September 10, 2020

Colorado State Board of Pharmacy

Attention: Dmitry Kunin, PharmD Executive Director

1560 Broadway Denver, CO 80202

Email: Dmitry.kunin@state.co.us

RE: Technician Immunization Administration and proposed amendments 3 CCR 719-1-19.00.00

Dear Executive Director Kunin,

I am writing on behalf of [*The Coalition for the Advancement of Pharmacy Technician Practice*](https://info.nhanow.com/pt-coalition), and we would like to thank the Board for your work during these unprecedented times and for your commitment to ensure the safety of the public. *The Coalition* represents the voice of pharmacy technicians across the state of Colorado and within various practice settings and was developed with a focus of bringing pharmacy technician organizations and associations together to support the efforts of advancing pharmacy technicians, during the current health crisis and beyond. *The Coalition*’s mission is to advocate to expand technicians’ scope of practice and for the value that technicians demonstrate as they assist and serve patients’ needs during this health emergency.

*The Coalition* would officially like to request that the Colorado Board of Pharmacy discuss the delegation of immunization administration to trained pharmacy technicians and to potentially amend 3 CCR 719-1-19.00.00. As mentioned above, *The Coalition* is in support of the expansion of technician roles to allow delegation of immunization administration, and other expanded duties to trained Pharmacy Technicians.

It is expected that this flu and cold season to be far more challenging than any other year considering the added complications of COVID-19. Recent forecast polling shows a significant increase in the percentage of adults interested and planning to receive an influenza vaccine for the 2020-2021 season. CDC guidance reflects influenza vaccination being paramount to reducing the impact of respiratory illnesses in the population and resulting burdens on the healthcare system during the COVID-19 pandemic.

Pharmacies will be a critical public health asset to the likely Fall 2020 annual influenza and COVID-19 resurgence. Pharmacy-based immunizations have been one of the most significant

public health achievements in recent years. Patients have demonstrated high acceptance of pharmacy-based immunizations, with 97% of vaccinated patients surveyed reporting satisfaction with their experience in the pharmacy. About one in three adults who received the influenza vaccine in recent years did so at their community pharmacy. (1)

In order to meet the increased national vaccination demand to protect the public against vaccine preventable disease, we will need to have all capable people available to administer. The pharmacist has maintained the professional discretionary tasks associated with immunizations such as clinical evaluation of a patient requesting an immunization, vaccine selection, and patient counseling, in states that allow technicians to administer immunizations. (2) In these states, technicians receive training on the technical aspects of immunization administration, including appropriate technique, handling an emergency, and CPR certification. Following this model, multiple retail pharmacies have led the way in proving technicians can safely administer immunizations to patients under the direction of a pharmacist. Technicians have successfully taken the administrative burden off the pharmacist by preparing and administering the immunization. This has allowed pharmacists to free up much needed time to review patient histories, and handle patient interactions that require professional judgement. (3)

*The Coalition* respectfully requests that the Board consider amendments to 3 CCR 719-1-19.00.00 to include pharmacy technicians where applicable.

We appreciate your time and consideration on this topic. If you have any questions related to *The Coalition* please reach out via our [website](http://www.pharmtechcoalition.com) or directly to myself at 913-424-2907 or Jessica.Langley@nhanow.com.

Sincerely,

Jessica Langley-Loep, MS

Executive Director of Education & Advocacy - NHA

Representative for *The Coalition for the Advancement of Pharmacy Technician Practice*

References:

1. Dylan Atkinson, Alex Adams, and David Bright. "Should pharmacy technicians administer immunizations?" INNOVATIONS in pharmacy 8.3 (2017): 16-16.
2. Idaho, Utah, Rhode Island
3. 3 - In 2016, Idaho was the first state to authorize technicians to administer vaccines under the direction of the pharmacist. Albertsons Companies was the first company to pilot this new task for technicians and now successfully allows technicians to immunize where allowed by state law. In addition to Idaho, the following states have a pathway for technicians to administer vaccines: Rhode Island, Utah, Illinois, and Washington. Over the last four years this has proven to be a valuable and efficient way to both remove barriers to pharmacists practicing at the top of their license, but also expanding access to important vaccines against preventable diseases.