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Sent:	Monday, March 25, 2024 1:46 PM
To:	IRRC
Subject:	Comments for Technician Registration Regulations

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Good afternoon,

Thank you for the opportunity to review and comment on the Technician Registration Regulations published by the Independent Regulatory Review Commission (IRRC) in the March 2nd, 2024 PA Bulletin.

As an employer of health-system pharmacy technicians, I would like to offer the following comments:

§ **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 (e.g., 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. This "grandfathering" period is no longer relevant and should be updated to a more pertinent time-period. We are suggesting **January 29, 2023, and January 29, 2025**.

Thank you,
Sarah

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