

David L. Dubose R.Ph.

CRITICAL ISSUES AFFECTING TEXAS PHARMACIES

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Executive Summary

Texas will have a potential shortage of over 18,000 employees in the support role as pharmacy technicians or technicians in training in the year 2020. Pharmacy technicians perform technical tasks that do not require professional judgement of the pharmacist. Texas began regulating pharmacy technicians due to concerns about theft and loss of drugs. All applicants seeking a pharmacy technician license must have a high school diploma or equivalency and pass a board-approved national certifying exam. Today there are two exams, the Pharmacy Technician Certification Exam (PTCE) and the Exam for Certification of Pharmacy Technicians (ExCPT) which are *ACCREDITED* by the NCCA (National Commission for Certifying Agencies). Texas has limited their selection to one exam, the PTCE.

In the year 2020, the PTCB will change their requirements to sit for the PTCE exam. The future Pharmacy Technician will have to attend an ASHP accredited school. There are currently 28 accredited colleges or vocational schools located in 15 counties leaving 239 counties with no way to train technicians. Some of these counties include: Walker, Robertson, Polk, Liberty, Webb and Williamson. There will be no home study or employee based training and high schools will no longer be able to offer pharmacy technician training programs in all 254 counties.

Two exams would give the options:

1. Go to college and take the Pharmacy Technician Certification Exam (PTCE)
2. Home, school, or employee based training (draw from their communities) and take the (Exam for Certification of Pharmacy Technicians) ExCPT

Why put in place barriers when the employer has the ability to set its own hiring requirements, and thus if a college degree is desirable, the employer can set that requirement?

Note:

The PTCB has paid over \$2.5 million in royalties to the National Association of Boards of Pharmacy from the years 2011 to 2014.

Critical Issues Affecting Texas Pharmacies

1. Pharmacy technicians and technician trainees:

- a. Technicians perform technical tasks that do not require professional judgement, such as counting and labeling medications, and must work under the supervision of a pharmacist.
- b. Texas began regulating pharmacy technicians more recently in 2004, due to concerns about theft and loss of drugs.
- c. All applicants seeking a pharmacy technician license must have a high school diploma or equivalency and pass a board-approved national certifying exam.
- d. Prospective pharmacy technicians may choose to first apply for technician trainee status, which allows the trainee to gain experience for up to two years before taking and passing the certifying exam.
- e. In fiscal year 2015, the board registered 41,990 pharmacy technicians and 18,777 technician trainees.

2. **Pharmacy Technician Certification Board (PTCB) requirements for 2020:**

- a. All schools teaching must have American Society of Health System Pharmacists (ASHP) accreditation
- b. Requiring future technicians to attend a college or vocational tech school
- c. Cost ranging from \$3,645 to \$23,220 – plus room and board
- d. 28 accredited colleges/vocational technical schools
- e. Length of 1 to 2 years
- f. No home study or employee based training

3. **Facts:**

2014 – Texas has registered with the Texas State Board of Pharmacy (TSBP):

Pharmacy Technicians 41,700

Pharmacy Technician trainees +15,751

57,451 total number of licenses

2015 – Texas has registered with the Texas State Board of Pharmacy (TSBP):

Pharmacy Technicians 41,990

Pharmacy Technician trainees +18,777

60,767 total number of licenses

- a. Texas keeps about 60,000 Certified Pharmacy Technicians (CPhTs) and technicians in training
- b. Texas has a 25% turnover rate each year
- c. Texas will need 15,000 technicians or technicians in training each year to meet demands
- d. 28 colleges and vocational schools in Texas, each with a class potential of 20 to 30
- e. If colleges and vocational schools have a class of 30, we will need 500 schools in Texas
- f. Year 2021: the 28 Colleges and Vocational schools would graduate 840 students, a shortfall of 14,160 Certified Pharmacy Technicians (CPhTs)
- g. Year 2022: another 14,160 short; at that rate, a 50% shortage of Certified Pharmacy Technicians (CPhTs) in 2 years
- h. Shortfall does not include Bureau of Labor Statistics of a 20% growth by 2022.

4. Concerns facing Texas Pharmacies:

- a. Demand and competition for technicians will be exorbitant
- b. Texas has 254 counties with the 28 schools located in 15 counties. (See attached map)
 - 1. Pharmacies in smaller counties have a problem recruiting Pharmacists, how will they recruit technicians?
 - 2. Harris County has 9 schools, Dallas and Tarrant have total of 5
- c. Chain stores with American Society of Health System Pharmacists (ASHP) programs will become training grounds for all.

5. Solution: Texas State Board of Pharmacy should recognize both the Exam for Certification of Pharmacy Technicians (ExCPT) given by NHA (National Healthcareer Association) and the Pharmacy Technician Certification Exam (PTCE) given by the PTCB (Pharmacy Technician Certification Board)

- a. Both Pharmacy Technician Certification Exam (PTCE) and Exam for Certification of Pharmacy Technicians (ExCPT) are *ACCREDITED* by the NCCA (National Commission for Certifying Agencies)

- b. Passing of either test earns you the designation of a nationally Certified Pharmacy Technician. (CPhT)
- c. Home or employee based training allows local pharmacies to draw from their communities

6. Texas State Board of Pharmacy had the exams evaluated by a 3rd party evaluator:

Evaluator #1	NHA (ExCPT)	Score 576
	PTCB (PTCE)	Score 592
Evaluator #2	NHA (ExCPT)	Score 530
	PTCB (PTCE)	Score 554

7. An interesting fact:

- a. Pharmacy Technician Certification Board (PTCB) exam pays royalties to:
 - 1. ASHP (American Society of Health-System Pharmacists)
 - 2. APhA (American Pharmaceutical Association)
 - 3. NABP (National Association of Boards of Pharmacy)
 - 4. ICHP (Illinois Council of Health-System Pharmacists)
 - 5. MPA (Michigan Pharmacist Association)

Each received \$2.5 million from 2011 to 2014
- b. The ExCPT (Exam for Certification of Pharmacy Technicians) exam pays royalties to:
 - 1. NCPA (National Community Pharmacists Association)
 - 2. NACDS (National Association of Chain Drug Stores).

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and take the (Exam for Certification of Pharmacy Technicians) ExCPT

End result is a Certified Pharmacy Technician (CPhT).

Notes

- The Texas State Board Pharmacy does not require a Certified Technician to renew their certification once they register with the Board.
- Texas is the only state that selects its approved certifying organization through a Request for Qualifications (RFQ) process.
- They have used this process twice, most recently in 2014.
- Every four years, the Board posts a Request for Qualifications (RFQ) to solicit a certification “vendor.” The document lists the minimum qualifications of the vendor, as well as a long list of documentation that interested parties must provide.
- Several psychometricians appointed by the Board then review the application materials and rate the quality of the responses on a numeric scale.
- The Board then reviews the scores and commentary, and they make a determination about which organization should win the bid.
- While there is no language in Texas statutes, regulations, or the Request for Qualifications (RFQ) to limit the Board to selecting just one vendor, they have historically limited their selection to just one vendor.
- Accordingly, they have selected Pharmacy Technician Certification Board (PTCB) exclusively. It should be noted that the scores of both organizations have been very close both times, with Pharmacy Technician Certification Board (PTCB) slightly ahead. In the recent 2014 Request for Qualifications (RFQ), the difference in scores was only 3.5%.
- An objective third party could argue that the scores were so close that the Board could justify selecting two vendors. However, that is not the path they chose.

Summary

1. Can enough Texans be attracted to pharmacy technician work to meet the demand if the proposed PTCB educational requirements are put in place in 2020?
 - Cost of educational programs.
 - Declining inquiries and completion rates already happening.

2. With limited pharmacy technician educational opportunities outside of the 15 counties with ASHP accredited programs, will trained pharmacy technicians be attracted to seek employment in the other 239 counties?
 - Employer based Training allows local pharmacies to draw from their communities.
 - Higher educational requirements will require attracting pharmacy technicians from counties with schools to counties without schools.
3. Can the Board demonstrate that the heightened barriers to entry – Associate's Degree coupled with ASHP-accredited pharmacy technician training – will address the stated concern of diversion (theft) of medications?
 - Is there any evidence that demonstrates that in-house trained pharmacy technicians cause greater diversion than those with school-based training? Associate's Degrees? ASHP-accredited training?
4. How does a general Associate's Degree relate to the tasks to be performed by an entry level pharmacy technician?
 - Said differently, why put in place barriers when the employer has the ability to set its own hiring requirements, and thus if a college degree is desirable, the employer can set that requirement?
5. In states where pharmacy technician certification is required to practice, 16 out of 21 recognize both the ExCPT and the PTCE.
6. Effective January 1, 2020, over 18,000 pharmacy technician trainees will be unemployed. This creates a workforce issue for all pharmacies.

Thank you,
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Issue 2

Key Elements of the Texas State Board of Pharmacy's Statute Do Not Conform to Common Licensing Standards.

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