

From: [Sunset Advisory Commission](#)
To: [Cecelia Hartley](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
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From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, June 28, 2016 12:40 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD PHARMACY

First Name: Everett

Last Name: McAllister

Title: Executive Director & CEO

Organization you are affiliated with: Pharmacy Technician Certification Board

Email: emcallister@ptcb.org

City: Washington

State: District of Columbia

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

Dear Committee Members:

The Pharmacy Technician Certification Board (PTCB) is the national standard for the body of knowledge required for pharmacy technicians. In addition to a track record of quality spanning over 20 years and with over 275,000 certified pharmacy technicians nationwide, of whom over 39,000 work in Texas,
PTCB:

** Is always investing resources in getting better. We sponsored the first in a series of planned research reports regarding pharmacy technicians in 2015. These reports, a joint effort by PTCB and other national pharmacy organizations, are designed to identify and evaluate the roles of the technician with an emphasis on the relationships between standardized certification, patient safety, education/training, drug diversion, and retention.

** Is the only pharmacy technician organization that has a robust Code of Conduct program. PTCB partners with State Boards of Pharmacy to share disciplinary information so that technicians cannot simply cross state lines to circumvent conduct issues. This assists Boards of Pharmacy with drug diversion enforcement and prevention initiatives. PTCB is also working to integrate its systems with the National Association of Boards of Pharmacy (NABP) to increase this capability.

** Is 100 percent focused on pharmacy technician certification. PTCB is governed by, and partners with, the pharmacy industry. PTCB is a non-profit as opposed to a for-profit company (National Healthcareer Association) which is owned by another for-profit company (Ascend Learning), which is owned by a private equity firm (Providence Equity Partners).

** Has relationships with 216 education/training programs in Texas, and with 18 employers, not inclusive of PTCB's national employer partners (e.g., Walgreens, CVS).

** Institutes program changes based on continual systematic reviews of certification requirements. These changes elevate standards for meeting the demands of an evolving healthcare system.

** The PTCB certification program is the most widely recognized and trusted certification program and is endorsed, through national policy statements, by the majority of national pharmacy organizations, pharmacy education associations, and by NABP.

** A benefit of PTCB certification is the portability of the credential. Our program is recognized in all 50 states, thereby allowing a CPhT to relocate as needed without jeopardizing their status as a certified technician.

Texas Chose the Superior Program

The Pharmacy Technician Certification Exam (PTCE) is administered and accepted in all 50 states, DC, Guam, and Puerto Rico. Twenty-three states and DC include national certification in their regulations. Five of those states require PTCB certification exclusively. The Texas State Board of Pharmacy conducted a review that analyzed the PTCE and NHA programs' strengths and weaknesses as they pertain to industry standards, with the goal of identifying the superior program as judged by independent psychometric experts. PTCB's program was selected by the Texas Board in the comparison both times (2010 and 2014).

It has been noted previously that the evaluation scores were close. While this may be technically accurate, one needs only a cursory review of the evaluators' comments from 2014 to draw clear distinctions. The first evaluator noted only one weakness in PTCB's proposal vs. nine for NHA. The second offered the following comments in comparing PTCB and NHA:

- ** Based on the discussion on page 55 of the proposal, NHA does not understand item exposure. PTCB does.
- ** NHA gives a very vague description on page 73. PTCB has a much more sophisticated set of data kept, which is superior to NHA's method.
- ** For the most part, the differences in the two proposals seem minor. Both testing organizations appear capable. However, the item bank and how items are developed and validated are crucial to achieving high validity. In this regard, PTCB is the superior organization.
- ** PTCB is a clear choice.

Availability of Technician Education and Training

In 2020, PTCB plans to require accredited education for technicians pursuing initial certification. Currently certified technicians will not be subject to this new requirement. Concerns have been raised about the availability of accredited programs in Texas and how a perceived shortage might negatively affect the technician workforce.

PTCB is actively monitoring the supply of accredited programs in Texas and elsewhere. We regularly interact with state boards of pharmacy, employers, and educators. We are committed to providing various opportunities for stakeholders such as TSBP to inform the implementation process. PTCB also conducts regular surveys to allow the community to have input into program decisions.

The concerns noted above, while important, also assume a static Pharmacy profession. We have detailed below just a few examples of the changes occurring in technician education and training:

** There is a growing availability of widely accessible and soon-to-be accredited programs that are offered in a distance learning (i.e., online) or hybrid format. The availability of these programs will provide education opportunities for rural and remote areas of the state.

** There are several new or existing pharmacy technician education programs that are actively pursuing accreditation. In addition, several major health system pharmacies are evaluating the possibility of pursuing accreditation for educating future hires. There are also collaborative efforts between colleges of pharmacy and pharmacy technician education programs to increase the number of PTCB certification exam-eligible technicians.

** Accredited institutions are developing "pathway" programs that allow high school juniors and seniors to

complete many of the required, accredited program courses while they are in high school. They are then eligible for PTCB certification following graduation. Students in these programs are able to take college credit courses at no additional cost and can enter into a respected career without additional debt.

** An increasing number of technician education/training programs within large pharmacy employers (e.g., Walgreens, CVS Health, Walmart) are either already accredited or actively pursuing accreditation.

Strong Partnership

PTCB and TSBP have years of history working together. PTCB provides a self-service portal for TSBP to monitor the certification status of the technician workforce. Despite the fact that maintaining PTCB certification is not a formal requirement for Texas pharmacy technicians, at the end of 2015 approximately 94% of registered technicians in your state chose to keep their certification current through PTCB. Additionally, TSBP provides PTCB with technician discipline information on a quarterly basis. PTCB uses this information to conduct inquiries that often lead to revocation or suspension of certification. Choosing a single provider for technician certification facilitates a higher degree of Board oversight, efficiency and quality assurance.

PTCB applauds the leaders of the state of Texas for your dedication to the pursuit of the best regulatory solution for pharmacy technicians. PTCB stands firm in its commitment to Texas for its efforts focused on the promotion, preservation, and protection of the public's health, safety, and welfare by ensuring the highest standards in the practice of pharmacy.

Very Respectfully,
Everett B. McAllister, MPA, RPh
CEO & Executive Director

Any Alternative or New Recommendations on This Agency: None.

My Comment Will Be Made Public: I agree