

July 6, 2020

Elena M. Kemp
Regulatory Coordinator
Department of Regulatory Agencies
State Board of Pharmacy
1560 Broadway, Room 110D
Denver, CO 80202

RE: PHARMACY RULES AND REGULATIONS

Dear Coordinator Kemp,

The National Community Pharmacists Association (NCPA) is writing you today in support of rule – **1.00.25** and **21.21.40**. Rule 1.00.25 will authorize Colorado pharmacists to order and administer COVID-19 tests that have received emergency use authorization (EUA) from the Food and Drug Administration (FDA), or equivalent regulatory authorization. It will also help with efforts to curb the spread of the 2019 novel coronavirus diseases by positively impacting patient access to testing. Rule 21.21.40 will positively impact patient access to medically necessary compounded medications. NCPA applauds the Board of Pharmacy's (BOP) efforts to adopt these rules while protecting the health, safety, and welfare of Colorado's residents. The recommendations below will expand access to testing and pharmacy provided services without sacrificing patient safety.

NCPA represents the interest of America's community pharmacists, including the owners of more than 21,000 independent community pharmacies across the United States and 125 independent community pharmacies in Colorado that employ about 1487 full-time employees who filled over 7.8 million prescriptions last year. Our members are small business owners who are among America's most accessible health care providers in many communities and are critical for the expansion of testing and eventually to furnish a COVID-19 vaccine to Colorado residents once available.

Pharmacy Intern and Certified Technician Participation

Rule 1.00.25 does not allow the pharmacist to delegate to pharmacy interns or certified pharmacy technicians any of the activities involved in testing. NCPA asks that the BOP allow the pharmacist in charge to utilize their highly trained pharmacy interns and certified technicians in COVID-19 testing to increase testing capacity while managing the pharmacy's daily workflow to serve all patients well. Much like the pharmacist's scope of practice, pharmacy intern and certified technician roles have advanced from pill counting to remote data entry, taking medical histories, vaccine administration, and administering pharmacist-authorized tests. In a number of states, including Ohio¹ and Vermont², pharmacy interns and certified pharmacy technicians are authorized to administer COVID-19 tests under pharmacist supervision.

¹[Expansion Pharmacist, Pharmacy Intern, and Certified Pharmacy Technician Testing Authority During COVID-19](#)

²[Pharmacy Ordering and Administration of Testing for COVID-19 in Vermont](#)

Rule 19.01.20 prohibits the pharmacist from delegating the administration of vaccines and immunization to a trained certified technician. NCPA recommends that the BOP include pharmacy interns and certified technicians, authorizing them to be involved in the testing processes, including administering tests, and administration of vaccines by certified technicians, when available, under the direct supervision of the pharmacist. In the current COVID-19 climate and moving forward, expanding the technician's role would free up the pharmacist's time for clinical services that better serve Colorado residents. Considerations may include authority to administer vaccines, run point-of-care tests (POCT), and at best, permitting functions under the direct supervision of the pharmacist that do not require the pharmacist's professional judgment.

Pharmacist Vaccine Qualifications

NCPA recognizes the temporary suspension of required qualifications for pharmacist administering vaccines and immunizations.³ This rule suspension will help maintain and increase vaccine and immunization rates during the public health emergency (PHE). Upon an end of the PHE, NCPA encourages the BOP to maintain those qualifications and promulgate rules where appropriate, to authorize pharmacists to administer any FDA-approved vaccines recommended by the Advisory Committee on Immunization Practices (ACIP).

Storage and Beyond-Use Dating

NCPA supports the proposed BUD extensions for low risk compounded sterile products at room and refrigerated temperature respectively. While maintaining safety and efficacy, the flexible BUD proposals will positively impact patient access to medically necessary compounded medications by permitting pharmacists to assign or extend BUDs.

Conclusion

NCPA appreciates the opportunity to provide comments in support of rule 1.00.25, which will increase patient access to COVID-19 testing by authorizing Colorado pharmacists to order and administer COVID-19 tests. Frontline independent community pharmacists continue to help in their authorized capacity, and they remain well-positioned to play an essential role to expand testing statewide and provide mass vaccination once a vaccine is available. Thank you for your time and consideration, please do not hesitate to contact me at ademola.are@ncpa.org should you have any questions.

Sincerely,



Ademola Are
Manager, State Government Affairs
National Community Pharmacists Association

³[Pharmacists Guide to Re-Entering Workforce](#)