



MID-ATLANTIC ASSOCIATION OF
COMMUNITY HEALTH CENTERS

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TO: The Honorable Melony Griffith, Chair
Members, Senate Finance Committee
The Honorable Mary Beth Carozza

FROM: Pamela Metz Kasemeyer
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DATE: March 14, 2023

RE: **OPPOSE UNLESS AMENDED** – Senate Bill 647 – *State Board of Pharmacy – Board Membership and Delegated Pharmacy Acts*

On behalf of the Maryland State Medical Society, the Maryland Chapter of the American Academy of Pediatrics, and the Mid-Atlantic Association of Community Health Centers, we **oppose** Senate Bill 647, **unless the legislation is amended**.

Senate Bill 647 proposes changes to the State Board of Pharmacy and the scope of practice of a pharmacy technician and pharmacy technician trainee. These include altering the membership of the State Board of Pharmacy to include a registered pharmacy technician; authorizing a pharmacist, under certain circumstances, to delegate pharmacy acts to be performed at a remote location to a registered pharmacy technician and registered pharmacy intern; and repeals the prohibition on a registered pharmacy technician to administer the flu vaccine.

The above-named organizations have no position on the provisions that alter the membership of the State Board of Pharmacy. However, they strongly oppose the repeal of the prohibition on pharmacy technicians administering flu vaccines as proposed by the bill. Vaccine administration, including the flu vaccine, requires a higher level of training and education than that of a pharmacy technician, given the potential for an adverse reaction to the vaccine and the need for associated patient communication. The above-named organizations would request the bill be amended to retain the prohibition on pharmacy technicians administering the flu vaccine.

In addition, while these organizations do not object to pharmacy technicians and interns performing data entry at a remote location as the bill allows, this should only be permitted if they have immediate access to a pharmacist and are required to use that access if questions arise. In discussing this legislation, several physicians complained that they had serious delays and difficulty with pharmacy technicians or interns processing prescriptions at remote locations, and asking questions of the physician that were later quickly resolved with the intervention of a pharmacist. Whatever efficiency the pharmacy gains from using pharmacy technicians at a remote location should not be at the expense of the patient in the form of delayed prescriptions. An amendment to this effect should be made.

With the adoption of these two amendments, the opposition to the bill would be removed.