



PHARMACY
SOCIETY OF
WISCONSIN

Issue Paper

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Pharmacy Technician and Medication Safety Regulatory Requirements

Background

There is an increased interest and heightened awareness among pharmacy organizations, policy makers, and regulatory agencies alike regarding efforts to ensure that pharmacy systems and processes result in the safe dispensing of medications. With the continued increase in the number of prescriptions dispensed annually and due to regular quality improvement activities, pharmacy practices continue to rely more and more upon the use of automation and supportive personnel to increase the speed and efficiency of pharmacy dispensing processes.

Pharmacy technicians are a vital part of the pharmacy work force. The increasing volume and complexity of the medication preparation and dispensing process requires appropriate training and technical competence of all persons involved in the process, including pharmacy technicians. Although there is not national agreement on the education, training, certification, and regulatory control of pharmacy technicians that is needed, there is a growing realization that a minimum standard of some sort is necessary. Approximately 2/3 of state pharmacy boards license or register pharmacy technicians, according to a recent NABP survey of pharmacy laws (Appendix 1).

Recently the American Pharmacists Association and the American Society of Health-System Pharmacists have called for a requirement that all pharmacy technicians be certified. Legislation has also been recently introduced in the U.S. House of Representatives that would require pharmacy technician certification, formalize pharmacy technician training programs and require them to meet a national training standard, and require the reporting of medication errors to a national program.

PSW is pleased to join the Wisconsin Pharmacy Examining Board and others in the consideration of this subject in Wisconsin.

PSW Consideration and Findings

The Pharmacy Society of Wisconsin has considered the question of professional and/or regulatory expectations and requirements for pharmacy technicians in Wisconsin. The issue has been addressed by the PSW Board of Directors on multiple occasions and by subgroups of PSW from time to time, including the PSW Technician Section Board of Directors.

As a matter of professional principle and in the interest of public safety, PSW supports the right and responsibility of pharmacists licensed in Wisconsin in the dispensing of medications in the state. This responsibility extends to the proper training, management and oversight of pharmacy technicians involved in the medication preparation and dispensing process.

At question is what further state regulatory requirement, if any, should be established in order for a person to be eligible to work as a pharmacy technician in Wisconsin. In addition, there may be benefit from considering the related question of whether

701 Heartland Trail
Madison, WI 53717
608-827-9200
fax 608-827-9292
tome@pswi.org
www.pswi.org

pharmacies licensed in Wisconsin should be required to meet and adhere to specified training standards for pharmacy technicians in order to ensure safe dispensing systems.

In order to gain insight to current practices involving pharmacy technicians in Wisconsin and to obtain viewpoints of both pharmacists and pharmacy technicians toward training and credentialing of pharmacy technicians in the state, PSW conducted a statewide membership survey during the month of March on the subject. Approximately 400 pharmacists and 200 technicians completed the fifteen question survey. A complete summary of the survey results is attached as Appendix 2.

Areas of apparent consensus

The PSW survey and discussion resulting from consideration of the question of pharmacy technician credentialing revealed a general consensus on several items related to safety measures in the medication dispensing process, including:

1. A pharmacist practicing in a pharmacy licensed and located in Wisconsin should be responsible for the work and actions of a pharmacy technician employed by that pharmacy.
2. All Wisconsin pharmacies should have specific orientation and training programs for persons employed as pharmacy technicians.
3. All Wisconsin pharmacies should have written policies and procedures related to medication preparation and dispensing, including specific technician responsibilities and limitations.
4. All Wisconsin pharmacies should have an internal quality improvement program that focuses upon error identification and prevention.
5. Medication safety would be improved if prescribers of medications would include, on the prescription order, the indication for use associated with each medication.
6. The addition of regulatory requirements, specifically of pharmacy technicians, should consider the unique needs of pharmacy practices and the potential impact of such regulations upon the pharmacy workforce.
7. Of the regulatory options, registration of pharmacy technicians would cause the least disruption to the pharmacy workforce but it would only provide a general listing of persons working as pharmacy technicians in the state and would therefore have limited value. However, it is possible that a person could be required to meet certain criteria in order to be registered, such as 18 years of age, criminal background check, high school diploma or equivalent etc.

Areas of question and possible disagreement

Although there are many proponents of significantly increasing the requirements for a person to work as a pharmacy technician in this state and others, those proposals are met with question and uncertainty by others within the pharmacy profession. These items should be discussed in detail by interested individuals and organizations to determine whether a general agreement could be developed on how to proceed with any of the possibilities over time. Time will be needed to determine the appropriate course of action and attract people into the profession of pharmacy as technicians. Many pharmacies are having difficulty attracting and retaining technicians at this time and organizations will need time to meet any new requirements that are established.

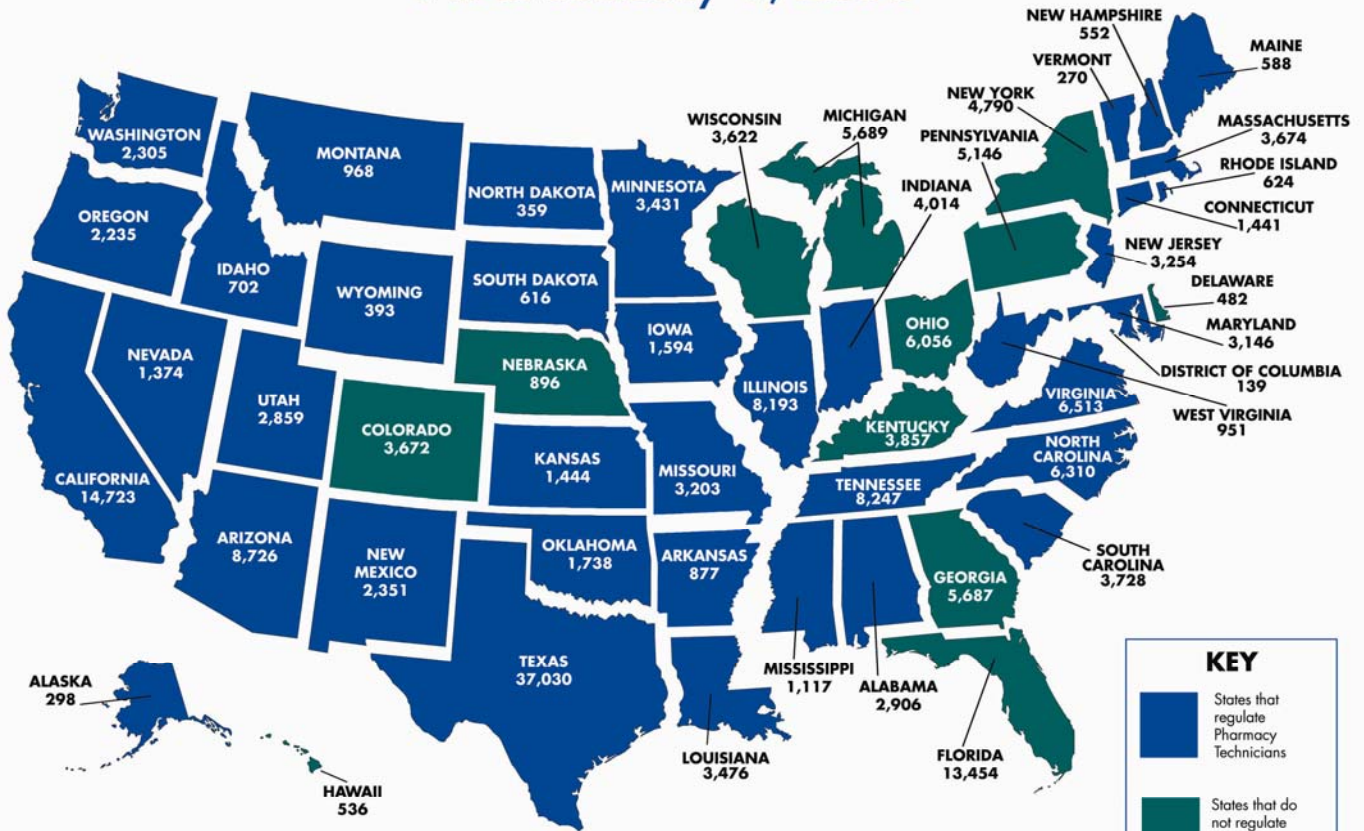
The following items are listed in the order of the likely magnitude of difficulty associated with their implementation.

1. State regulatory mandate that all pharmacy technicians be registered by the State of Wisconsin.
2. State regulatory mandate that all pharmacy technicians be certified by the Pharmacy Technician Certification Board (PTCB) or an equivalent certification program.
3. State regulatory mandate that all persons eligible to work as a pharmacy technician in Wisconsin have completed a training program specified by the Wisconsin Pharmacy Examining Board.
4. State regulatory mandate that all persons eligible to work as a pharmacy technician in Wisconsin complete a qualified educational program (i.e. degree program offered by an educational institution.)
5. A combination of any or all of the above.

PSW Recommendation on Proceeding

Because of the importance of equally ensuring the safety of the dispensing of medications and the determination of whether further pharmacy regulations would strengthen or detract from that safety, as well as determining the costs necessary to implement and administer additional regulations, PSW recommends that the Pharmacy Examining Board appoint a formal task force to consider the subject in detail. Precedent exists for the success of such a task force—the PEB convened a task force several years ago to determine state regulatory requirement for the compounding of sterile products and more recently for the revision of the patient consultation examination. PSW would be pleased to recommend persons with interest and insight in pharmacy technician credentialing possibilities and we would ensure that those persons represented the breadth of the state’s pharmacy practice environments.

Active PTCB CPhTs and State Regulations As of January 1, 2008



*Source: 2008 NABP Survey of Pharmacy Law. This information is advisory only; rules and regulations change. Contact your State Board of Pharmacy for updated information.