

June 20, 2024

Caroline Juran  
Executive Director  
Virginia Board of Pharmacy  
9660 Mayland Dr, St. 300  
Henrico, VA 23233

Dear Executive Director Juran and Members of the Board of Pharmacy:

I am writing to provide comments on the technician training requirements in Virginia.

As you may know, the Alliance for Pharmacy Compounding is the voice for pharmacy compounding, representing more than 500 compounding small businesses – including compounding pharmacists and technicians in both 503A and 503B settings – as well as prescribers, educators, researchers, and suppliers.

APC is concerned about the shortage of registered pharmacy technicians in Virginia. Since the implementation of the requirement for an ACPE/ASHP accredited technician training programs in 2022, there has been an unintended decrease in the number of pharmacy technicians. This high barrier to entry has led to many of ACPE/ASHP programs disappearing or becoming unaffordable.

APC suggests that the Board of Pharmacy consider alternative training programs beyond those listed in the currently outlined requirements. For compounding pharmacy technicians, options such as on-the-job training should be considered. The importance of technicians in pharmacy practice is clear, and decreasing the barriers to entry to attract additional technicians to the workforce in Virginia is key.

Thank you for your attention to these matters. If APC can serve as a resource on these topics or others related to compounding, we would be happy to assist.

Sincerely,



Scott Brunner, CAE  
Chief Executive Officer  
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