

From: [Sunset Advisory Commission](#)
To: [Cecelia Hartley](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, June 27, 2016 4:01:14 PM

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, June 27, 2016 3:20 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD PHARMACY

First Name: Audra

Last Name: Conwell

Title: Chief Executive Officer

Organization you are affiliated with: Alliance of Independent Pharmacists of Texas

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City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

The Alliance of Independent Pharmacists (The Alliance) opposes Issue 1.1 recommending a strict requirement that pharmacists search the database (PMP) of prescribing and dispensing information and review each patient's history prior to dispensing controlled substances. While the PMP database is an exceptional tool for identifying the potential for abuse and over-prescribing in the future, the Alliance supports comments made by TSBP Executive Director Gay Dodson, R.Ph, that the technology required to integrate the PMP with existing systems for prescribers and dispensing pharmacies alike needs additional time to develop. Further it is the Alliance position that recommendations requiring a pharmacist query the PMP for signs of abuse prior to filling each prescription should be done in the professional judgement of the dispensing pharmacist. The latest technology provides exceptional tools for physicians and pharmacists to assist with recent trends on prescription drug abuse, these tools are most effective when used with the professional discretion of the pharmacist.

The Alliance position on Issue 1.1 allows the discretion of the pharmacist to intervene when reviewing patient history on dispensing of controlled substances. As a practical matter, pharmacists have a significant volume of prescriptions to fill each day.

A patient review can become a system of procedure rather than professional judgement. Allowing judgement and discretion allows a practical approach that is certain to be a more effective.

The Alliance supports Issue 3 to continue the TSBP for 12 years, develop a policy for negotiated rule-making and alternative dispute resolution and prepare for succession planning.

Any Alternative or New Recommendations on This Agency:

The Alliance supports the intent of the recommendations in Issue 2 to conform licensing standards with common licensing practices and adds an additional recommendation on Issue 2.4. The Alliance supports creating a system of continuing education requirements for pharmacy technicians and also supports a clear directive in statute to require the Board of Pharmacy to approve more than one pharmacy technician certification exam and training program.

It is the Alliance's position that multiple private certification and testing authorities provide pharmacy technicians access to multiple pharmacy technician certification examinations. The diversity of pharmacy practices within the healthcare industry has continued to expand. Access to additional programs will provide pharmacy technicians with the ability to meet certification examination requirements consistent with their job description and responsibilities using training and exam tools appropriate to their practice setting.

My Comment Will Be Made Public: I agree