



From: [Victoria Elliott](#)
To: [ST, RegulatoryCounsel](#)
Cc: ["Rob Frankil"](#); [Rick Seipp](#)
Subject: [External] Comments: PA State Board of Pharmacy proposed regulation #16a-5433 "Pharmacy Technician Registration" (IRRC #3396)
Date: Friday, March 29, 2024 9:18:35 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[Joint Letter with Comments on Proposed Regs.pdf](#)

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](#).*

Dear Ariel,

Attached for your consideration are comments on the PA State Board of Pharmacy proposed regulation #16a-5433 "Pharmacy Technician Registration" (IRRC #3396) from the PPA, PARD and Value Drug Company.

Please do not hesitate to contact me with any questions. Have a nice holiday weekend.



**Victoria Elliott, RPh, MBA,
CAE**
CHIEF EXECUTIVE OFFICER
Pennsylvania Pharmacists Association

508 North Third Street
Harrisburg, PA 17101

717-234-6151 ext. 3
velliott@papharmacists.com
www.papharmacists.com

   



Pennsylvania
Pharmacists
Association

508 North Third Street
Harrisburg, PA 17101

Tel (717) 234-6151
Fax (717) 236-1618

✉ ppa@papharmacists.com
papharmacists.com

March 29, 2024

Regulatory Counsel
State Board of Pharmacy
P.O. Box 69523
Harrisburg, PA 17106-9523
RA-STRegulatoryCounsel@pa.gov

Dear Ms. O'Malley,

We are writing on behalf of the Pennsylvania Pharmacist Association (PPA), Value Drug Company, and Philadelphia Association of Retail Druggists (PARD) in support of the most recently released PA State Board of Pharmacy proposed regulation #16a-5433 "Pharmacy Technician Registration" (IRRC #3396).

Pharmacy technicians are a critical member of the pharmacy team to deliver pharmacy care to over 12 million Pennsylvanians. Our organizations recognize and support the need for registration and minimum education requirements for pharmacy technicians to help safeguard the public and the industry.

In addition to the currently proposed regulations, which should continue to final form without further delay, we ask that the following items be considered in the implementation of the regulations:

- Include that reporting of terminated pharmacy staff for drug-related reasons including adulteration, abuse, theft, or diversion **can also be reported by a pharmacy delegate.**
- Clarify that criminal history record checks are completed **by the employer and kept on file with the employer.**
- Use of an **employer attestation** for working as a pharmacy technician during tax years 2019 or 2020 in lieu of a W2/1099 form.

We believe that inclusion of these additional considerations will help clarify some open questions we are hearing from our constituents and should not be considered substantive changes to the regulations as currently published.

Thank you for your consideration. I can be reached by telephone (717-234-6151, x106) or email (velliott@papharmacists.com) should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Victoria E. Elliott".

Victoria E. Elliott, RPh, MBA, CAE
CEO – Pennsylvania Pharmacists Association