



September 19, 2022

Lindsey B. Courtney, J.D
7 Eagle Square
Concord, NH 03301
cc via email: lindsey.courtney@oplcnh.gov

Re: Pharmacy Rules in Process

Dear Ms. Courtney,

We at VillageMD appreciate the New Hampshire Board of Pharmacy (NHBOP) for the opportunity to comment on the proposed Pharmacy Rules. We appreciate the Board's regular language and policy updates reflecting changes in the practice of pharmacy.

VillageMD is a leading provider of healthcare for organizations moving toward a primary care-led, high-value clinical model. At VillageMD, we support and encourage team-based care centered around the patient, led by a primary care provider. We are excited about the proposed changes being utilized to enhance patient access to care and would like to propose a few edits which can improve patient safety in the state.

The duties of pharmacy technicians have evolved in the last couple of years, and appropriate pharmacists' supervision of pharmacy technicians is paramount to the health and safety of New Hampshire residents. There are two occurrences in the proposed pharmacy rules in process regarding pharmacist supervision of pharmacy technicians where edits would improve the public's access to care.

1. In Part Ph 1303.01 Qualifications, the current wording for pharmacist's supervision is on-sight yet the homonym onsite better reflects pharmacy practice.

- Allowing on-sight gives the requirement that a pharmacist must be viewing the pharmacy interns' and pharmacy technicians' administration of vaccines which would prevent the pharmacist from performing judgmental duties required for patient care.
- Using on-sight also prevents a patient's privacy in situations where clothing would need to be adjusted for proper vaccine administration.
- Changing the wording to on-site follows the directive from RSA 318:16:f and Guidance for PREP Act Coverage for Qualified Pharmacy Technicians which states "The supervising qualified pharmacist must be readily and immediately available to the immunizing qualified pharmacy technicians." This has no visual requirement that on sight demands.
- Modifying reflects language consistency where Ph 1809.04 (a) uses the wording of "on-site".

Additionally, editing "with" to "by" identifies the board as the authorizing entity instead of the pharmacist accompanied by the board as giving authority.

Proposed edits inline below:



(c) A pharmacy intern or pharmacy technician as authorized by RSA 318:16-b who is administering vaccines shall be supervised by an ~~on-site~~ **site** supervising pharmacist who is licensed ~~with~~ **by** the board to administer vaccines.

2. In Part Ph 1808.01 Responsibilities, current wording limits licensed advanced pharmacy technicians' inclusion in telepharmacy.

- Modifying “physically on premises” to “on-site” will reflect language consistency with Ph 1809.04 and proposed edits for Ph 1303.01.
- Adding “telecommunications technology” which is language from Part Ph 902.01 allows licensed advanced pharmacy technicians to participate at their license level in telepharmacy services. This addition also averts future regulation changes to allow this responsibility.

Proposed edits inline below:

(a) Perform all functions under the supervision of a licensed pharmacist who is ~~physically on premises~~ **on-site or available through telecommunications technology** and holds an unrestricted license issued by the board;

Thank you for your time and consideration on this matter. I can be reached at ahill@villagemd.com or 864-415-2151 for any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Allison Hill', written over a white background.

Allison Hill, PharmD
Manager, Pharmacy Affairs