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**To:** [ST\\_RegulatoryCounsel](#)  
**Subject:** [External] Regulation No. 16A-5433 (Pharmacy Technician Registration)  
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### **Comments for Regulation No. 16A-5433 (Pharmacy Technician Registration)**

Hi,

The proposed rule does not mention if the Pharmacy Technician Trainee can start working after applying for trainee registration. Do they need to wait while the application is being processed by board as it can take some time?

Below are the points which are to be considered **if possible** with Pharmacy Technician Trainees if **they can not start working in the hired role** before Pharmacy Technician Trainee registration is approved by the board.

- 1) For new Pharmacies or low volume Pharmacies, there might only be one Pharmacy Technician. If that Pharmacy Technician leaves for any reason, it puts pressure on the Pharmacist as they can not use the Pharmacy Technician Trainee while the registration is being processed by board even though the trainee is working directly under the Pharmacist.
- 2) If the Pharmacy Technician Trainee is told to wait to start working until the registration is approved, there is a high probability that the applicant might not even take up the job.
- 3) If the Pharmacy Technician Trainee is to be used as a cashier or Pharmacy clerk without vacancy for that role while trainee registration is being processed will create financial impact on Pharmacy. With current low reimbursements, Independent Pharmacies are already struggling and working with minimum staff. This will certainly create more financial stress.

Thought of passing these comments. Thank You for your help. Have a good day

Mahesh Paladugu  
Pharmacist