



May 19, 2023

[submitted electronically via: kgandhi@azpharmacy.gov]

Kamlesh Gandhi
Executive Director
Arizona Board of Pharmacy
1110 W. Washington St., Suite 260
Phoenix, AZ 85007

Re: Pharmacy Technicians

Dear Director Gandhi,

The Arizona Pharmacy Association (AzPA) and the American Pharmacists Association (APhA) appreciate the opportunity to provide our support for the proposed rules, R4-23-1104 and R4-23-1106, filed by the Arizona Board of Pharmacy (BOP) regarding pharmacy technician-administered immunizations.

APhA is the largest association of pharmacists in the United States advancing the entire pharmacy profession. APhA represents pharmacists in all practice settings, including community pharmacies, hospitals, long-term care facilities, specialty pharmacies, community health centers, physician offices, ambulatory clinics, managed care organizations, hospice settings, and government facilities. Our members strive to improve medication use, advance patient care, and enhance public health. In Arizona, with 7,730 licensed pharmacists and 11,540 pharmacy technicians, APhA represents pharmacists, students, and pharmacy technicians that practice in numerous settings and provide care to many of your constituents. As the voice of pharmacy, APhA leads the profession and equips members for their role as the medication expert in team-based, patient-centered care. APhA inspires, innovates, and creates opportunities for members and pharmacists worldwide to optimize medication use and health for all.

The Mission of AzPA is to serve and represent all pharmacy professionals by fostering safe and effective medication therapy, promoting innovative practice, and empowering its members to serve the healthcare needs of the public.

Arizona pharmacy technicians have been administering vaccines under the supervision of pharmacists since October 2020, when the U.S. Department of Health and Human Services (HHS) issued guidance related to the Declaration under the Public Readiness and Emergency Preparedness (PREP) Act for Medical Countermeasures Against COVID-19. HHS' guidance authorized pharmacy technicians, acting under the supervision of a pharmacist, to administer FDA-authorized or FDA-licensed COVID-19 vaccines to persons ages three or older and to administer FDA-authorized or FDA-licensed ACIP-recommended vaccines to persons ages three through 18 according to the Advisory Committee on Immunization Practices' (ACIP) standard

immunization schedule.¹ In August 2021, HHS' temporary authority was expanded to authorize pharmacy technicians to administer seasonal influenza vaccines, under the supervision of a pharmacist, to persons ages 19 and older, consistent with ACIP recommendations.² As beneficial as HHS' temporary federal authority has been in expanding access to care and relieving some of the burdens on an overstressed healthcare system, this authority is set to expire by December 2024 without further federal or state clarification. R4-23-1104 and R4-23-1106 make a portion of this temporary federal authority permanent under pharmacy technician state scope of practice to minimize interruptions to patient access to vaccines and ensure Arizona can meet its public health care and infrastructure needs.

Thank you again for the opportunity to submit support for R4-23-1104 and R4-23-1106. These rules are essential to ensure optimized access to immunizations for Arizonans. If you have any questions or require additional information, please do not hesitate to contact Kelly Fine, RPh, FAzPA Chief Executive Officer, by email at kelly@azpharmacy.org and E. Michael Murphy, PharmD, MBA, APhA Advisor for State Government Affairs, by email at mmurphy@aphanet.org.

Sincerely,

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Arizona Pharmacy Association
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¹ Guidance for PREP Act Coverage for Qualified Pharmacy Technicians and State-Authorized Pharmacy Interns for Childhood Vaccines, COVID-19 Vaccines, and COVID-19 Testing (October 20, 2020), <https://www.hhs.gov/sites/default/files/prep-act-guidance.pdf>

² Eighth Amendment to Declaration Under the PREP Act for Medical Countermeasures Against COVID-19 (August 4, 2021), <https://www.govinfo.gov/content/pkg/FR-2021-08-04/pdf/2021-16681.pdf>