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Via Email

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

Email: ron.briel@nebraska.gov

**Re: Credentialing Review of the Nebraska Statutes Relating to Pharmacy Technicians**

Dear Mr. Briel,

On behalf of all pharmacies owned and operated by Walgreen Co. in the state of Nebraska, we thank you for the opportunity to provide comments on the credentialing review of the Nebraska statutes regarding pharmacy technician ability to administer immunizations.

Walgreens is very much in support of the Nebraska Pharmacist Associations Application for Pharmacy Technicians to Continue Administering Vaccinations and the subsequent proposed changed to Nebraska statute which would allow a trained and supervised pharmacy technician to administer vaccines. During the pandemic, the PREP Act was implemented which permitted pharmacy technicians to administer vaccines as directed by a pharmacist. This practice has not only increased efficiency but also improved patient access to vaccinations. It is essential that the State maintains this level of access for patients in the State to address social determinants of care especially in areas of Nebraska.

Over 20 states, including Iowa, Colorado, Missouri, and Wyoming have all taken steps to allow this activity. Additionally, numerous other states are in active discussions regarding regulation changes to allow this activity to be permissible in their state.

Within the first year of adopting these regulations, the Idaho Board of Pharmacy estimated that pharmacy technicians administered approximately 25,000 vaccines. There were no adverse events or errors reported to the Board of Pharmacy<sup>1</sup>, illustrating that with proper training, pharmacy technicians are capable of safely administering immunizations to patients.

Furthermore, internal surveys have highlighted positive feedback on pharmacy technicians administered immunizations by pharmacists, pharmacy technicians, and patients. The ability to delegate administrative tasks to trained pharmacy technicians allows for increased pharmacist capacity for engaging in additional clinical and patient care services.



### **Technician Immunization Program Feedback and Benefits:**

Pharmacists in the study felt that their immunizing pharmacy technicians were properly trained to administer immunizations, capable of giving immunizations, and empowered by their new role within the pharmacy.<sup>2</sup>

- Findings also included a pharmacist-perceived increase in vaccination rates and recommendation for other pharmacy technicians to be trained to administer immunizations.<sup>2</sup>
- Pharmacists' opinions revealed that working with newly trained immunizing pharmacy technicians has not only positively affected the morale of their team, but can help to increase the number of vaccinations given by the pharmacy.<sup>2</sup>
- There was no risk to pharmacist employment position as the pharmacist must complete clinical review prior to pharmacy technician administration to confirm vaccine eligibility and is responsible to confirm correct product and dosage is being provided by pharmacy technician.
- Providing the pharmacy technician the ability to complete the non-clinical task of immunization administration provides the pharmacist additional capacity to practice at the top of their licensure to engage patients in additional activities such as medication therapy management services, adherence monitoring, prescriptive authority, etc.

Walgreens fully supports the credentialing review and subsequent proposed changes to Nebraska statute which will allow a trained and supervised pharmacy technician to administer vaccines. We hope to see the expanding the role of pharmacy technicians to allow for increased duties, beyond administering immunizations, in the near future.

If you would like additional information, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Lorri Walmsley".

Lorri Walmsley, R.Ph.

### References:

1. Alex Adams, Shane Desselle, and Kimberly McKeirnan. "Pharmacy technician-administered vaccines: on perceptions and practice reality." *Pharmacy* 6.4 (2018): 124. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6306786/>
2. [Bertsch TG](#), [McKeirnan KC](#), [Frazier K](#), [VanVoorhis L](#), [Shin S](#), [Le K](#). July 2019. Supervising pharmacists' opinions about pharmacy technicians as immunizers. *J Am Pharm Assoc*. Volume 59, Issue 4, Pages 527-532. <https://www.ncbi.nlm.nih.gov/pubmed/31036525>