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NHIA comments on the use of pharmacy technicians in sterile compounding

Alexandria, Va. (December 18, 2019) — State Boards of Pharmacy are evaluating the use of pharmacy technicians in sterile compounding and the [National Home Infusion Association](#) has become aware of instances where states are proposing to limit the use of technicians to perform sterile compounding procedures or are proposing policies that would potentially increase the risk of contamination in the controlled areas of the cleanroom.

NHIA strongly supports efforts to ensure all personnel who compound are appropriately trained and qualified. In home infusion, pharmacy technicians play a nearly ubiquitous role in today's sterile compounding operations and are an integral part of ensuring compounded sterile products are safe and free of contamination. As licensed and certified professionals, technicians demonstrate a high-level of knowledge and proficiency in sterile compounding techniques and procedures. Properly trained and supervised technicians are essential to home infusion pharmacies, which provide sterile parenteral medications to approximately three million patients annually.

Technicians in home infusion are critical to running clean rooms and maintaining compliance with a variety of regulations and standards, including those put forth by the United States Pharmacopeia (USP). In addition to compounding, technicians are responsible for cleaning and disinfecting; air and surface sampling; environmental monitoring; and much more. Pharmacists work closely and rely on technicians to perform these hands-on duties as valued and trusted team members.

These highly trained professionals are an integral staffing solution in a health care environment where operational effectiveness depends on clinical staff practicing at the top of their license. NHIA also recognizes licensing requirements and endorses certification and credentialing programs that promote advanced training, skills development, ethical practice, and professional excellence. Limiting the use of properly qualified technicians would have a devastating impact on patient access to compounded medications used in home infusion.

NHIA has written a letter to the New York State Board of Pharmacy for their change in enforcement of the existing rules preventing technicians from assisting pharmacists in

compounding activities from Assembly Bill 8319/Senate Bill 6517. The association has also written to the New Jersey Board of Pharmacy about a change in the application of a requirement for supervision of technicians during sterile compounding.

NHIA recommends that state licensing bodies and legislatures consider the full spectrum of pharmacy technicians' abilities and enduring focus on patient safety when drafting regulations that could unnecessarily limit their utility. In addition, we would caution states from enacting and enforcing laws that promote having unnecessary personnel in the ISO controlled areas, which would increase potential sources of contamination. NHIA welcomes the opportunity to consult on this topic to develop policies that balance the need for oversight of technician activities with the requirements of maintaining the controlled environment to ensure access to compounded sterile products is maintained for home infusion patients.

NHIA is a trade association that represents companies that provide infusion therapy to patients in their homes, as well as companies that manufacture and supply infusion and specialty pharmacy products. Infusion therapy involves patient-specific compounded medications, supplies, and a range of pharmacy, nursing, and other clinical services for delivering care to patients in the home setting. For more information, visit www.nhia.org.

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