

March 13, 2024

RA-STPRegulatoryCounsel@pa.gov

Re: Regulation No. 16A-5433 (Pharmacy Technician Registration)



UPMC is supportive of this proposed rulemaking needed to effectuate Act 140 of 2020 by setting forth the criteria for pharmacy technician training programs as well as the standards of practice and registration fees for both pharmacy technicians and pharmacy technician trainees.

§ 27.705. Grandfather requirements for an existing practitioner to be registered as a pharmacy technician.

- Grandfathering regulations needs to be amended as the timeframe is too limited and refers only to 2019-2021 hires.
 - o Consider allowing managers to authorize the registration to bypass training requirements and authorize registration for existing workforce.

§ 27.91. Schedule of fees.

- Consider decreasing \$70 biennial renewal. The ratio remains high compared to pharmacist renewal vs. salary.

§ 27.12. Practice of pharmacy and delegation of duties.

- Consider language around direct and immediate supervision by a pharmacist, as there are going to be situations where a technician is working in a role where a pharmacist is not physically present (e.g., remote medication reconciliation technicians, remote verification, remote prior authorizations, and clinics).

§ 27.701. Qualifications for pharmacy technician registration.

- What's the process on becoming a board-approved training program?

§ 27.403. Conditions for administration.

- Pharmacists and interns for immunizations are mentioned, but what are conditions for technicians?

§ 27.703. Qualifications for pharmacy technician trainee registration.

- Does the introduction of registration also invoke individual liability insurance requirements?

Respectfully yours,

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