Department of Education

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**CAREER AND TECHNICAL EDUCATION MEMO NO. 226-23**

**DATE:** August 4, 2023

**TO:** CTE Administrators

**FROM:** Dr. J. Anthony Williams, Director

Office of Career, Technical, and Adult Education

# SUBJECT: Update: CTE Pharmacy Technician Program Student Work-Training Agreement

Satisfactory completion of standards involving compounding within the career and technical education (CTE) pharmacy technician program by students under 18 years of age and registered with the Virginia Board of Pharmacy as a pharmacy technician trainee shall be met through manipulation of placebos (inert products) in a simulation environment and shall not involve physically mixing drugs together to produce a compounded drug product. Therefore, effective immediately, the Department of Labor and Industry (DOLI) pharmacy technician student work-training program written agreement has been cancelled. Please refer to the [CTE High-Quality Work-Based Learning (HQWBL) Guide](https://www.doe.virginia.gov/home/showpublisheddocument/35012/638054202652170000) for universal HQWBL forms.

**Background**

Virginia Code § 40.1-100.A.4, prohibits any child under the age of 18 to work in any capacity in preparing any composition in which dangerous or poisonous chemicals are used (e.g., compounding certain dangerous or poisonous prescription drugs) unless the child is working pursuant to a signed DOLI work-training program agreement pursuant to Va. Code § 40.1-89.

On November 18, 2022, the Virginia Department of Education (VDOE), in collaboration with the DOLI, Virginia Department of Health Professions (DHP), and Virginia Board of Pharmacy released guidance for the purpose of ensuring workplace health and safety of high school students under the age of 18 who participate in CTE pharmacy technician programs, see [Superintendent’s Memo 271-22.](https://www.doe.virginia.gov/home/showpublisheddocument/37773/638108428687430000) The result of this guidance was the DOLI pharmacy technician student work-training program written agreement and DocuSign process (which is no longer required).

If you have questions, please contact the Office of Career, Technical, and Adult Education, by email at [CTE@doe.virginia.gov](mailto:CTE@doe.virginia.gov) or by telephone at (804) 225-2052.

JAW/aar