

September 14, 2022

Ron Briel Program Manager Licensure Unit
DHHS Licensure Unit
Attn: Credentialing Review Committee for Pharmacy Technicians
PO Box 94986
Lincoln NE 68509-4986

Dear Mr. Briel,

This letter is to voice my support of pharmacy technicians continuing to administer vaccinations.

As a pharmacist in a rural part of Nebraska, I recognize that more healthcare personnel qualified to administer vaccine doses are needed. This need has never been bigger than during the recent COVID-19 pandemic. With the need for ongoing booster doses of COVID-19 vaccine and a renewed push to increase influenza vaccinations and vaccinations overall, this need for qualified healthcare personnel will continue.

Through the Public Readiness and Emergency Preparedness (PREP) Act Declaration, the federal government provided a pathway for states to rapidly expand and support their vaccination workforces – including pharmacy technicians.

The PREP Act currently allows a pharmacy technician acting under the supervision of a qualified 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 U.S. Advisory Committee on Immunization Practices (ACIP)-recommended vaccines to persons ages three through 18 years of age according to ACIP's standard immunization schedule. Such qualified pharmacy technicians currently qualify as "covered persons" under the PREP Act receiving immunity under the PREP Act with respect to all claims for loss caused by, arising out of, relating to, or resulting from, the administration or use of such vaccines. 42 U.S.C. § 247d-6d(a)(1). The provisions of the PREP Act, however, will end on October 1, 2024, or when an end to the Declaration of Emergency is issued.

In Nebraska, pharmacy technicians are required to be registered with the Department of Health and Human Services prior to employment and must become certified within one year by a national certifying body or a state program which is approved by the Board of Pharmacy.

Nebraska should continue to allow a certified pharmacy technician, supervised by a pharmacist, to administer vaccinations. Prior to administration by a pharmacy technician, these vaccinations are reviewed and verified by a pharmacist. A pharmacy technician would be limited to

administering vaccinations to patients who are three of age and older, and only in the deltoid muscle of the arm. Nebraska should mirror the current PREP Act authorities which requires the pharmacy technician to hold a current certificate in basic life support, be certified and trained to administer vaccinations, and their supervising pharmacist must be on-site.

I cannot underestimate what impact pharmacists, with the assistance of qualified pharmacy technicians, have had on the vaccination rate for Nebraskans. In the last last 18 months, we have provided several thousand vaccinations at our pharmacy and at locations in 5 counties such as nursing homes, assisted livings, senior living apartments, schools, senior centers and in homes. Having these certified technicians in the pharmacy to provide vaccinations has freed up our pharmacists to take vaccinations to these alternate locations in our large service area. Without these technicians, we would have mightily struggled to meet the needs of our patients.

If you have any questions, please contact me at 308-697-3400 or marksrx@swnebr.net.

Warmest regards,

Mark McCurdy, RP
RP In Charge
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