October 21, 2020

Anne Sodergren, Executive Officer

California State Board of Pharmacy

Sent to: Anne.Sodergren@dca.ca.gov; Lyle.Matthews@dca.ca.gov

Executive Officer Sodergren and Board of Pharmacy Members:

On behalf of [*The Coalition for the Advancement of Pharmacy Technician Practice*](https://info.nhanow.com/pt-coalition), we would like to thank the Board for your work during these unprecedented times and for your commitment to ensure the safety of the public. *The Coalition* represents a unified voice of pharmacy technicians across the state of CA and within various practice settings and was developed with a focus of bringing pharmacy technician organizations and associations together to support the efforts of advancing pharmacy technicians, during the current health crisis and beyond. *The Coalition*’s mission is to advocate to expand Pharmacy Technicians scope of practice and for the value that technicians demonstrate as they assist and serve patients’ needs during this health emergency.

Along with the CA BOP and the [Department of Health and Human Services](https://www.hhs.gov/about/news/2020/10/21/trump-administration-takes-action-further-expand-access-vaccines-covid-19-tests.html), we also have identified the need for expanded immunization services in order to continue to provide the highest level of care to patients. We are excited to see the Board’s Agenda item for “Discussion and Consideration of Authorized Duties of a Pharmacy Technician and Possible Expansion to allow for Administration of Influenza Vaccinations by Pharmacy Technicians”. The Coalition wishes to share their support of this proposal and ask the Board to consider broadening the scope to include ALL vaccines. This topic is of great importance and is supported by the research and evidence stated below.

It is expected that this flu and cold season to be far more challenging than any other year considering the added complications of COVID-19. Recent forecast polling shows a significant increase in the percentage of adults interested and planning to receive an influenza vaccine for the 2020-2021 season. CDC guidance reflects influenza vaccination being paramount to reducing the impact of respiratory illnesses in the population and resulting burdens on the healthcare system during the COVID-19 pandemic.

Pharmacies are a critical public health asset to the Fall 2020 annual influenza and COVID-19 resurgence. Pharmacy-based immunizations have been one of the most significant public health achievements in recent years. Patients have demonstrated high acceptance of pharmacy-based immunizations, with 97% of vaccinated patients surveyed reporting satisfaction with their experience in the pharmacy. About one in three adults who received the influenza vaccine in recent years did so at their community pharmacy. (1)

In order to meet the increased national vaccination demand to protect the public against preventable disease, we will need to have all capable people available to administer vaccines. In states in which pharmacy technicians have been permitted to administer vaccines, the pharmacist has remained responsible for the professional discretionary tasks associated with immunizations, such as clinical evaluation of a patient requesting an immunization, vaccine selection, and patient counseling, in states that allow technicians to administer immunizations. (2) In these states, technicians receive training on the technical aspects of immunization administration, including appropriate technique, handling an emergency, and CPR certification. Following this model, multiple retail pharmacies have led the way in proving technicians can safely administer immunizations to patients under the direction of a pharmacist. Technicians have successfully taken the administrative burden off the pharmacist by preparing and administering the immunization. This has allowed pharmacists to free up much needed time to review patient histories, and handle patient interactions that require professional judgement. (3)

*The Coalition* encourages the Board to move forward and adopt language that supports Pharmacy Technicians ability to administer immunizations. By taking this action, you will ensure that California is prepared to encounter the upcoming challenges. We appreciate your consideration and swift action to ensure pharmacies are fully equipped to help with the expected higher volumes of immunizations during this flu season.

Thank you for your time and consideration. If you have any questions related to *The Coalition* please reach out via our [website](https://info.nhanow.com/pt-coalition) or directly to myself at 913-424-2907 or Jessica.Langley@nhanow.com.

Jessica Langley-Loep, MS

Executive Director of Education & Advocacy - NHA

Representative for *The Coalition for the Advancement of Pharmacy Technician Practice*

References:

1. Dylan Atkinson, Alex Adams, and David Bright. "Should pharmacy technicians administer immunizations?" INNOVATIONS in pharmacy 8.3 (2017): 16-16.
2. Idaho, Utah, Rhode Island, Washington, and Nevada

3 - In 2016, Idaho was the first state to authorize technicians to administer vaccines under the direction of the pharmacist. Albertsons Companies was the first company to pilot this new task for technicians and now successfully allows technicians to immunize where allowed by state law. In addition to Idaho, the following states have a pathway for technicians to administer vaccines: Rhode Island, Utah, Nevada, and Washington. Over the last four years this has proven to be a valuable and efficient way to both remove barriers to pharmacists practicing at the top of their license, but also expanding access to important vaccines against preventable diseases.