

Written Testimony Concerning the Board of Pharmacy's Impediments to Consumer Choice in Selecting Pharmacy Technician Certification

To: Texas Sunset Advisory Commission
From: Lyndsey McDonald, Director
National Healthcareer Association (NHA)
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Chairman Gonzales, Senator Taylor and distinguished members of the Texas Sunset Advisory Commission, thank you for the opportunity to submit written testimony concerning the Texas State Board of Pharmacy. NHA is one of two providers of nationally accredited pharmacy technician certification exams. Although the Board is authorized, both by law (*see* Tex. Occ. 568.001(a)(1)(B)) and by its own regulations (*see* 22 Tex. Admin. Code § 297.3(c)(1)(B)(i)), to approve more than one certification exam for pharmacy technicians, to date it has approved only the exam offered by the Pharmacy Technician Certification Board (PTCB) and the Chair has openly stated that the Board intends to only approve one exam. NHA believes that this self-imposed limitation of the Board's authority has and will have a negative impact on employers of pharmacy technicians in Texas and Texas citizens seeking to enter the profession.

NHA is the provider of the Exam for the Certification of Pharmacy Technicians (ExCPT) and PTCB is the provider of the Pharmacy Technician Certification Examination (PTCE). Both exams are accredited by the National Commission for Certifying Agencies, are subject to rigorous third party review and require continuing education for re-certification.

The Board has evaluated the psychometric quality of both the ExCPT and the PTCE twice in the last six years, most recently in 2014. For the 2014 evaluation, the Board selected two psychometricians as the panel to conduct the review. The panel scored each exam against 51 categories and again both exams received very high scores – PTCE's overall "grade" was 96 and ExCPT's was 93.¹ Although the differences in the scores were de minimis, the Board continued to approve only the PTCE. The California Office of Professional Examination Services (OPES), which conducted both a psychometric and occupational evaluation of the PTCE and ExCPT, similarly concluded that both exams were psychometrically sound. OPES, however, strongly critiqued the PTCE, flagging 43% of the topics covered by the PTCE as being inappropriate for assessing the readiness to practice as an entry-level pharmacy technician.²

¹ The total combined score across both evaluators for PTCE was 1146 out of a total possible score of 1190, or 96%. The total combined score across both evaluators for ExCPT was 1106 out of the total possible score of 1190, or 93%.

² Please see the appendix to this testimony for more on these evaluations and, particularly, the occupational evaluation of OPES. Unlike a psychometric evaluation, which is solely focused on the process by which the exam is developed, the objective of an occupational evaluation is to review the actual content of the exam and determine whether it covers the right topics and asks the right questions to assess competency, in this case, to practice as an entry-level pharmacy technician.

NHA cannot explain why the Board is steadfast in its one-exam policy. Given significant changes announced by PTCB, however, the Board's one-exam policy, if it continues, will place costly burdens on pharmacy technician employers and threatens to create a shortage of pharmacy technicians to serve Texas communities. Although the PTCB has allowed anyone with a high school diploma or equivalent to sit for the PTCE since its inception³, it has announced that starting in 2020 only candidates that have completed an ASHP-accredited pharmacy technician program can sit for the PTCE.⁴ The requirements for ASHP accreditation are high. While there are a few postsecondary schools in Texas that offer ASHP-accredited programs, these schools graduate only a small fraction of the number of pharmacy technicians needed in Texas. Moreover, the cost of postsecondary education, particularly given the low pay offered pharmacy technicians, may deter individuals from entering the field should formal education become the only pathway to certification, as will be the natural result of PTCB's eligibility proposal when coupled with the Board's one-exam policy.

Most pharmacy technicians are trained by the national retail pharmacy chains, each of which have invested in comprehensive training programs for their retail pharmacy technicians. As a representative of Walmart testified before the Board at its May 3, 2016 meeting, not only does ASHP accreditation require him to invest in training his *retail* pharmacy technicians in *hospital* pharmacy practice, but it also leaves Walmart exposed to pharmacy tech poaching by institutional pharmacies. Many other stakeholders have expressed similar concerns and have encouraged the Board to resolve the problems created by PTCB's new eligibility barrier to certification by approving a second exam, the ExCPT.

Pharmacy technicians often are seeking their first "professional" job after high school, are college students that work to fund their education or are the first person in their family to complete any post-secondary education or to hold professional credentials. These people need Board policies that both protect public safety and support pathways to a better future, not present hurdles. Pharmacies and employers need the Board to adopt policies that are in the public interest, which includes policies that respect the difficulty of pharmacies, particularly those serving rural communities, to stay in business, manage costs and obtain qualified staff. Instead the Board is favoring a policy that allows a third-party vendor, PTCB, to impose costly obstacles on pharmacy technician employers. Both the ExCPT and PTCE are solid certifications that clearly serve the purpose of protecting public safety. The Board's one-exam policy is flawed and is a barrier to the Board meeting its secondary responsibilities to stakeholders.

Thank you for the opportunity to submit this testimony to the Commission.

³ NHA has long had eligibility requirements for ExCPT candidates: (1) completion of a training program offered by an accredited or state recognized school; (2) employer-based training approved by the Board; (3) at least 1200 hours of supervised pharmacy-related work experience; or (4) pharmacy-related training offered by any branch of the US Military. These pathways were developed to ensure that each candidate had the training or experience necessary to practice, that such training or experience was obtained under the guidance of pharmacy tech educators or pharmacists, and that the candidate had made a tangible commitment to the field.

⁴ ASHP is a founder of PTCB: its CEO is the Chair of PTCB's Board of Governors and PTCB pays ASHP large royalties annually.