



From: [Jill McCormack](#)
To: [ST, RegulatoryCounsel](#)
Cc: [Dennis Giorno](#); [Nick Cicco](#)
Subject: [External] PACDS/NACDS Joint Comments on Pharmacy Technician Regulations
Date: Friday, March 29, 2024 11:35:18 AM
Attachments: [PA - Technician Registration Comments- 29 March 2024.pdf](#)

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Good Afternoon Ariel,

Please see our joint comments attached.

Thank you for the opportunity!
Jill

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March 29, 2024

Ariel O'Malley
Regulatory Counsel
State Board of Pharmacy
P.O. Box 69523, Harrisburg, PA 17106-9523

Submitted via email: RA-STRegulatoryCounsel@pa.gov

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

Dear Ms. O'Malley,

The Pennsylvania Association of Chain Drug Stores (PACDS) and the National Association of Chain Drug Stores (NACDS) thank the Pennsylvania State Board of Pharmacy (Board) for the opportunity to comment in support of the proposed rules implementing the registration requirements for pharmacy technicians and pharmacy technician trainees that were enacted under P.L. 1306, No. 140 in 2020. We urge the Board to expeditiously finalize these long-awaited rules that lay the foundation for needed policy changes to optimize Pennsylvania's pharmacy technician workforce and strengthen pharmacies' capacity to meet growing patient demand for a fuller array of pharmacy care services.

While most states have longstanding requirements and processes for registering pharmacy technicians, Pennsylvania has not yet implemented this for its pharmacy technician workforce. As a result, Pennsylvania remains behind the curve in advancing the roles of pharmacy technicians compared to other states – including states that border Pennsylvania.

During COVID-19 public health emergency, pharmacy technicians in Pennsylvania stood shoulder-to-shoulder with pharmacists on the front lines of care, coming to work when other healthcare venues were closed and enabling pharmacies to remain open and provide essential care to Pennsylvanians throughout this critical time. During this time, many pharmacy technicians in the state completed national certification so that – consistent with temporary federal allowances granted to pharmacy technicians across the nation under the PREP Act – they could participate in their pharmacies' efforts to deliver essential vaccine services. In doing so, these individuals worked together with the full pharmacy team led by pharmacists to enhance pharmacies' ability to expand access to care. Adopting this regulation will not only recognize pharmacy technicians' efforts in this regard, but it will also enhance the pharmacy workforce by attracting career-minded candidates, reduce turnover, and hinder job migration to border states where technicians are currently registered and eligible for advanced roles. Ultimately, this regulation enhances the capacity of pharmacies to provide essential healthcare services, promoting the health of patients and communities across Pennsylvania.

PACDS and NACDS thank the Board for the opportunity to share our perspectives on this important rulemaking. If you have any questions or need additional information, please contact PACDS' Dennis Giorno at dgiorno@malady-wooten.com or 717-236-9600 and NACDS' Jill McCormack at JMcCormack@nacds.org or 717-592-8977.

Sincerely,



Nick Cicco
President
Pennsylvania Association of Chain Drug Stores



Steven C. Anderson, FASAE, CAE, IOM
President and Chief Executive Officer
National Association of Chain Drug Stores