

NATIONAL ASSOCIATION OF NUCLEAR PHARMACIES



September 12, 2003

The American Council on Pharmaceutical Education
20 North Clark Street, Suite 2500
Chicago, IL 60602-5109

RE: Invitation to Comment: Education and Training of Pharmacy Technicians

This letter is written on behalf of the National Association of Nuclear Pharmacies ("NANP") to respond to ACPE's request for comment on Education and Training for Nuclear Pharmacies Technicians. NANP is a non-profit trade association of over one hundred nuclear pharmacies, and comprises virtually all of the pharmacies that prepare and distribute nuclear pharmaceuticals in the United States. In addition, the major manufacturers of nuclear pharmaceuticals are also members of NANP, and therefore NANP represents both pharmacy interests and manufacturing interest in the nuclear pharmaceutical market

While we understand the necessity of assuring minimum levels of competence within this large workforce, consideration of the diversity within specialty areas of practice is critical. A "one size fits all" approach to technician training or mandated requirement for PCTB certification will not meet the needs of the entire technician workforce, nor will it assure competency.

The following information is provided for background in support of our position:

Recognizing the need for specialized training, the APhA Section on Nuclear Pharmacy proactively developed a set of Nuclear Pharmacy Technician Training Program Guidelines. (hereafter called the "NPT Guidelines") In November 2000, the APhA Board of Trustees endorsed these NPT Guidelines, which follow the AHSP TAB on Outcome Competencies and Training Guidelines for Pharmacy Technicians. This endorsement provides the acknowledgement that nuclear pharmacy technicians have separate and distinct training needs that are different from those personnel practicing in more traditional settings. The NPT Guidelines detail specific outcomes and competencies for nuclear pharmacy technicians that parallel those from the ASHP TAB. There are nuclear pharmacy technician training programs at the University of Tennessee and Purdue University, which used the NPT Guidelines as the foundation for their original program

development. In some states, such as Kentucky, the Board of Pharmacy has formally recognized the University of Tennessee program as meeting the BOP requirements for nuclear pharmacy technician training.

It is our concern that ACPE, PTCB, NABP and other interested stakeholders are made aware of the existence of the NPT Training Guidelines and accredited programs, so that nuclear pharmacy technicians are not required to undergo a training or certification process that does not meet their specific needs. To assure competence, nuclear pharmacy technicians should be considered as a distinct group that requires certain minimal specialized training.

Using the template requested by ACPE's invitation to comment, the following additional information is provided regarding nuclear pharmacy technician personnel:

1. **Definition:** A nuclear pharmacy technician is an individual working in a nuclear pharmacy setting who, under the supervision of an authorized nuclear pharmacist, performs routine dispensing and other pharmacy tasks that do not require the professional judgment of a licensed pharmacist. Specific tasks may include dispensing of unit dose or bulk radiopharmaceuticals, elution of radionuclide generators, verification of activity of radiopharmaceutical doses by using appropriate decay calculations, verification of product quality with appropriate chromatography procedures, and performance of other quality assurance and radiation safety tasks. These duties are performed in accordance with applicable state or federal law.
2. **Levels of Pharmacy Support Personnel:** Nuclear Pharmacy Support Personnel may be defined as "pharmacy technicians," "dose drawing technicians," or "lab technicians."
3. **Roles, Responsibilities and Competencies of Support Personnel:** In nuclear pharmacy practice, those support personnel who assist the pharmacist in dispensing unit dose radiopharmaceuticals require a more formalized approach to training than other pharmacy personnel. In general, nuclear pharmacy personnel may be categorized into those that assist in the dispensing function and those that do not. In the vernacular, nuclear pharmacy technicians that assist in this process may be termed "dose drawing technicians." Note: Pharmacy support personnel within the nuclear pharmacy that perform health physics or radiation safety tasks, quality control procedures, but are not involved in dispensing, do not fit the general definitions of a "technician," promulgated by State Boards of Pharmacy. These tasks, which are not related to dispensing patient doses, do not generally require pharmacist oversight and are not considered "technician duties." Training to perform these duties is generally conducted "on the job" and the need for further formalized

training is minimal. For clarification sake, these nondispensing personnel are referred to as “lab technicians,” not pharmacy technicians or “dose drawing technicians.”

4. Education: For “lab technicians” as defined above, no formalized education is required. Hands on training during an orientation process is sufficient to assure competency.

For “dose drawing technicians” or “pharmacy technicians” involved in the preparation or dispensing of unit dose radiopharmaceuticals, training which meets the outcomes and competencies defined in the NPT Guidelines is desirable. This training and education may be through an accredited NPT training program or other program recognized by a state Board of Pharmacy.

Continuing education for nuclear pharmacy technicians should be specific to nuclear pharmacy and obtained from recognized providers or approved by a state Board of Pharmacy.

5. Training: The training outcomes and competencies from the NPT Program Guidelines are attached.

Entrance criteria may differ for a given NPT Training Program. However, a high school diploma or equivalent is considered a requirement, as is an understanding of mathematical concepts and the English language.

6. QA of Pharmacy Technician Education and Training

Training programs should conduct appropriate program review and follow-up to assess learning outcomes. The ACPE or ASHP accreditation process is certainly sufficient to assure quality of the training program. Other formal program review processes requiring outcome evaluation, learning assessment and continuous quality improvement may also be appropriate as long as state Board of Pharmacy requirements are met.

We hope that these comments serve as clarification of the specialized training requirements of technicians practicing in the nuclear pharmacy setting. To mandate that this group be certified as a pharmacy technician through PTCB (or other exam developed with retail or institutional pharmacy standards) would do little to assure competence or protect public safety.

We continue to support recognition of pharmacy technicians by state boards of pharmacy through registration and welcome the opportunity to discuss technician training. Please, feel free to contact our organization if you have further questions.

Sincerely,

A handwritten signature in black ink, appearing to be 'J. Norenberg', written in a cursive style.

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