



NATIONAL ASSOCIATION OF
CHAIN DRUG STORES



November 16, 2020

Juan A. Ruiz, Counsel
Pennsylvania State Board of Pharmacy
Via email: RA-STRegulatoryCounsel@pa.gov

RE: Proposed Rule on Chapter 27 – Pharmacy Interns

Dear Mr. Ruiz:

On behalf of our members that jointly operate more than 2,600 pharmacies in the Commonwealth, we write to support the proposed rule amending §§ 27.12, 27.401-27 and adding §27.408. Pharmacies have been eagerly anticipating this rule since the passage of Act 8 in 2015 and **the onset of the COVID-19 pandemic has made the adoption of this rule critically urgent. As such, in addition to asking for your support of the rule, we urge you take any steps necessary available to the Board to expedite its promulgation.**

Specifically, Act 8 further expanded pharmacists' authority to provide the influenza vaccine while also allowing authorized and trained pharmacy interns to administer immunizations and injectables under the direct supervision of a pharmacist. The language pertaining to pharmacists became effective 60 days after the bill's enactment in 2015, however, the intern authority required this regulatory action.

Pharmacy interns are pharmacy students that are in their professional years of a minimum 6- year doctoral degree. As part of their curriculum, student pharmacists complete the same rigorous training specific to immunizing as pharmacists. Without the ability to immunize under the direct supervision of a pharmacist during their clinical rotation, both Pennsylvania's students and patients are at a disadvantage. Our bordering states of New York, Maryland, Ohio, and West Virginia allow interns to immunize. Until we have this regulation in place, the Commonwealth risks continuing to lose our students to rotations at out-of-state locations where they can practice at the top of their training. Also considering that the Commonwealth boasts seven schools of pharmacy, interns are an untapped resource that could greatly assist with vaccinations, including the upcoming COVID-19 vaccine.

As the Board is well-aware, the convergence of COVID-19 and influenza this year will exponentially impact our already-strained healthcare system. Simply, absolutely all trained and qualified immunizers, including pharmacy interns, will be required to help meet the anticipated high demand for both flu vaccines and forthcoming COVID vaccines. This is why the 3rd amendment to the PREP Act was

recently issued, allowing for licensed or registered pharmacy interns to administer immunizations to persons aged 3 and older.

On a related note, for the time-sensitive reasons explained above, we urge the Board to accept pharmacy intern certificates as “registration” as required by the PREP Act Declaration, at minimum at least until the PALS system is updated and usable.

Thank you in advance and please feel free to contact jmccormack@nacds.org or rseipp@weismarkets.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Anderson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Steven C. Anderson, FASAE, CAE, IOM
President and Chief Executive Officer

A handwritten signature in black ink, appearing to read "Rick Seipp". The signature is cursive and somewhat stylized, with a prominent initial "R".

Rick Seipp, PharmD
President
Pennsylvania Association of Chain Drug Stores