

Significant Analysis  
for Rule Concerning Pharmacy Technician  
National Standardized Examination,  
WAC 246-901-030 and WAC 246-901-060

**Background:**

In 2002 the American Council for Pharmacy Education (ACPE), at the request of the Council on Credentialing in Pharmacy (CCP), began looking at the issue of developing national standards and an accreditation process for pharmacy technician education and training. It was clear, from the input that the ACPE received from stakeholders, that the appropriate utilization of pharmacy technician and other supportive personnel had become a critical part of the delivery of quality pharmaceutical care in virtually all pharmacy practice settings. Thus, began a national effort to standardize the education and training for pharmacy technicians based on core competencies.

The Washington State Board of Pharmacy has established standards in education and training for pharmacy technicians for over 25 years.

All training programs are reviewed and approved by the board.

Type of Training Program	Minimum Instruction Required	Minimum Hours of Washington Pharmacy Law Study
On-the-Job Training	520 hours	8
Formal Academic Programs	2 quarters of 30 academic quarter credits w/ 160 hours supervised work experience	8
Vocational Training	800 hours w/ 160 hours of supervised work experience	8

All categories of training program must conduct a final examination to measure the candidate's level of learning.

Because the examinations are developed by the training programs there is no standardized mechanism to evaluate pharmacy technicians' knowledge and skill level. This has provided some challenges since pharmacy technicians are used in a wide variety of practice settings:

- Community/Retail pharmacies - pharmacies that are independently owned or are small corporations with no more than five locations providing pharmaceutical services to the communities in which they are located.
- Corporate/Chain Store Pharmacies – pharmacies that are corporately owned and have multiple locations throughout the state, region or nationally. These pharmacies provided pharmaceutical service to the communities in which they are located.
- Hospitals – pharmacies that provide services to in-patients and emergency room patients of a hospital.

- Long term care – pharmacies that provide services to long-term care and assisted living facilities. These pharmacies can also provide services to the community or “closed door.”
- Other Pharmacies – pharmacies located in correctional facilities, government operated pharmacies, or pharmacies that provide specialty services such as nuclear medicine, compounding, etc.

In 2003, the Washington State Board of Pharmacy began stakeholder work to examine the advantages and disadvantages of requiring pharmacy technician to successfully pass a national standardized certification examination.

In 2005, the board reaffirmed its commitment and held additional stakeholder workshops. On August 31, 2006, the board adopted proposed rule language to require new credentialing requirements for pharmacy technician certifications.

Recently, national attention has focused on the qualifications of pharmacy technicians. An article in *USA Today* highlighted possible negative outcomes to patients’ health and safety when a pharmacy technician is under or inadequately trained. Legislation introduced by Congressmen Steve LaTourette from Ohio, referred to as the Pharmacy Technician and Registration Act, calls for standardized training and registration for pharmacy technicians.

**Briefly describe the proposed rule.**

The Board of Pharmacy is proposing to require pharmacy technician candidates to take a standardized examination to evaluate the knowledge and skill level of pharmacy technician candidates prior to certification in Washington State.

In recognition of the disparity in the current examination process, the proposed rule will require applicants for pharmacy technician certification to successfully complete a national standardized pharmacy technicians’ examination approved by the board. This change in standards will provide a reliable tool for assessing a candidate’s competencies. The proposed rule would also eliminate the need for individual pharmacy technician training programs from having to develop their own exams.

It is anticipated that the proposed rule will assure a reliable and consistent evaluation of the education and training of pharmacy technician applicants. The examination will help assure that technicians possess the basic skills to assist pharmacists in the practice of pharmacy in all practice setting and will improve the quality of care for patients.

The proposed rule will require amending WAC 246-901-030 (3) (b) – Proof of successful completion of a “certification examination approved by the Board” and WAC 246-901-060 “Technician Certification”, to include the requirement for successful completion of a national standardized examination prior to certification in Washington State.

Portions of the amended rules WAC 246-901-030 and 060 do not require a significant analysis because they clarify existing language or adopt housekeeping changes.

**Is a Significant Analysis required for this rule?**

Yes. A significant analysis is required because the proposed rule sets new standards for which an individual must comply with in order to obtain a pharmacy technician certification. In addition, it was determined that costs may be incurred by training programs, specifically OTJ programs, in providing applicants the basic knowledge and skill to practice in all pharmacy settings.

**A. Clearly state in detail the general goals and specific objectives of the statute that the rule implements.**

RCW 18.64A.020 Rules-Qualifications and Training Programs – states in part: The board shall adopt rules fixing the classification and qualification and educational and training requirements for persons who may be employed as pharmacy technicians...Such rules may include successful completion of examination for applicants for pharmacy technician certification.

The general intent of the statute is to establish minimum standards of knowledge and skill of pharmacy technicians to protect and improve public health and safety. The proposed rule meets the intent of the statute by requiring pharmacy technicians to successfully complete a national standardized examination. The examination will ensure a reliable assessment of applicants' minimum education and competencies needed to successfully contribute to the practice of pharmacy. The examination will not replace experiential training requirements.

**B. Determine that the rule is needed to achieve these goals and objectives, and analyze alternatives to rulemaking and the consequences of not adopting the rule.**

The rule is needed to clearly communicate new requirements and establish enforceable standards for certification as a pharmacy technician. The standards for a board-approved examination would change with the adoption of this rule.

As more medications become available and as our population ages, patients' demands for pharmaceutical services increase. The team of pharmacist and technician are critical to the delivery of pharmaceutical care. The better qualified the pharmacy technician, the higher the quality of care this team may bring to the patient and the greater the value they bring to the pharmacy. A standardized exam would provide an equitable and objective means to measure a candidate's level of competency of basic pharmacy technician job responsibilities regardless of practice setting.

The intent of the proposed rule is to standardize the exam used to evaluate whether an individual has achieved a certain level of competency. As an alternative, the board could adopt and develop a standardized exam. However, a national standardized examination provides several benefits, 1) no cost to the programs to update or defend; 2) convenience to test at multiple locations and various times throughout the year; 3) national certification boards may assist with pharmacy technician seeking credentialing or employment in multiple states.

**C. Determine that the probable benefits of the rule are greater than its probable costs, taking into account both the qualitative and quantitative benefits and costs and the specific directives of the statute being implemented.**

National standardized exams that are written using job/position analysis to clearly define the performance areas, tasks and the associated knowledge and skill sets for pharmacy technicians. The content of the exams are determined based on essential functions and the time a technician spends on various job tasks.

Probable costs

In analyzing the possible costs, the board conducted a survey of active board-approved technician training programs. At the time of the survey, there were 179 board-approved on-the-job training programs and 23 approved academic courses. The OTJ programs were broken down into practice sites to include: community/retail pharmacies (50 employees or less), long-term care pharmacies, hospital pharmacies, other (correctional/public health facilities or specialty pharmacies) and chain store pharmacies (more than 50 employees). Approximately twenty percent of each category was asked to participate in a survey to determine if the proposed rule would have a disproportionate impact for smaller business verses large business. Of the forty-five sites solicited 16 responded.

Random samples of approximately 20% of pharmacies from each category were selected to participate in the survey.

The pharmacies were asked to evaluate their current training program on its ability to prepare an applicant to pass a national standardized examination. Each pharmacy was provided content outlines for examinations administered by the Pharmacy Technician Certification Board (PTCE) and of the exam content for the Institute for the Certification of Pharmacy Technicians (ExCPT).

Costs to pharmacy businesses are primarily associated with updating their current programs and providing the necessary instructions to pharmacy technicians to perform activities related to various pharmacy practice sites. Some training programs may choose to coordinate rotations with alternate practice sites for experiential training. Fiscal impact may include the cost for off-site training, travel reimbursements for trainees, or costs for additional staffing to cover work performed by absent ancillary staff.

Costs estimates were assessed based on the need to revise program curriculum and the cost of staff to provide additional didactic and experiential training.

Responses were received in the following categories:

Categories Surveyed	# Surveyed	# Responded	Business		# Surveyed Reporting No Costs	Estimated Cost Reported	Average Cost of Compliance Per Employee*
			Large > 50 employees	Small < 50 employees			
Chain Store Pharmacies	5	1	✓			\$2200	\$13**
Community/Retail Pharmacies	26	9		✓	3	\$5665	\$59
Other Pharmacies	2	0		✓		-	
Hospital Pharmacies	3	1	✓			\$31,060	\$58
Long-term Care Pharmacies	4	3		✓		\$9135	\$190
Academic/Vocational Programs	5	2	✓		1	\$200	\$10

\*Average cost per employee calculated based on total costs reported divided by the average number of staff per pharmacy reporting costs (average number of staff based on NAICS data).

\*\*Average cost per employee was calculated based on actual staffing levels reported by the corporation responding to the survey.

### Probable benefits

Pharmacy technicians perform an important role in the practice of pharmacy. Their tasks focus on helping with the preparation of the patients' prescribed medication; such as, labeling bottles, counting pills, and prescription data entry. Due to pharmacist shortages and the steady increase in prescriptions, a pharmacy technician's role has become even more critical to the operation of a pharmacy and access to health care.

According to the National Pharmacy Technician Association (NPTA) research has shown that pharmacy technicians are involved with the input, preparation and/or filling of more than 96% of the prescriptions dispensed in community pharmacies. Pharmacy technicians are typically the first and last staff member to interact with patients at retail pharmacies; often they are the only staff member to interact with the patient.

The proposed rule will benefit board-approved Washington technician programs by eliminating the need to update or defend their testing methods or criteria.

Multiple testing sites offered by private testing agencies or associations will offer convenience to applicant in scheduling exams and may assist Washington pharmacy technicians' who seek credentialing in other states.

Requiring pharmacy technician applicants to pass a standardized national examination will ensure that the basic level of knowledge and skills are measured consistently for all applicants. The potential benefits to patients and employers are outweighed by the costs incurred by training programs when technicians are prepared to work with pharmacist in all practice setting.

**D. Determine, after considering alternative versions of the rule, that the rule being adopted is the least burdensome alternative for those required to comply with it that will achieve the general goals and specific objectives stated previously.**

The Department of Health staff worked closely with stakeholders and the public to minimize the burden of this rule. For example, the Board held stakeholder rule writing workshops in Kent and Yakima. Draft rule language was distributed electronically through established interested parties list for input and to elicit thoughts on the cost benefits of adoption. Stakeholder comments, concerns and suggested changes were presented to the Board to assist in drafting the proposed rule.

In the course of these and other efforts, the following alternative version(s) of the rule were rejected:

Alternative	Least-burden Assessment
Require all pharmacy technician applicants and those currently certified to successfully pass a national standardized examination.	The current approach incorporates a “grandfathering clause” allowing those currently credentialed in Washington State to maintain their certification without completion of a national standardized examination. This approach recognizes the proficiencies gained through on-the-job experiences.
Declare in rule the Pharmacy Technician Certification Exam (PTCE) as the Board-approved national standardized examination.	The proposed rule does not name a specific examination as Board-approved acknowledging, 1) there may be other reliable, psychometrically sound and legally defensible exams; and 2) the addition of options provides better accessibility and convenience for those required to comply.
Require certified pharmacy technicians to maintain their national certification.	The Board received comments on both sides of this issue. Some felt the national certification would require pharmacy technician to maintain a higher level of expertise, while others felt the additional cost of renewing a certification did not ensure competency. The Board agreed with the latter. Continuing education is a component of maintaining the national certification and the Board does not have the authority to require CE for pharmacy technicians, this alternative was seen as practical.

**E. Determine that the rule does not require those to whom it applies to take an action that violates requirements of another federal or state law.**

The rule does not require those to whom it applies to take an action that violates requirements of federal or state law.

**F. Determine that the rule does not impose more stringent performance requirements on private entities than on public entities unless required to do so by federal or state law.**

The rule does not impose more stringent performance requirements on private entities than on public entities.

**G. Determine if the rule differs from any federal regulation or statute applicable to the same activity or subject matter and, if so, determine that the difference is justified by an explicit state statute or by substantial evidence that the difference is necessary.**

The rule does not differ from any applicable federal regulation or statute.

**H. Demonstrate that the rule has been coordinated, to the maximum extent practicable, with other federal, state, and local laws applicable to the same activity or subject matter.**

There are no other applicable laws.