



American Society of
Health-System Pharmacists®

7272 Wisconsin Avenue
Bethesda, Maryland 20814
301-657-3000
Fax: 301-664-8877
www.ashp.org

March 28, 2007

Ms. Elizabeth Scott Russell
Executive Director
Virginia Board of Pharmacy
6603 West Broad Street, 5th Floor
Richmond, VA 23230-1712

Re: ASHP Opposition to the ExCPT Certification Examination

Dear Ms. Russell:

On behalf of the American Society of Health-System Pharmacists and our state affiliate the Virginia Society of Health-System Pharmacists, we wish to express our concern about the potential inclusion of the examination developed by the Institute for the Certification of Pharmacy Technicians (ICPT) known as the Examination for the Certification of Pharmacy Technicians (ExCPT).

ASHP is the 30,000-member national professional association that represents pharmacists who practice in hospitals, health maintenance organizations, ambulatory care clinics, long-term care facilities, home care, and other components of health care systems. Technicians who work in these settings are supervised by pharmacists and help them provide patient care while fulfilling the need to protect the public health. ASHP encourages the wise use of trained pharmacy technicians to increase the pharmacist's involvement in patient care. ASHP, which has a long history of medication-error prevention efforts, believes that the mission of pharmacists is to help people make the best use of medicines. Assisting pharmacists in fulfilling this mission is ASHP's primary objective.

Technician certification exams should be nationally validated, and psychometrically sound

The enclosed ASHP policy (0412) supports "...mandatory certification by the Pharmacy Technician Certification Board (or another comparable nationally validated, psychometrically sound certification program) approved by the state board of pharmacy." Based on our policy, we urge the Board not to approve this examination for registration

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as a pharmacy technician. ASHP encourages the Board to carefully evaluate any certification examination it approves as an alternative to PTCB.

The Board should not approve any certification examination that is not proven to meet all the standards required of a legally defensible, high stakes test. ASHP believes that any acceptable approach to the evaluation of a technician's abilities must include a nationally validated and psychometrically sound certification examination.

The development of the Pharmacy Technician Certification Board (PTCB) and its certification exam represents a significant step in the standardization of requirements for technician practice. ASHP believes the certification exam developed by PTCB meets current standards for a legally defensible, high stakes test that is nationally validated and psychometrically sound (see enclosed NABP memo dated February 15, 2006). ASHP encouraged PTCB to submit its examination to the National Commission for Certifying Agencies (NCCA) for an independent review and accreditation. We are pleased to note that PTCB has obtained accreditation by NCCA¹. NCCA's Standards exceed the requirements set forth by the American Psychological Association and the U.S. Equal Employment Opportunity Commission.

Since ExCPT has suggested that its examination complies with the standards set forth by NCCA and the American Psychological Association, we urge the Board to request that ExCPT submit its examination to NCCA prior to review and approval in Virginia. We believe that the Board should only approve examinations that are NCCA-accredited.

The profession widely accepts PTCB certification

PTCB's certification examination is the only exam widely recognized by the profession. This includes a majority of states, major employers in all settings (hospital, major chains etc.) and recognition by the National Association of State Boards of Pharmacy (NABP). PTCB is governed by ASHP and the NABP, the American Pharmacists Association, the Michigan Pharmacists Association, and the Illinois Council of Health-System Pharmacists. Moreover, among the community pharmacies that utilize the PTCB certification program are CVS, Eckerd, and Walgreens. More than 60,000 technicians employed by community chain pharmacies have successfully passed the PTCB exam.

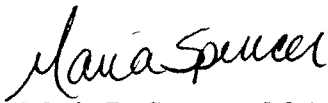
¹ NCCA is the accrediting body for the National Organization for Competency Assurance (NOCA), which is the national leader in setting quality standards for credentialing organizations. They use a peer review process to: establish accreditation standards; evaluate compliance with the standards; recognize organizations/programs which demonstrate compliance; and serve as a resource on quality certification. For more information on NCCA--<http://www.noca.org/ncca/accreditation.htm>

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We hope these comments provide the Board with some additional items to consider regarding ExCPT's examination and certification process. Please consider whether ExCPT's examination and certification process as outlined in ASHP's policy is " ... ***a nationally validated, psychometrically sound certification...***" If ExCPT's certification process does not meet such characteristics, then in the interest of maintaining an appropriate level of competency of the pharmacy technician workforce and to provide for appropriate patient safety and protect the public health, the Board should not approve ExCPT's examination.

If you have any questions or comments please do not hesitate to contact me directly at 301.664.8687 or mspencer@ashp.org.

Sincerely,



Maria D. Spencer, M.A.
Director, State Government Affairs

Enclosures

cc: Robert J. Stoneburner, President, Virginia Society of Health-System Pharmacists
Kelly L. Gill, Executive Director, Virginia Society of Health-System Pharmacists
Rodney L. Stiltner, Chair, Legal and Regulatory Affairs Committee
Virginia Society of Health-System Pharmacists

0412

**UNIFORM STATE LAWS AND REGULATIONS REGARDING PHARMACY
TECHNICIANS**

Source: Council on Legal and Public Affairs

To advocate that pharmacy move toward the following model with respect to technicians as the optimal approach to protecting public health and safety: (1) development and adoption of uniform state laws and regulations regarding pharmacy technicians; (2) mandatory completion of a nationally accredited standardized program of education and training as a prerequisite to pharmacy technician certification; and (3) mandatory certification by the Pharmacy Technician Certification Board (or another comparable nationally validated, psychometrically sound certification program approved by the state board of pharmacy) as a prerequisite to the state board of pharmacy granting the technician permission to engage in the full scope of responsibilities authorized by the state; further,

To advocate registration of pharmacy technicians by state boards of pharmacy; further,

To advocate, with respect to certification, as an interim measure until the optimal model is fully implemented, that individuals be required either (1) to have completed a nationally accredited standardized program of education and training or (2) to have at least one year of full-time equivalent experience as pharmacy technicians before they are eligible to become certified; further,

To advocate that licensed pharmacists be held accountable for the quality of pharmacy services provided and the actions of pharmacy technicians under their charge.

(Note: Certification is the process by which a nongovernmental agency or association grants recognition to an individual who has met certain predetermined qualifications specified by that agency or association. Registration is the process of making a list or being enrolled in an existing list; registration should be used to help safeguard the public through interstate and intrastate tracking of the technician work force and preventing individuals with documented problems from serving as pharmacy technicians.)

This policy supersedes ASHP policy 0322.



National Association of Boards of Pharmacy

1600 Feehanville Drive • Mount Prospect, IL 60056-6014
Tel: 847/391-4406 • Fax: 847/391-4502
Web Site: www.nabp.net

nabp

TO: EXECUTIVE OFFICERS – STATE BOARDS OF PHARMACY
FROM: Mary A. Dickson, Associate Executive Director
DATE: February 15, 2006
RE: Technician Certification Examinations

A number of boards of pharmacy recently contacted NABP requesting information for evaluating proposals for examinations that test pharmacy technicians. The following information details critical standards that must be addressed by any examination program in order for the examination to be valid and defensible.

NABP adheres to these recognized and valid psychometric standards in preparing the licensure and certification examinations (NAPLEX, MPJE, and FPGEE) offered by the Association for use by the states. NABP, through its partnership in the Pharmacy Technician Certification Board (PTCB), can also confirm that valid, psychometric standards are similarly utilized in preparing the Pharmacy Technician Certification Examination (PTCE).

Practice Analysis

Sometimes referred to as a Job or Task Analysis, the *Practice Analysis* is a survey, study, and determination of the profession or occupation to identify the knowledge and skills needed by entry level practitioners at each stage of practice. Conducting a Practice Analysis is the first step of the examination validation process. The Practice Analyses conducted by NABP and PTCB for their examination and certification programs are always national studies that delineate the tasks engaged in by pharmacists and technicians and the criticality of those tasks to the protection of the public health. In reviewing any proposal for an examination, one of the first questions the Board should ask is if a Practice Analysis has been conducted. Follow-up questions would concern the time of the most recent Analysis, methodologies utilized, and final determinations. The Board should also request a copy of the most recent Practice/Job Analysis.

Test Blueprint/Specifications

The test blueprint is a detailed, written plan for a test that typically includes descriptions of the test's purpose and target audience; the content or performance areas it will cover; the number and types of questions to be written for each content or performance area, their scoring, and other characteristics; the test administration method; and desired psychometric characteristics of the items and the test. The test blueprint is also referred to as the test specifications or test plan. Information about the plan is often released to candidates and the public in the form of

competency statements. Test blueprints and competency statements should be developed using psychometrically sound procedures based upon the results of national Practice/Job Analysis studies. In evaluating a proposal before the Board to recognize an examination, information concerning the test blueprint and competency statements should be readily provided and also distributed to candidates upon request. The Board should be able to discern the relationship between the test blueprint and the Practice Analysis.

Item Writing Procedures

Technically sound and recognized testing standards for writing test questions or items should be employed. Item writers should be experts in the practice areas identified by the test specifications. Each item writer should undergo significant training, by item writing experts, as part of the item writing and validation process. The Board should request information about the item writing process, selection and qualification of item writers, and success of the item writing activities.

Exam Items and Questions

Test questions developed through the item writing process should be validated for use through intense content and practice expert review and field testing processes. Information about the item writers and item writing process should be provided as part of the regular reporting. Multiple-choice questions are recommended for licensure and certification examinations. True and false and fill-in-the blank questions are problematic and generally not recommended for use by test development experts. A sufficient item bank of questions is necessary in order for the examination to be robust and avoid overexposure of items. The Board should ask questions about all dimensions of the item pool and how items are field tested and selected for inclusion in examinations.

List of Examination Review Committee Members

The list of examination committee members should be published annually and available upon the board's request. A review of this information should note that the examination review committee members are recognized experts and renowned individuals in their fields of practice and study.

Description of Test Assembly Procedures

Test assembly procedures should follow sound psychometric standards and be regularly reported. An examination cannot be assembled without adhering to psychometric and content parameters. Any certification or licensure examination used by the Board to determine which candidates can practice or not, must demonstrate consistency between administrations, correlate to the passing score and Practice Analysis findings, and discriminate between candidates who perform well and candidates who perform poorly. The Board should ask prospective examination providers about how such objectives are achieved and about the construction of all examinations.

Number of Test Forms Used Per Administration

Some examinations are unique in that there are no test forms. For example, in a computer-adaptive design and administration each candidate is administered a different examination. Each individual candidate's examination is structured during the administration based upon a complex logarithm that uses individual candidate ability, content blueprint areas, and other parameters delineated in the test specifications. Other examinations offer a number of test forms at each administration to reduce the exposure of items and deter candidate cheating. Each test form should meet established testing standards and be assembled according to the test specifications. In order to maintain the number of test forms, robust item pools should be assembled, preferably containing many times the number of questions needed to assemble the desired number of test forms. A large item pool is especially necessary with a computer-administered examination because of the frequency of administration and the resulting need to avoid overexposure of items. The overexposure of items may lead to memorization of items by test takers and invalidation of the examination. The Board should inquire about the number of test forms, item exposure, security procedures for maintaining the examination forms, and all other matters related to the administration of the examination.

Description of Type of Scoring Used (ie, Criterion-referenced)

Psychometrically sound procedures should be followed to score and validate the examination. Certification examination scoring should be based upon a valid, established criterion-referenced passing score, which is established using accepted methods, and reviewed with each administration. The passing score is not determined by a percentage of items answered correctly nor does it relate to normative (bell-curve) performance. Carefully calibrated and monitored item and test specification statistics are used to guarantee that each and every examination administered within a program is of the same mean difficulty (within recommended standard errors of measurement). Another scoring process that is sometimes used is a straight percentage of questions answered correctly for every administration, without equating back to a base examination or previous examination. Under this process, test results from administration to administration or candidate to candidate cannot be compared. In addition, the assessment of a candidate's competence or performance could be completely different from one administration to the next. This method of test scoring is not recommended for high stakes licensure and certification examinations. The Board should receive information about the scoring and how the pass score has been determined. The information should conform to all testing and psychometric standards and be presented in a clear manner.

Rationale for Type of Scoring Used

Documented sound and recognized testing and psychometric standards form the rationale for the scoring used for the examination. Information on this rationale should be readily provided to the Boards and stakeholders upon request.

Item Analyses

The performance of test items should be analyzed according to established psychometric methods. Every newly written item should be field tested or pretested through administration to actual candidates before being including that item in the scored item pool. This process provides statistical data to determine if the new item meets the psychometric and content requirements for inclusion as a scored item, which will be used to determine a candidate's score in future administrations. If an item meets these requirements and is included as a scored item in subsequent administrations, it is constantly monitored for performance, using detailed item statistics, to ensure that it is performing as desired. Wide variations in performance will trigger that the item be reviewed and possibly removed from the scored item pool. Information about this process and adherence to all acceptable testing and psychometric standards should be made available to the Boards.

Reports

Passing Score

Reports should be issued to the Boards and to the public on the passing score and process for determining the passing score.

Technical

Technical reports should be issued periodically, preferably after every administration of the examination. The report should include, at a minimum, operational information about the administration, a description of the test assembly procedures, reliability and validity information, test equating methods, scoring tables and procedures, and statistical summary information.

Score Reports to Examinees and Others

Score reports provided to candidates and the Boards should be developed in conjunction with the boards and meet all testing and psychometric standards. If possible, diagnostic information should be included for failing candidates.

Security Policies and Procedures

Information about the policies and procedures as well as actual copies of the policies and procedures should be provided at various times and available upon request.

Pass/Fail Statistics

The pass/fail statistics should be regularly reported to the Boards.

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Test Provider Bylaws, Organizational Chart, Budget/Revenue Accounting Statements, Annual Reports

The test provider's Bylaws, organizational chart, budget/revenue accounting statements, and annual reports should be readily available upon request.

To promote and protect the public's health, safety, and welfare through the regulation of the practice of pharmacy is the mission of state boards of pharmacy and NABP. The use of psychometrically sound and valid licensure and certification examinations support this mission.

If you have any questions, please contact me via phone at 847/391-4400 or 1-800/774-6227, or via e-mail at mdickson@nabp.net. Thank you.

cc: NABP Executive Committee
Carmen A. Catizone, Executive Director/Secretary