Ohio | Common Sense Initiative

Mike DeWine, Governor
Jon Husted, Lt. Governor

Carrie Kuruc, Director

**MEMORANDUM**

**TO:** Alexandra Simon, State of Ohio Board of Pharmacy

**FROM:** Ethan Wittkorn, Regulatory Policy Advocate

**DATE:** **November 26, 2019**

**RE:** **CSI Review – Certified Pharmacy Technicians (4729:3-3-04)**

---

On behalf of Lt. Governor Jon Husted, and pursuant to the authority granted to the Common Sense Initiative (CSI) Office under Ohio Revised Code (ORC) section 107.54, the CSI Office has reviewed the abovementioned administrative rule package and associated Business Impact Analysis (BIA). This memo represents the CSI Office's comments to the Board as provided for in ORC 107.54.

**Analysis**

This State of Ohio Board of Pharmacy (Board) rule package consists of one amended rule. It was submitted to the CSI Office on October 18, 2019, and the public comment period was open through October 31, 2019. Unless otherwise noted below, this recommendation reflects the version of the proposed rules filed with the CSI office on October 18, 2019.

The proposed rule establishes allowable activities of a certified pharmacy technician. Amendments to the rule include the removal of requirements of documented positive identification by the certified pharmacy technician and pharmacist on duty to authorize a transfer of a prescription copy.

During the period of early stakeholder outreach, the Board placed the proposed rule before the Board's Rule Review Committee, which is composed of pharmacists from varying practice settings. Additionally, the proposed rule was approved by the Board of Pharmacy prior to submission. During the CSI public comment period, no comments were received.

Impacted communities include Certified Pharmacy Technicians, and the impacts include required

completion of compounding training before engaging in drug compounding, the completion of hazardous drug handling training prior to handling hazardous drugs, and potential administrative discipline for failing to adhere to the rules. The Board notes that the amendment to the rule will decrease associated administrative costs of the rule. The Board states that the proposed rule is necessary to promote and protect public safety by ensuring uniform training standards and oversight of pharmacy technicians.

## Recommendations

Based on the information above, the CSI Office has no recommendations on this rule package.

## Conclusion

The CSI Office concludes that the Board should proceed in filing the proposed rules with the Joint Committee on Agency Rule Review.