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July 27, 2017

Re: 15 CSR 7 Comments

The Board received comments on 15 CSR 7 from Cabell Huntington Hospital and the West Virginia Hospital Association. The Board accepted all recommended changes.

Sincerely,

Ryan L. Hatfield
General Counsel

June 27, 2018

West Virginia Board of Pharmacy
2310 Kanawha Blvd. East
Charleston, WV 25311

Attn: Ryan Hatfield
Ryan.l.hatfield@wv.gov

Dear Mr. Hatfield:

Thank you for the opportunity to comment on rules pertaining to the pharmacy profession. Enclosed you will find comments to the proposed Board of Pharmacy Rules for Registration of Pharmacy Technicians, W.Va. Code 30-5-7 and 30-5-11a.

Section 3.1.b.1.C. "Obtained a national certification as a pharmacy technician and have practiced in another jurisdiction for a period of time as determined by the board; and"

Concern/Comment: What would be considered a "period of time?" Would this be decided individually per applicant? This could be cause for concern when hiring an individual not knowing if the board would approve their "period of time" of previous employment.

Suggestion: "Obtained a national certification as a pharmacy technician and have practiced in another jurisdiction for a period of at least two years of continuous, full-time employment as determined by the board; and"

Section 3.1.c. "If the individual is seeking registration pursuant to 3.1.b.1C. then the individual must provide satisfactory proof to the Board of his or her licensure status with the board of pharmacy in the state in which the individual is licensed."

Concern/Comment: There are states that do not require licensing to be a pharmacy technician (Pennsylvania), therefore they would not be able to supply proof of licensure status via another state Board.

Suggestion: Allow for a notarized document of proof of satisfactory employment by previous employer.

Other comments pertaining to pharmacy tech rules section:

I am most appreciative of the efforts made by the staff and the Board of Pharmacy to develop rules and regulations that better reflect today's industry standards. As the Board proceeds in these efforts, I would like to note that there is a difference in how a retail pharmacy and an institutional pharmacy, like Cabell Huntington Hospital Pharmacy, not only operates but recruits, hires and trains their pharmacy staff. It would be beneficial to see that distinction within the code and rules to better serve our patients. I look forward to continued conversation regarding this effort.

Please contact me for further information or questions pertaining to our concerns and suggestions at 304-526-2102 or via email at sherri.morgan@chhi.org

Respectfully submitted,

Sherri Morgan, RPh, MHA
Cabell Huntington Hospital
Director of Pharmacy Services



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July 13, 2018

Ryan Hatfield
General Counsel
2310 Kanawha Blvd. East
Charleston, WV 25311

Dear Mr. Hatfield:

Re: LEGISLATIVE RULE 15CSR7, BOARD OF PHARMACY RULES FOR REGISTRATION OF PHARMACY TECHNICIANS

On behalf of the West Virginia Hospital Association and its 65 member hospitals and health systems, we respectfully submit this letter to provide public comments in response to the above referenced **Legislative Rule 15CSR7, Board of Pharmacy Rules for Registration of Pharmacy Technicians**.

§15-7-3. Qualifications For Registration as a Pharmacy Technician; 20 Hour Training Program.

3.1.b.1.B.- We recommend adding the word "or" after the stricken "and" to restore the current requirements.

3.1.b.1.C.- We recommend replacing the words "a period of time as determined by the board" with "at least one year". Leaving this language unchanged would create uncertainty for our members during the hiring process because the hiring entity would not know if the applicants experience meets the "period of time" requirements. In addition, changing this language to "at least one year" would be consistent with the current practice of the board as found on the current pharmacy technician application on the board's website.

3.1.c.- We recommend adding language to this subdivision to allow for an applicant under this provision who has practiced in a state that does not require licensure. As drafted, an applicant coming to West Virginia from a state that does not license pharmacy technicians would not be able to meet these requirements. Our suggestion would be to allow for a notarized letter evidencing satisfactory employment by a previous employer.

If you have any questions or concerns, please contact me at (304) 353-9720.

Sincerely,

Brandon Hatfield
General Counsel

