



October 19, 2020

Debbie Veale, R.Ph.  
Chair, Licensing Committee  
California Board of Pharmacy  
2720 Gateway Oaks Dr, Ste. 100  
Sacramento, CA 95833

**RE: Comments on Agenda Item VII**

Dear Ms. Veale,

The California Pharmacists' Association (CPhA) is writing to you today to provide comments on Agenda Item VI of the Licensing Committee's report on October 20, 2020 relating to the expansion of authority for pharmacy technicians to allow them to administer influenza vaccinations.

CPhA recently adopted new policy at our last House of Delegates meeting on September 13, 2020 regarding Pharmacy Technicians. Our recently adopted policy states:

*The California Pharmacists Association supports the education and training of Pharmacy Technicians to administer vaccines.*

*The California Pharmacists Association supports appropriately trained Pharmacy Technicians to administer vaccines under the direction and supervision of a pharmacist.*


CPhA is supportive in concept of the Board's desire to discuss a possible expansion of duties for pharmacy technicians to administer influenza vaccines. However, CPhA's primary concern is patient safety. CPhA believes that any conversation about this expansion of duties must include the following requirements of technicians:

- Technicians must be certified in basic life support.
- Technicians must complete an immunization training program endorsed by the CDC or the Accreditation Council for Pharmacy Education that, at a minimum, includes hands-on injection technique, and the recognition and treatment of emergency reactions to vaccines.
- Technicians must comply with all state and federal recordkeeping and reporting requirements, including providing documentation to the patient's primary care provider and entering information in the appropriate immunization registry designated by the immunization branch of the State Department of Public Health.
- Technicians should be required to complete one hour of ongoing Continuing Education focused on immunizations from an approved provider of continuing education every two years.

Lastly, as pharmacists bear the responsibility of duties performed by technicians whom they supervise, we believe it is appropriate that the Board language clearly reflect that the supervising pharmacist has the sole authority to allow technicians to perform these duties.

CPhA appreciates the opportunity to work with the Board on this proposal. Should you have any questions about these comments, please don't hesitate to contact me at [dmartinez@cpha.com](mailto:dmartinez@cpha.com) or at (916) 779-4519. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Martinez', with a stylized flourish at the end.

Danny Martinez  
Director, Regulatory Affairs and Policy Development  
California Pharmacists Association