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Submitted via electronic mail to Anne.Sodergren@pharmacy.ca.gov

Subject: AB 1503 - New Section 4001.5, Recommendations for Pharmacy Technician Advisory Committee Member Qualifications

Dear Licensing Committee Members and Vice-Chairpersons,

On behalf of the California Society of Health-System Pharmacists (CSHP), representing thousands of California pharmacists and pharmacy technicians across the state, we thank the Board for the opportunity to provide recommendations for the selection criteria for pharmacy technician members of the newly established Pharmacy Technician Advisory Committee.

CSHP strongly supports the creation of this advisory body to ensure that regulatory and policy decisions concerning pharmacy technicians reflect the realities and evolving responsibilities of technician practice across all care settings—community, health-system, ambulatory, long term care, and specialty pharmacy.

Pharmacy technicians are indispensable members of the healthcare team. Their scope of practice in California continues to expand, encompassing both technical and patient-facing responsibilities that directly affect medication safety, access, and the quality of pharmacy services. Therefore, it is critical that members appointed to this Advisory Committee bring current, hands-on practice experience that reflects the full scope of practice.

CSHP supports the Board of Pharmacy's preliminary recommendation the advisory committee members are in good standing with the Board and actively engaged in practice of pharmacy.

To ensure the Advisory Committee provides well-informed recommendations to support the current and evolving needs of the health care system, CSHP recommends the following qualifications for pharmacy technician appointments:

1. Active licensure and standing
 - Must hold an active California pharmacy technician license in good standing.
 - Must have no pending or prior disciplinary actions within the past five years.
2. Practice experience
 - Minimum of ten (10) years of cumulative pharmacy technician experience, with at least five (5) years in the current or most recent practice setting.
 - Must be actively employed or recently engaged in practice (within 12 months) in a community, health-system, or related pharmacy setting.
3. Representation of practice diversity. Collectively, the four pharmacy technician members should represent a diverse range of practice environments, such as:
 - Community/Retail Pharmacy
 - Hospital or Health-System Pharmacy
 - Specialty Pharmacy
 - Compounding
 - Ambulatory Care
 - Clinics (e.g. Outpatient, Federally Qualified Healthcare Centers)
 - Managed Care, Correctional Health, or 340B Programs
 - Long Term Care (e.g., skilled nursing homes, residential care facilities for the elderly)
4. Demonstrated competence in core and expanded technician functions.
Appointees should have direct, verifiable experience performing or overseeing key technician functions that reflect the breadth of current and emerging practice, including:
 - Administration of Vaccines: Experience supporting or administering vaccines under pharmacist supervision awareness of patient-facing responsibilities, public health protocols, and immunization documentation requirements.
 - Medication History Collection: Experience obtaining and documenting complete and accurate medication histories, reconciling patient-reported and institutional records, and supporting medication reconciliation to improve patient safety and care continuity.
 - Automated Medication Delivery Systems: Experience operating, maintaining, or auditing automated dispensing cabinets and robotic systems and regulatory compliance.
 - 340B Drug Pricing Programs: Familiarity with 340B compliance, inventory segregation, auditing procedures and regulatory accountability.
 - Medication Distribution and Accountability: Demonstrated experience in managing controlled substance inventories, reconciliation, and legal compliance with record keeping and notification requirements.

- Medication Recalls and Returns: Experience with product recall management, familiarity with chain-of-custody, documentation, and manufacturer/vendor coordination requirements.
- Medication Storage and Inspection Requirements: Knowledge of environmental controls, expiration dating, labeling, inspection standards, and compliance with federal and state requirements.
- Drug Supply Chain Security Act (DSCSA) Compliance: Understanding of and adherence to the DSCSA, including requirements for product tracing, verification, and handling of suspect and illegitimate products.
- Sterile Compounding Requirements: Demonstrated knowledge and expertise in compounding techniques in compliance with state and federal requirements and standards of practice
- Leadership Skills: Experience with supervision of other pharmacy technicians in a pharmacy practice setting.

5. Professional development and education

- Evidence of ongoing professional development through advanced certification (e.g., PTCB Advanced Pharmacy Technician, sterile compounding certification) or professional association engagement.
- Demonstrated participation in technician leadership or education initiatives.

6. Knowledge of regulatory and practice standards

- Familiarity with California pharmacy law and technician scope of practice
- Ability to provide informed input on evolving technician responsibilities, including new technologies and clinical service models.

7. Professional conduct and collaboration

- Demonstrated record of professionalism, ethical practice, and effective interdisciplinary collaboration.
- Ability to represent the technician profession with integrity and objectivity in a public advisory role.

Recommended Appointment Process and Term

- Application Process: CSHP supports the Board's plan to create an online application portal allowing candidates to submit licensure verification, resume, and a statement of qualifications outlining relevant experience. CSHP suggests the application process encourages submission of letters of recommendations that address the qualifications noted above.
- The term of appointment is unclear. CSHP requests the Board consider similar term length and limits as is done with the Board members.
- All potential appointees should disclose financial, organizational, or employment relationships that could present conflicts of interest.

CSHP commends the California Board of Pharmacy for establishing the Pharmacy Technician Advisory Committee and recognizes its importance in shaping the future of technician practice in California. The inclusion of pharmacy technicians with current, comprehensive, and diverse practice experience—spanning patient care, automation, compliance, and medication safety—is essential to ensuring that the Committee’s recommendations are both practical and forward-looking.

CSHP stands ready to collaborate with the Board to promote excellence in technician practice and to advance the safe and effective delivery of pharmacy services to all Californians.

Sincerely,



Loriann De Martini, PharmD, MPH, BCGP
Chief Executive Officer
California Society of Health System Pharmacists