

August 17, 2022

Ron Briel  
Program Manager, Licensure Unit  
Nebraska Department of Health and Human Services  
Attn: Credentialing Review  
301 Centennial Mall South  
Lincoln, NE 68509

Dear Mr. Briel:

We thank you for the opportunity to submit a letter of support for the Nebraska Pharmacists Association's (NPA) application to the Nebraska Credential Review Program for pharmacy technicians to administer vaccinations.

With over 2,500 pharmacists practicing within Nebraska, approval of this review will allow pharmacists, pharmacy personnel, and pharmacies to meet the demand for health care services and continue to be a gateway for patients to access quality care. Nebraska pharmacy technicians have been administering vaccines under the supervision of pharmacists since October 2020, when the U.S. Department of Health and Human Services (HHS) issued guidance related to the HHS Declaration Under the Public Readiness and Emergency Preparedness (PREP) Act for Medical Countermeasures Against COVID-19. This federal guidance authorized qualified pharmacy technicians, acting under the supervision of a qualified pharmacist, to administer Food and Drug Administration (FDA)-authorized or FDA-licensed COVID-19 vaccines to persons ages three or older and to administer FDA-authorized or FDA-licensed ACIP-recommended vaccines to persons ages three through 18 according to Advisory Committee on Immunization Practice's (ACIP's) standard immunization schedule.<sup>1</sup> In August 2021, this temporary federal authority was expanded to authorize qualified pharmacy technicians to administer seasonal influenza vaccines, under the supervision of a qualified pharmacist, to persons ages 19 and older consistent with ACIP recommendations.<sup>2</sup> As beneficial as this temporary federal authority has been in expanding access to care and relieving some of the burden on an overstressed healthcare system, it is set to expire in 2024. Approval of NPA's application will make this temporary federal authority permanent under state scope of practice, and it expands the authority to cover adult immunizations beyond influenza and COVID-19 as well.

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<sup>1</sup>Guidance for PREP Act Coverage for Qualified Pharmacy Technicians and State-Authorized Pharmacy Interns for Childhood Vaccines, COVID-19 Vaccines, and COVID-19 Testing (October 20, 2020), <https://www.hhs.gov/sites/default/files/prep-act-guidance.pdf>

<sup>2</sup>Eighth Amendment to Declaration Under the PREP Act for Medical Countermeasures Against COVID-19 (August 4, 2021), <https://www.govinfo.gov/content/pkg/FR-2021-08-04/pdf/2021-16681.pdf>

Over 90% of Americans live within five miles of a community pharmacy,<sup>3</sup> and more than any other segment of the pharmacy industry, independent community pharmacies are often located in underserved rural and urban areas. These pharmacies are frequently the most accessible healthcare providers in many Nebraska communities and are vital in the provision of immunizations, testing, and other services.

NCPA strongly supports the Nebraska Pharmacists Association in their advocacy for pharmacy technicians to vaccinate individuals under a licensed pharmacist's supervision. Approval of this application will expand access to vaccines to all Nebraskans and promote better care and health outcomes to patients across the state.

Sincerely,



Belawoe Akwakoku  
State Government Affairs Manager  
National Community Pharmacists Association

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<sup>3</sup>NCPDP Pharmacy File, ArcGIS Census Tract File, NACDS Economics Department.