



From: [Longyhore, Daniel](#)
To: [ST, RegulatoryCounsel](#)
Subject: [External] Regulation No. 16A-5433 (Pharmacy Technician Registration)
Date: Monday, March 18, 2024 10:59:01 AM
Attachments: [image003.png](#)

ATTENTION: *This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).*

Thank you for reviewing this feedback regarding Regulations No. 16A-5433

27.701 / 273.702: The proposed regulations does not appear to recognize pharmacy technicians who have achieved and maintain (currently active) certification through the PTCB or NHA. The regulations state a technician must have completed a "board-approved pharmacy technician training program." If a pharmacy technician has passed the exam to be a certified pharmacy technician, they have met or exceeded the expectation of completing a training program. My concern comes if we have a future pharmacy technician apply for a job with us who is already certified, but not registered in Pennsylvania (think a technician who moves here from out of state). To get registered in Pennsylvania the technician would need to complete a training program despite already being certified and likely registered in another state. I would like to see the addition of language to include those who are a certified pharmacy technician (CPhT) through PTCB or NHA as qualified to register WITHOUT needing to complete a training course.

27.705: Pharmacy technicians may be grandfathered into registration without meeting the qualifications outlines in 27.701. There are two items I would appreciate clarified in the regulations.

1. The applicant must have demonstrated practice as a pharmacy technician for "at least 1 year" - I would appreciate clarification of 1 year based on hours worked as it will help better identify who qualified and who does not? My worry is without this clarification, applications to register will be denied because of insufficient hours worked during the 1-year period.
2. The dates between which a technician would need to work for at least one year need updating. The current range is 01/29/2019 to 01/29/2021. We are two years past the end date of this range, in which time many technicians have started work and have met the 1-year requirement. If the dates remain unchanged, it could have a negative consequence for those who started working after the 01/29/2021 start date as they would now need to complete a training course and it may discourage them from continuing as a pharmacy technician.

Thank you for receiving these comments.

Dan

[Daniel S Longyhore, Pharm.D, Ed.D., FCCP, BCACP](#)
System Director, Knowledge Management
[Enterprise Pharmacy](#)
100 N. Academy Avenue
Danville, PA 17822
(570) 214-1737 (admin)

IMPORTANT WARNING: The information in this message (and the documents attached to it, if any) is confidential and may be legally privileged. It is intended solely for the addressee. Access to this message by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, distribution or any action taken, or omitted to be taken, in reliance on it is prohibited and may be unlawful. If you have received this message in error, please delete all electronic copies of this message (and the documents attached to it, if any), destroy any hard copies you may have created and notify me immediately by replying to this email. Thank you. Geisinger Health System utilizes an encryption process to safeguard Protected Health Information and other confidential data contained in external e-mail messages. If email is encrypted, the recipient will receive an e-mail instructing them to sign on to the Geisinger Health System Secure E-mail Message Center to retrieve the encrypted e-mail.