



United Food & Commercial Workers Union

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July 17th, 2024

The Honorable Seung Oh
President, California Board of Pharmacy
2720 Gateway Oaks Drive, Suite 100
Sacramento, CA 95833

RE: July 18, 2024 Licensing Committee Agenda Item IV: Definition of Pharmacy Technician Trainee– Concerns

Dear President Oh and Board of Pharmacy Members:

The United Food and Commercial Workers Western States Council (UFCW) on behalf of its over 180,000 members, thousands of who are pharmacy technicians, writes with concerns about the proposed definition change of “pharmacy technician trainee” that will be addressed in the July 18, 2024 Board of Pharmacy Licensing Committee.

The proposed definition of “pharmacy technician trainee” would no longer require participation from an accredited body. Accreditation and other formal recognition of training programs from governing bodies protect pharmacy technician students and the public from predatory training entities. California has a recent history of protecting student consumers from private education

entities and recovering tuition costs from bad actors¹. With no outside accrediting entities, there is no mechanism for the state to evaluate training bodies and protect students. Removing all accountability from training entities may irrecoverably create harm for pharmacy technician trainees and pharmacy consumers.

Moreover, UFCW is concerned that unaccredited or non-state registered training programs for pharmacy technician trainees would likely cause further irregularities in pharmacy technician training. A lack of consistent education makes transferring pharmacy technician skills between pharmacy settings and companies difficult. Furthermore, non-accredited or state registered training programs have no accountability in meeting Equal EOC and similar race and gender protections for workers and job recruitment.

Our concern is that the proposed definition of a “pharmacy technician trainee” is too broad and needs further discussion by this subcommittee and board.

Sincerely,



Jassy Grewal, Legislative Director
UFCW Western States Council