



NATIONAL ASSOCIATION OF
CHAIN DRUG STORES



MARYLAND ASSOCIATION
OF CHAIN DRUG STORES

**NACDS and MACDS Testimony to the Maryland General Assembly Health and
Government Operations Committee**

Wednesday, March 1, 2023

Support HB 693 – Delegated Pharmacy Acts

Chair Pena-Melnyk and members of the Health and Government Operations Committee, thank you for the opportunity to testify in support of HB 693. Delegate Kipke, thank you for sponsoring this bill. HB 698 is critical to patients, pharmacies, and Maryland’s hard-working and dedicated pharmacy technicians, as it would allow these healthcare workers to continue to assist pharmacists with administering vaccines after temporary, COVID-era federal allowances for this expire. The legislation would also allow pharmacy technicians to continue to perform data entry tasks remotely.

From the early days of the pandemic, pharmacy technicians served as frontline responders alongside pharmacists, helping to make it possible for pharmacies to provide needed care to the public – all at a time when many other healthcare providers were not open or had cut down the number of appointment slots for patients seeking care. The COVID-related federal and state flexibilities and waivers for pharmacy technicians bolstered pharmacies’ capacity to serve the public in this way, helping to connect you and your constituents to vaccines, testing and other critical healthcare services.

As you are aware, pharmacies played a central role in public health initiatives to get “shots in arms”, and pharmacy technicians helped to make this possible. With the essential support of pharmacy technicians, pharmacies were able to provide more than 3.6 million COVID vaccines to Marylanders. Notably, an internal survey of NACDS members conducted in March 2022 found that up to 38% of all COVID vaccine doses provided by pharmacies were administered by pharmacy

technicians.ⁱ Remarkably, with the support of the full pharmacy team, pharmacies have provided 2 out of every 3 COVID vaccinations across the country.ⁱⁱ

As trained and experienced vaccinators, pharmacy technicians have a proven record of administering vaccines safely and effectively. In fact, pharmacy technicians who participate in vaccine administration under the federal COVID-era allowances have completed an accredited training program. That program teaches important skills like administration technique and how to handle an emergency reaction to a vaccine. By maintaining requirements for pharmacy technicians to have “appropriate [...] education, training, and experience” when performing “delegated acts” such as administering immunizations under a pharmacist’s supervision, this bill will continue that level of training and skill.

It is also important to account for the time and personal sacrifice that Maryland’s pharmacy technicians took to serve the state during the pandemic by completing an accredited vaccine training program and then jumping into the vaccinator workforce. If we do not pass this bill, they will no longer be able put these skills to use. That would not only be a disservice to Maryland’s technician workforce, but a disservice to patients who now expect to receive the level of vaccine services at local pharmacies that were made possible in part by the contributions of pharmacy technicians.

Additionally, pharmacists appreciate the option of being able to delegate the task of vaccine administration to a pharmacy technician. One study found that community pharmacists who supervise pharmacy technicians trained to administer immunizations were receptive to technicians taking on this new role, and that utilizing technicians in this way positively affects the morale of the pharmacy team, while helping to increase the number of vaccinations given by the pharmacy.ⁱⁱⁱ

The other portion of the bill allows pharmacy technicians to continue to perform remote data entry – a COVID-related state allowance that made it possible for pharmacies to meet patient demand. The ability for pharmacy technicians to perform remote data entry gave pharmacies the flexibility to shift data entry work offsite when needed, freeing up onsite pharmacy staff to focus on activities that can only be completed in-person. Many states already allowed this prior to the pandemic because it helps improve efficiency to better serve patients, and provides technicians an environment more conducive to the tasks.

Rolling back allowances for pharmacy technicians to administer vaccines and for remote data entry would strip away the professional advancement that pharmacy technicians have experienced in recent years. Such a setback would be hard felt by these frontline healthcare workers and could discourage individuals from pharmacy technician careers into the future. HB 693 will help to ensure this does not happen.

In conclusion, your constituents have come to rely on and expect a greater level of access to care at neighborhood pharmacies. A poll commissioned by NACDS and conducted by Morning Consult December 7-12, 2022, found that 69% of Maryland adults believe “learning the lessons of the pandemic means keeping in place policies that make it easier for patients to access services from pharmacists and other pharmacy team members.” We urge Maryland lawmakers to do just that – learn from the lessons of the pandemic and maintain the policies for pharmacy technicians that have allowed pharmacies the capacity to continue to deliver patient care services in your communities.

Please support HB 693.

ⁱ NACDS conducted a survey of their chain pharmacy membership via an established workgroup in late March 2022. The workgroup is comprised of more than 60 individuals representing about 30 chain pharmacy organizations. The purpose of the

survey was to begin estimating pharmacies' impact in responding to the COVID-19 pandemic in topic areas where data was not readily available. The survey response rate was 40%.

ii <https://www.cdc.gov/vaccines/covid-19/retail-pharmacy-program/index.html>

iii <https://pubmed.ncbi.nlm.nih.gov/31036525/>