



August 11, 2022

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

Dear Mr. Briel:

On behalf of Albertsons Companies, Inc. ("ACI"), I am writing in support of the Nebraska Pharmacists Association's credentialing review of the Nebraska statutes relating to pharmacy technicians administering immunizations. ACI is a leading food and drug retailer that operates stores across 34 states and the District of Columbia with more than 20 well-known banners including Albertson's, Safeway, Vons, Jewel-Osco, Shaw's, Acme, Tom Thumb, Randalls, United Supermarkets, Pavilions, Star Market, Haggen, Carrs, Kings Food Markets, and Balducci's Food Lovers Market. ACI also operates more than 1,720 community pharmacies nationwide with 5 located in Nebraska operating under the Safeway banner.

Under the current Federal PREP Act implemented during the COVID-19 pandemic, pharmacy technicians can administer vaccines under the supervision of a trained pharmacist. Unless the statutes are amended to allow pharmacist technicians the permanent ability to immunize, we risk undermining the success we have seen with technician immunization over the last two years when the PREP Act is terminated based on the Federal Public Health Emergency expiring, the federal pharmacy partnership terminating, or reaching October 1, 2024; whichever is soonest.

ACI has allowed pharmacy technicians to immunize since 2016 when the practice was first started in the state of Idaho. Our experience with training technicians to assist the pharmacist in this manner has paid dividends as more states have adopted this authorization permanently and as all states have allowed the practice during the COVID-19 pandemic under the Federal PREP Act.

We learned early on in Idaho in 2016 that pharmacists having the ability to delegate administration to a technician allowed them to focus on more urgent tasks. I was a practicing pharmacist in Idaho during this time and I often had the luxury to decide whether I should have my technician administer an immunization to allow me to focus on a more urgent patient need requiring my attention. In other cases, I chose to administer the vaccine because I needed my technician to prepare a prescription urgently for my review. Importantly, based on the action taken in Idaho to proactively allow this, I was able to make those decisions that made a huge difference in my practice. Pharmacists in Idaho at the time were also able to spend more time evaluating patient needs or providing patient care services that require professional judgement such as counseling a patient on the safe use of their medication.



Additionally, due to our familiarity with training technicians and having infrastructure in place for training technicians, we were able to adopt the program and roll it out very quickly across the country as soon as the PREP Act was enacted to support the incredible influx of patients needing a COVID-19 vaccine. Prior to and under the Federal PREP Act, we implemented an immunization training program provided by a program operator who is approved by the Accreditation Council for Pharmacy Education (ACPE). Training programs operated by accredited providers feature hands-on injection technique, clinical evaluation of indications and contraindications of vaccines, and the recognition and treatment of emergency reactions to vaccines. Our training has fostered a strong foundation for our technicians to be trained and confident to administer immunizations under the supervision of a pharmacist. The training has also given our pharmacists the confidence to delegate the administration of immunizations to their well-trained pharmacy technicians.

Pharmacies are one of the most accessible healthcare entities in the community due to their proximity to where people live and the extended hours of operation on weekends and in the evening. When the country was faced with the immeasurable task of distributing and administering the COVID-19 vaccine, pharmacy was instrumental in completing that monumental task. Over time, pharmacy began to play an outsized role in administering the vaccines and the ability to delegate administration to a well-trained pharmacy technician helped ensure this service was provided in a safe and effective manner to the public, while continuing to meet the additional pharmacy needs of our patients. We don't expect to see the influx of immunizations to return to pre-COVID baseline levels and expect the need to delegate to a pharmacy technician to persist. For these reasons pharmacy technicians and pharmacists are protecting public safety by filling important gaps in access to lifesaving immunizations. If not for weekends and evenings, many individuals would have had a difficult time receiving their COVID-19 immunizations.

ACI recognizes the value well-trained pharmacy technicians can provide in a pharmacy and look forward to their ability to assist with workflow and off-site vaccination clinics on a permanent basis. This relief allows pharmacists to leverage their professional training to provide direct patient care, such as evaluating patient needs and offering services such as medication therapy management or advanced counseling services. ACI believes these changes and supporting the pharmacist will improve access to care and benefit efforts to improve health equity.

If you have any questions, please reach out to me at 208-513-3470 or Rob.Geddes@Albertsons.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rob Geddes".

Rob Geddes, PharmD
Director, Pharmacy Legislative and Regulatory Affairs