanced technician practice was that of military-trained pharmacy technicians. It was noted that they have more advanced responsibilities than their civilian counterparts. Members agreed that these examples should be evaluated further when considering future roles for pharmacy technicians.

The task force noted that any additional burdensome regulatory requirements for pharmacy technician candidates should coincide with an expanded scope of practice, which would allow technicians to broadly utilize their advanced skills. The task force members stressed that the state boards of pharmacy will need to keep in mind their mission to protect public safety while still providing pharmacy technician candidates with a pathway that will enhance future pharmacy care services and meet the needs of patients.

After careful review and deliberation, the task force recommended the following:

1. The NABP Task Force on Requirements for Pharmacy Technician Education and the Task Force on Pharmacy Technician Competence Assessment should consider establishing minimum standards for pharmacy technician licensure.
2. The NABP Task Force on Pharmacy Technician Competence Assessment should research and evaluate the feasibility of requiring a pharmacy technician entry-level exam for licensure.
3. The NABP Task Force on Pharmacy Technician Competence Assessment should research and evaluate the requirements for minimum standards for an entry-level licensure exam (perform a gap analysis, including state law) and determine if PTCE and ExCPT meet those requirements.
4. The NABP Task Force on Requirements for Pharmacy Technician Education should perform a gap analysis of accreditation standards of accrediting organizations, including those of the ASHP/Accreditation Council for Pharmacy Education (ACPE) and ABHES.

5. The NABP Task Force on Requirements for Pharmacy Technician Education should evaluate and recommend standards for entry-level pharmacy technician education and training programs based on the results of the gap analysis.
6. The NABP Task Force on Requirements for Pharmacy Technician Education and the NABP Task Force on Pharmacy Technician Competence Assessment should recommend revisions, if necessary, to *The Model State Pharmacy Act and Model Rules of the National Association of Boards of Pharmacy (Model Act)* regarding the definitions and scope of practice of entry-level pharmacy technicians.
7. NABP should convene the Task Force on Requirements for Pharmacy Technician Practice Responsibilities scheduled for 2020 to evaluate the various levels of pharmacy technician practice, including but not limited to, levels identified by the current ASHP/ACPE standards, and recommend revisions, if necessary, to the *Model Act*.