



NATIONAL ASSOCIATION OF
CHAIN DRUG STORES

October 19, 2022

Via email: ron.briel@nebraska.gov

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

RE: Credentialing Review of the Nebraska statutes Relating to Pharmacy Technicians

Dear Mr. Briel:

On behalf of our 12 member companies operating over 270 pharmacies in the state of Nebraska, the National Association of Chain Drug Stores (NACDS) is writing to urge statutory changes to permanently and expressly authorize pharmacy technicians to participate in the technical act of administering vaccines. Across the country, NACDS supports states' efforts to make permanent the U.S. Public Readiness and Emergency Preparedness (PREP) Act temporary flexibilities that currently allow patients to continue to have convenient and high-quality healthcare access at neighborhood pharmacies. During the COVID-19 pandemic, these federal flexibilities empowered Nebraska pharmacies to expand access to essential care services, including vaccinations, testing, and therapeutics. However, the federal flexibilities supporting this important progress are temporary and will eventually expire, potentially resulting in harmful access gaps for vaccines and therapeutics in Nebraska communities.

NACDS acknowledges the Nebraska Pharmacists Association's (NPA) application to permit pharmacy technicians to administer immunizations under the supervision of a pharmacist with certain additional limitations, including limiting administration to intra-muscular in the deltoid muscle or subcutaneous on the arm to a person three years of age or older, and pharmacist verification of the activities of pharmacy technicians prior to administration. While NACDS broadly supports statutory changes to recognize and maintain pharmacy technicians' ability to administer vaccines, we strongly urge the Credentialing Review (407) Program to remove the added limitations on technician administered vaccines that were recommended by NPA. To help maintain access to essential healthcare services in neighborhood pharmacies across the state, we encourage the state to permanently codify the ability of technicians to participate in vaccine administration consistent with current allowances under the federal PREP Act.

NACDS thanks the Credentialing Review (407) Program for its efforts to allow patients continued access to convenient and high-quality healthcare access at neighborhood pharmacies in advance of the expiration of the federal flexibilities, particularly administration of immunizations by pharmacy technicians. For questions, please contact NACDS' Sandra Guckian at sguckian@nacds.org.

Sincerely,

A handwritten signature in black ink that reads "Steven C. Anderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steven C. Anderson, FASAE, CAE, IOM
President and Chief Executive Officer
National Association of Chain Drug Stores (NACDS)

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NACDS represents traditional drug stores, supermarkets and mass merchants with pharmacies. Chains operate over 40,000 pharmacies, and NACDS' over 80 chain member companies include regional chains, with a minimum of four stores, and national companies. Chains employ nearly 3 million individuals, including 155,000 pharmacists. They fill over 3 billion prescriptions yearly, and help patients use medicines correctly and safely, while offering innovative services that improve patient health and healthcare affordability. NACDS members also include more than 900 supplier partners and over 70 international members representing 21 countries. Please visit NACDS.org.