



May 23, 2008

Mr. Steve M. Saxe, Executive Director  
Washington State Board of Pharmacy  
Washington State Department of Health  
310 Israel Road  
PO Box 47863  
Olympia, WA 98504-7863

Dear Mr. Saxe:

On behalf of the American Society of Health-System Pharmacists (ASHP), I am writing to share our comments on proposed rules WAC 246-901-030 and WAC 246-901-060, regarding the education, training, and certification of pharmacy technicians. ASHP is a strong proponent of the establishment of uniform standards for pharmacy technician training and certification, as it aids in the protection of the public health and ensures appropriate service and care for the citizens of Washington state.

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. Pharmacy technicians who work in these settings are supervised by pharmacists and assist the pharmacist in providing patient care. We encourage the appropriate use of trained pharmacy technicians by pharmacists as they work to provide effective and individualized patient care.

Last month, the ASHP Board of Directors approved the enclosed revision to Policy 0412, *Uniform State Laws and Regulations Regarding Pharmacy Technicians*, which will be considered by the House of Delegates on June 8, 2008. It clearly advocates as a prerequisite to state board registration or licensure that “the optimal approach to protecting the public health and safety [includes]:

1. The development and adoption of uniform state laws and regulations regarding pharmacy technicians;
2. The mandatory completion of a ASHP-accredited program of education and training as a prerequisite to pharmacy technician certification; and
3. The mandatory certification by the Pharmacy Technician Certification.”

***We strongly urge the Board of Pharmacy to recognize ASHP's accreditation of pharmacy technician programs in the regulation.***

As WAC 246-901-030 (1)(a) currently reads, the educational requirement must be approved by the board of pharmacy. We would advocate the addition of ASHP accreditation. ASHP's Commission on Credentialing develops standards and reviews the programs for compliance with those standards based on an ongoing task analysis and expert review of content matter. The standards are based on task analysis of pharmacy technicians that practice in a variety of settings. The Commission itself represents the full spectrum of practice settings, with representation from ASHP, the American Pharmacists Association, the American College of Clinical Pharmacy, and the Academy of Managed Care Pharmacy.

We have some concern regarding WAC 246-901-030 (1)(b), which refers to on-the-job training programs that are approved by the board of pharmacy. We appreciate that there are current practitioners who have not enrolled or completed a formal academic technician training program and would not seek to add an undue burden. However, such on-the-job training programs do not and cannot match the academic emphasis that a formal training program provides.

***We strongly urge the Board of Pharmacy to require the successful completion of the PTCB examination for all pharmacy technicians who practice within the state of Washington.***

We applaud the current language in WAC 246-901-030 (3), which states that "applicants must pass a board-approved national standardized pharmacy technician certification examination." We would encourage the Board to take an additional step and specifically mandate completion of the Pharmacy Technician Certification Board (PTCB) exam.

In Washington alone, over 2,305 technicians have been certified by the PTCB. To date, the exam has certified over 300,000 technicians and its Board of Governors includes representatives from the National Association of Boards of Pharmacy, ASHP, the American Pharmacists Association, the Illinois Council of Health-System Pharmacists (ICHSP), PTCB, and the Michigan Pharmacists Association (MPA). The PTCB exam is psychometrically-sound, legally defensible, and applicable to all pharmacy practice settings. The exam is regularly reviewed for its continued applicability in response to challenges in the health care environment.

In its April 24, 2008 memo to all state boards of pharmacy, the National Association of Boards of Pharmacy (NABP) states that they have "not received any information, from any source, concerning the validity or psychometric soundness of any technician examination beyond Pharmacy Technician Certification Board's Pharmacy Technician Certification Examination (PTCE)." A copy of the memo is enclosed. The memo concludes by saying that the promotion and protection of the "public's health, safety, and

Proposed Rule Making, Pharmacy Technician Training  
Washington State Board of Pharmacy  
May 23, 2008  
Page 3

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.”

We urge the Board to require successful completion of the PTCB examination for all pharmacy technicians who practice within the state of Washington. We also strongly suggest that the regulation require that training programs be accredited by the ASHP. By making an accredited training program and national certification a requirement for pharmacy technicians, the citizens of Washington State will be provided with basic protections for public health and the knowledge that those who we trust to handle our medications in a variety of settings are appropriately, consistently, and adequately trained.

ASHP applauds the efforts of the Washington State Board of Pharmacy to achieve greater uniformity in laws and regulations. By requiring PTCB certification and ASHP accredited training programs within state regulation, you will protect the health and safety of those who live and work in Washington state.

We appreciate the opportunity to provide these comments and would be happy to work with you as you continue to develop appropriate guidelines and requirements for the pharmacy technician profession. If you have any questions or comments, please do not hesitate to contact Geralyn Trujillo, Director of State Government Affairs (301-664-8687, [gtrujillo@ashp.org](mailto:gtrujillo@ashp.org)).

Sincerely,

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

Brian M. Meyer, M.B.A.  
Director, Government Affairs Division

Enclosures