



United Food & Commercial Workers Union

Amber Baur, Executive Director · Andrea Zinder, President · Kirk Vogt, Secretary-Treasurer · Nam Le, Recorder  
8530 Stanton Avenue, P.O. Box 5158 · Buena Park, California 90620 (714) 670-5580  
912 11<sup>th</sup> Street, Suite 600 · Sacramento, California 95814  
[www.ufcwwest.org](http://www.ufcwwest.org)

July 13, 2021

The Honorable Seung Oh  
President, Board of Pharmacy  
1625 North Market Blvd, Suite N219  
Sacramento, CA 95834

**Re: Board of Pharmacy Licensing Subcommittee July 14, 2021 Agenda Items**

Dear President Oh,

The United Food and Commercial Workers Western States Council (UFCW) on behalf of its over 180,000 members, writes in response to the Board of Pharmacy (“Board”) Licensing Subcommittee Agenda Items up for consideration on the July 14, 2021 meeting, which include expanding the scope of practice for Pharmacy Technicians, altering the pharmacist to pharmacy technician ratio, and creation of an Advanced Pharmacy Technician license.

UFCW strongly believes that these conversations are premature and the Board should agendaize these topics at a future Board meeting. The Board of Pharmacy just conducted and completed a workforce survey of pharmacists in California in June 2021 and we should wait for the results of that survey before making any decisions on workforce related issues. Engaging in lengthy conversations on these topics without adequate, unbiased data seems to be putting the cart before the horse. Furthermore, we have not assessed the impact that emergency waivers have had on Pharmacists, Pharmacy Technicians, and the pharmacy profession. Without this data, we are just shooting in the dark on what workforce related needs and solutions are direly needed.

Furthermore, UFCW would like to state its opposition to the creation of an Advanced Practice Pharmacy Technician license type. Previous proposed arguments in favor of an Advanced Practice Pharmacy Technician license in California include enhancing the scope of practice for consumer expediency interests, public safety, and career laddering. UFCW believes the creation of an additional Pharmacy Technician license to be counter to those objectives for the following reasons:

- Existing Pharmacy Technician Continuing Education (CE) requirements already allow for greater training opportunities to support consumer and public safety interests, without altering the scope of practice for Pharmacy Technicians.

- Creating an additional licensing requirement does not meet California's progress toward employer demand-driven, equity centered, and worker empowerment efforts toward job creation. Workforce development and training is moving away from supply-side “train and pray” models to industry demand learn-and-earn models (i.e. apprenticeship, employer/labor-management endorsed continuing education/stackable certificates) to better meet job existing demands and develop sustainable career laddering models. UFCW is supportive in the creation of these types of workforce training initiatives because they prepare workers for the reality of job demand.
- In President Biden July 9, 2021 Executive Order to address this and other competition-oriented workforce and economic initiatives, the Administration “Encourages the [Federal Trade Commission] to ban unnecessary occupational licensing restrictions that impede economic mobility”<sup>1</sup>. UFCW sees the creation of an additional license as working counter to these efforts and could harm California’s competitiveness relative to other states.
- Additionally, UFCW’s interest in this is critical because there are insufficient licensed Pharmacy Technicians relative to existing employer demand. California’s employed Pharmacy Technicians concentration is considerably lower than the national average at 71%<sup>2</sup>. This reality is further exacerbated in rural and lower income communities.
- Creation of an Advanced Practice Pharmacy Technician could worsen the earning potential for seasoned Pharmacy Technicians as they may not have the financial resources or time to dedicate to training and licensing as younger, less obligated Pharmacy Technicians. Effectively, an Advanced Practice Pharmacy Technician license requirement would create an income ceiling for existing Pharmacy Technicians instead of a pathway and, thereby, enhancing inequities for workers<sup>3</sup>. UFCW is concerned that adopting an Advanced Practice Pharmacy Technician licence would result in employment loss and wage stagnation for mid- to-late-career Pharmacy Technicians. 71% of Pharmacy Technicians nationally are women<sup>4</sup>. An Advanced Practice Pharmacy Technician could result in damaging career opportunities for California mothers. Additionally, an Advanced Practice Pharmacy Technician expectation for existing Pharmacy Technicians would be an unfair addition to their terminal career licensing requirements as they did not have the opportunity to calculate it into their career training plan. An Advanced Practice Pharmacy Technician could result in seasoned California pharmacy workers earning less than less experienced workers who had the opportunity to calculate the Advanced Practice Pharmacy Technician license in their career plan.

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<https://www.whitehouse.gov/briefing-room/statements-releases/2021/07/09/fact-sheet-executive-order-on-promoting-competition-in-the-american-economy/>

<sup>2</sup> [https://www.bls.gov/oes/current/oes292052.htm#\(9\)](https://www.bls.gov/oes/current/oes292052.htm#(9))

<sup>3</sup> <https://www.brookings.edu/research/how-occupational-licensing-matters-for-wages-and-careers/>

<sup>4</sup> <https://www.zippia.com/pharmacist-technician-jobs/demographics/>

It is for all these reasons and more, that we respectfully request that these items be discussed at a future Licensing Subcommittee meeting when additional data is made available from the Board of Pharmacy.

Sincerely,

A handwritten signature in black ink that reads "Amber Baur". The signature is written in a cursive, flowing style.

Amber Baur, Executive Director  
UFCW Western States Council

cc: Anne Sodgren, Executive Officer, Board of Pharmacy  
Members, Board of Pharmacy