

Institute for the Certification of Pharmacy Technicians

2536 S Old Hwy 94, Suite 214, St. Charles, MO 63303

www.nationaltechexam.org

Phone: 314-442-6775

Fax: 866- 203-9213



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Jeanne Waggener, RPh
Rosemary Combs
Alice Mendoza, RPh
Texas Board of Pharmacy Subcommittee Members
William P. Hobby Building, Suite 3-600
333 Guadalupe Street
Austin, TX 78701

Dear Subcommittee members,

ICPT understands the need for Boards of Pharmacy to carefully scrutinize pharmacy technician exams and appreciates the opportunity to present information on the ExCPT[®] to the Texas Board of Pharmacy and interested parties. We are confident that the Texas Board of Pharmacy will recognize (as have other boards of pharmacy that have scrutinized the ExCPT) that it already has the information needed to approve the ExCPT with complete confidence that it is psychometrically sound, legally defensible and meets the same standards as the competing certification program.

Because the evaluation of a certification exam is complex and requires a certain level of expertise, ICPT decided to assist Boards with the review and approval process by seeking and obtaining accreditation by the recognized authority in the certification industry – the National Commission for Certifying Agencies (NCCA).

Colleges seek and obtain accreditation for the same reason that certification agencies do – so that stakeholders will know that they meet the established standards. Certainly, boards of pharmacy would be hard-pressed to evaluate colleges of pharmacy, much less compare them to each other. All boards of pharmacy recognize the value of national accreditation though ACPE as means for validating pharmacy school graduates. There is no formal investigative process of colleges of pharmacy undertaken by boards even though it is recognized that these colleges vary significantly with regard to their curricula, admission and progression policies, assessments and even pass rates on the NAPLEX.

Accreditation exists for a purpose and that is to demonstrate that an *independent* body of *experts* has ensured that the accredited agency meets established standards and does what it is supposed to do.

Since boards of pharmacy already recognize that accreditation agencies play a vital role in ensuring quality, the question, then, is whether NCCA accreditation is sufficient. NABP supports NCCA accreditation and referred to the achievement as “**an independent audit by certification experts**” and demonstration that a “**certification program adheres to current standards of practice in the certification industry**”.ⁱ Further, NABP has recognized that NCCA accreditation is an acceptable standard for boards to rely on in their September 2008 memo that states “If states refer to NCCA accreditation as a means of recognizing certification programs for technicians then both programs would satisfy this requirement”.ⁱⁱ PTCB (in which NABP has a controlling and financial interest stated that, “NCCA accreditation demonstrates that PTCB’s certification program properly discriminates between those who are qualified and those who are not qualified to be awarded the Certified Pharmacy Technician (CPhT) credential.”ⁱⁱⁱ It would follow, then, that any NCCA accredited exam should adequately discriminate candidates deemed competent to earn the credential.

What, then, is the purpose of a certification exam? For Texas, the purpose of a certification exam for pharmacy technicians is very similar to the purpose for the licensure exam for pharmacists. According to NABP, “The NAPLEX was developed with a single purpose, to insure a minimum standard of knowledge, skills and abilities necessary to practice pharmacy.”^{iv} Similarly, the purpose of pharmacy technician certification exams is to insure a minimum standard of knowledge, skills and abilities to perform the duties of a pharmacy technician. Obviously, more than one exam can meet the standard and one or more could even exceed the standard. Just as for colleges of pharmacy, two or more certification exams can differ in several ways, including pass rates, and still be acceptable.

How, then, would a board of pharmacy conduct its own *independent, expert* evaluation? Finding differences between two exams, of course, would not be evidence that one is “good” and the other is “bad.” The Texas Board of Pharmacy discussed at its November meeting the possibility of having approximately 100 candidates take each exam and compare them. Since there is no way to guarantee that these individuals are independent, or even experts, the results of a comparison would be more likely to measure satisfaction and preferences with the exam and not the soundness of the exam.

As the Board thinks through the evaluation process, it will need to consider the following questions:

- What criteria will be used to compare the two pharmacy technician certification exams?
- To what degree will these criteria rely on established certification industry standards?
- Will the criteria be developed by individuals with expertise in psychometrics?
- How will the comparison avoid bias and subjectivity?
- Will the Board insist that all approved technician certification exams be exactly the same even though it does not require all approved colleges of pharmacy to be exactly the same?

The relevant question seems to be, “If there is more than one qualified certification exam, can the people of Texas receive the benefit of competition or should the Texas Board encourage and promote a monopoly?” As we discussed at the November meeting, it is common for competition to exist in the certification industry. In nursing, there are multiple certification exams for nurse practitioners. It is our understanding that the Texas State Board of Nursing accepts multiple certification exams for critical care nurse practitioners. Regarding pharmacy technicians, in 41 states, both the ExCPT and the PTCE are options for pharmacy technicians. Having more than one exam gives technicians a choice, encourages innovation, improves services, reduces cost, and improves access.

One objection from our competitor and its financial partners to having more than one exam is that it might create some confusion. We understand that it is important to minimize confusion and feel that this is, indeed, another reason why the ExCPT should be approved. Confusion is greater when boards do not approve the ExCPT and technicians who were certified and recognized in other states now relocate to a state that does not recognize the ExCPT. In the 41 states where the ExCPT is an option, 21 state boards specifically recognize ExCPT certification; the balance of which have no means for recognizing certification, yet. In none of these states, has confusion been an issue for the Board or Board staff. Confusion for technicians, employers and other stakeholders is increased where technicians certified by an accredited exam find that a state does not recognize an exam that has been deemed to meet the industry standard for certification.

Recommendations

Rather than comparing exams to each other, a process fraught with challenges in subjectivity, our recommendation to the subcommittee is to evaluate the exams against objective end points such as the NCCA standards, which are clear, objective, industry standards for certification organizations for the following reasons:

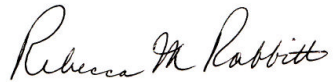
- NCCA Accreditation is an industry-accepted standard that has been recognized by NABP and PTCB as independent, expert validation of psychometric soundness
- NABP and PTCB recognize that NCCA-accredited certification exams do measure the minimum standards as defined by the profession
- The Texas Board of Pharmacy has already recognized the value of national accreditation as means for validating pharmacy school graduates

The Board is charged with protecting the public and instituting regulations that help accomplish that mission. NABP has told Boards that the “use of psychometrically sound and valid licensure and certification examinations support this mission”.¹ We understand the goal is for the subcommittee and the Texas Board of Pharmacy is to determine that any approved pharmacy technician certification exams are valid measures of pharmacy technician entry-level competence. NCCA accreditation is a standard in which the Board can be confident, with the benefit of eliminating additional demands on already stretched Board resources. We feel that the Board should approve any pharmacy technician certification exam that meets the established standards and refrain from creating a monopoly.

We hope our recommendations will be taken under consideration, as we believe this will provide the Board with an objective and legally defensible decision. Of course, we remain ready and willing to provide any information that will help the Board be comfortable and confident that approving the ExCPT is the correct course of action for the Board.

Thank you for considering our comments.

Sincerely,



Rebecca M. Rabbitt, MS, PharmD
Chief Executive Officer, ICPT
Sponsors of ExCPT

Cc: Gay Dodson, RPh, , Executive Director/Secretary

ⁱ Catizone, Carmen. National Association of Boards of Pharmacy memo to Executive Officers, April 24, 2008.

ⁱⁱ Catizone, Carman. National Association of Boards of Pharmacy memo to Executive Officers, September 9, 2008.

ⁱⁱⁱ PTCB Fact Sheet. "The PTCB Pharmacy Technician Certification Program Receives NCCA Accreditation". July, 2007.

^{iv} National Association of Boards of Pharmacy. NABP and NABPLEX: A Historical Perspective. NABP Newsletter. 1986;15(7):113-4.