

Virginia Department of Labor and Industry (DOLI)

Pharmacy Technician Student Work-Training Program Written Agreement

No child sixteen or seventeen years of age may be employed in occupations deemed hazardous under [Va. Code § 40.1-100](#) or [regulations](#) promulgated thereunder unless done as part of a work-training program pursuant to a written agreement with DOLI, [Va. Code § 40.1-89](#).

This Student Work-Training Program Written Agreement (Agreement) shall serve notice that the below name student is certified to participate in a Pharmacy Technician I or II Clinical Experience at the referenced in accordance with the Virginia Department of Education (VDOE) Career and Technical Education (CTE) guidelines and [Va. Code § 40.1-89](#):

Student Name _____

High School Name _____

Pharmacy Name _____

This minor's work shall:

- (1) be incidental to the student's training, shall be intermittent and for short periods of time and shall be under the direct and close supervision of a competent and experienced person;
- (2) include safety instruction given by the school and be correlated with on-the-job training given by the employer; and
- (3) based on a written schedule of organized and progressive work processes to be performed.

Students must be at least 16 years old to participate.

NOTE: Any pharmacist who is providing a Clinical Experience for high school students under the age of 18 is serving in a "custodial" capacity with the child and can be held criminally liable should any harm come to the child as a result of their exposure to drugs that could be considered dangerous, poisonous or injurious to the health of the child in their custody [Va. Code § 40.1-103](#).

Copies of this agreement shall be retained by the school and the pharmacy at their respective worksites, and a copy shall be filed with the Department of Labor and Industry.

DOLI will provide the option of implementing this agreement through DocuSign.

This written agreement may be revoked by DOLI at any time that it shall appear that reasonable precautions for the safety of such child have not been observed. [Va. Code § 40.1-89](#).

Student Specific Responsibilities

Criminal background checks of Pharmacy Technician I and II students are required prior to working in a pharmacy. A [Juvenile Records Request](#) submitted by the parent/guardian of the student through the Virginia Department of Juvenile Justice (VDJJ) will be deemed to meet this

requirement. Students shall complete the background check within the 90-day period immediately prior to the student's initial Clinical Experience placement. The process will be repeated if the student changes pharmacies. It shall be the student's responsibility to make timely arrangements for the background check and to pay all costs associated with such checks. The results of the request will be provided to the school prior to the student's Clinical Experience placement.

Pharmacy Specific Responsibilities

- (1) The pharmacy shall limit Clinical Experience job tasks involving direct handling of unpackaged prescription drugs assigned to Pharmacy Technician II students under the age of 18 to [Schedule VI](#) drugs. Pharmacy Technician I students shall not engage in the direct handling of unpackaged prescription drugs.
- (2) The pharmacy shall immediately notify (but within no later than three business days of the pharmacy's receipt of board action) the Program Director and CTE Administrator if the license of a pharmacist, registration of a pharmacy technician practicing at the pharmacy, or permit of the pharmacy is put on probation, suspended or revoked.
- (3) The pharmacy shall immediately notify (but within no later than three business days of the pharmacy's receipt of inspection results and any subsequent board action) the Program Director and CTE Administrator of the results of DHP inspections, including any violations issued and corrective action taken, penalties assessed and the terms of any consent orders.
- (4) Written records of safety and health instruction provided to the student by the pharmacy shall be maintained and be made immediately available to DOLI upon request.

School Specific Responsibilities

- (1) The school shall limit Clinical Experience job tasks involving direct handling of unpackaged prescription drugs assigned to Pharmacy Technician II students under the age of 18 to Schedule VI drugs. Pharmacy Technician I students shall not engage in the direct handling of unpackaged prescription drugs.
- (2) Criminal background checks of Pharmacy Technician I and II students are required prior to working in a pharmacy. A [Juvenile Records Request](#) submitted by the parent/guardian of the student through the Virginia Department of Juvenile Justice (VDJJ) will be deemed to meet this requirement. The school shall notify students of this requirement prior to enrollment in the program or if already enrolled, as soon as possible thereafter. Students will be informed by the school that the check must be completed within the 90-day period immediately prior to the student's initial clinical placement. The process will be repeated if the student changes pharmacies. The results of the request will be provided to the school prior to the student's Clinical Experience placement.
- (3) The Clinical Experience workplace ratio of supervisor to student shall be 1:1. Provided that the school division supervisor (a registered pharmacy technician) is present and provides

"direct and close supervision" to the student or assures that the pharmacist designates a licensed pharmacist or registered pharmacy technician to "provide direct and close supervision" to meet a one-to-one ratio of supervisors to students, DOLI would consider such an arrangement to comply with [Va. Code § 40.1-89](#).

- (4) The school shall inform the Program Director and CTE Administrator of any Pharmacy Technician I or II student under the age of 18 who has committed any felonious conduct involving alcohol, marijuana, a controlled substance, imitation controlled substance, or an anabolic steroid (reporting non-felony offenses involving these are subject to the principal's discretion). [Va. Code § 22.1-279.3:1\(A\)\(iii\)](#). The school shall immediately remove the student from any Clinical Experience at the pharmacy.
- (5) Prior to permitting a student under the age of 18 to participate in a Clinical Experience (and on a quarterly basis thereafter), the school shall check the Virginia Department of Health Professionals (DHP) [License Lookup](#) webpage for the prior three calendar years of licensing, inspection, violation and penalty history of the host pharmacy, pharmacist(s) and pharmacy technician(s) for significant violations of Board of Pharmacy regulations; and license probations, suspensions or revocations. A record of the searches shall be maintained for a period of three years.

NOTE: "Significant violations of Board of Pharmacy regulations" may include, but is not limited to, instances of drug diversion, drug theft, the appearance of a pattern of behavior indicative of systemic problems with inventory control, etc.

Should the check of DHP's License Lookup prior to student placement result in the identification of significant violations, license, registration, or permit probations, suspensions or revocations, the school division shall conduct an assessment of whether the pharmacy meets the high operational and ethical standards necessary to warrant inclusion in the Clinical Experience. The assessment shall be in writing and provided to DOLI, the student and the student's parent/guardian prior to the student being allowed to start a Clinical Experience at the pharmacy.

Notification to DOLI shall be sent to:

Assistant Director
Division of Labor and Employment Law
Virginia Department of Labor and Industry
North Run Business Park
1570 East Parham Road
Richmond, Virginia 23228

If the above assessment does not result in the initial placement of the student in a Clinical Experience with the subject pharmacy, no notification to the student, the student's parent/guardian or DOLI is required.

Should a quarterly check of DHP's License Lookup result in the identification of significant violations, license, registration or permit probations, suspensions or revocations, the school division shall immediately remove the student from the Clinical Experience at the pharmacy and conduct an assessment of whether the pharmacy meets the high operational and ethical standards necessary to warrant inclusion in the Clinical Experience. The assessment shall be in writing and provided to DOLI, the student and the student's parent/guardian prior to the student being allowed to return to a Clinical Experience at the pharmacy. Notification to DOLI shall be sent to the contact information referenced above.

- (6) Should the pharmacy notify the Program Director and CTE Administrator that the license of a pharmacist, registration of a pharmacy technician practicing at the pharmacy, or permit of a pharmacy is on probation, suspended or revoked, the school shall immediately remove the student from the Clinical Experience at the pharmacy and conduct an assessment of whether the pharmacy continues to meet the high operational and ethical standards necessary to warrant inclusion in the Clinical Experience. The assessment shall be reduced to writing and provided to DOLI, the student and the student's parent/guardian prior to the student being allowed to return to the Clinical Experience at the pharmacy. Notification to DOLI shall be sent to the contact information referenced above.
- (7) Should the pharmacy notify the Program Director and CTE Administrator of the final results of DHP inspections (including any violations issued, penalties assessed and the terms of any consent orders) which indicate the presence of significant violations, license probations, suspensions or revocations, the school shall immediately remove the student from the Clinical Experience at the pharmacy and conduct an assessment of whether the pharmacy continues to meet the high operational and ethical standards necessary to warrant inclusion in the Clinical Experience. The assessment shall be reduced to writing and provided to DOLI, the student and the student's parent/guardian prior to the student being allowed to return to the Clinical Experience at the pharmacy. Notification to DOLI shall be sent to the contact information referenced above.
- (8) Should the pharmacy notify the Program Director and CTE Administrator of drug diversions or drug thefts, the school shall immediately inform affected students and their parent/guardian of the notification. Upon receipt of such notification, the school shall immediately remove the student from the Clinical Experience at the pharmacy and conduct an assessment of whether the pharmacy continues to meet the high operational and ethical standards necessary to warrant inclusion in the Clinical Experience. The assessment shall be reduced to writing and provided to DOLI, the student and the student's parent/guardian prior to the student being allowed to return to the Clinical Experience at the pharmacy. Notification to DOLI shall be sent to the contact information referenced above.
- (9) Written records of safety and health instruction provided to the student by the school shall be maintained and be made immediately available to DOLI upon request.

STUDENT

Date of Birth_____

Name_____

Signature_____

Date_____

Pharmacy Technician Trainee License Number_____

Address_____

Phone_____

Email_____

PARENT/GUARDIAN

Date_____

Name_____

Signature_____

Address_____

Phone_____

Email_____

SCHOOL PROGRAM DIRECTOR

Date_____

Name_____

Signature_____

Pharmacy Technician/Pharmacist License Number_____

School Address_____

Phone_____

Email_____

LICENSED PHARMACIST OR NATIONALLY CERTIFIED PHARMACY TECHNICIAN

Date_____

Name_____

Signature_____

License Number_____

Pharmacy Permit Number_____

Pharmacy Address_____

Phone_____

Email_____

