



# Missouri Board of Pharmacy

## Update on COVID-19

March 23, 2020

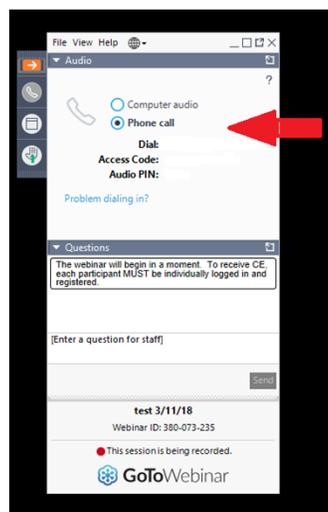
Kimberly Grinston, J.D.  
Executive Director

Tom Glenski, R.Ph.  
Chief Inspector



## Webinar Design

- All participants are muted in “listen only” mode
- Telephone audio option

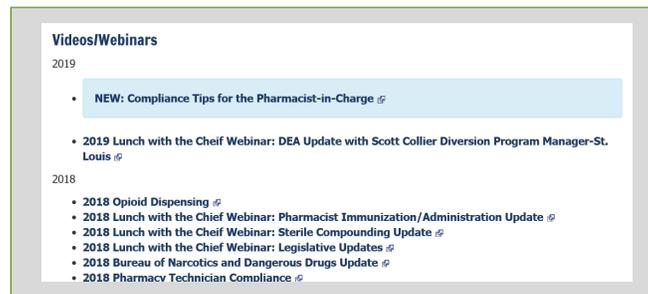


## Continuing Education

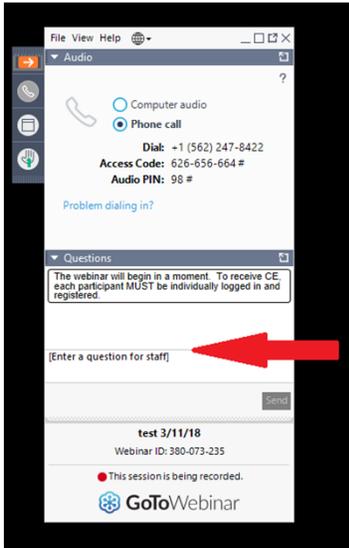
- Board-approved for one hour (0.1 CEU) of pharmacy continuing education
- Computer sharing is **not** allowed. You must enter the webinar with your own username to earn credit.
- CE instructions at the end of webinar
- CE credit is **not** submitted to CPE Monitor
- Save your certificates

## Handouts and Recordings

- Handouts posted on Board website: “Upcoming Events”
- Recording on Board website: News/Publications > Board Publications/Resources



## How to Ask a Question



## Missouri Board of Pharmacy

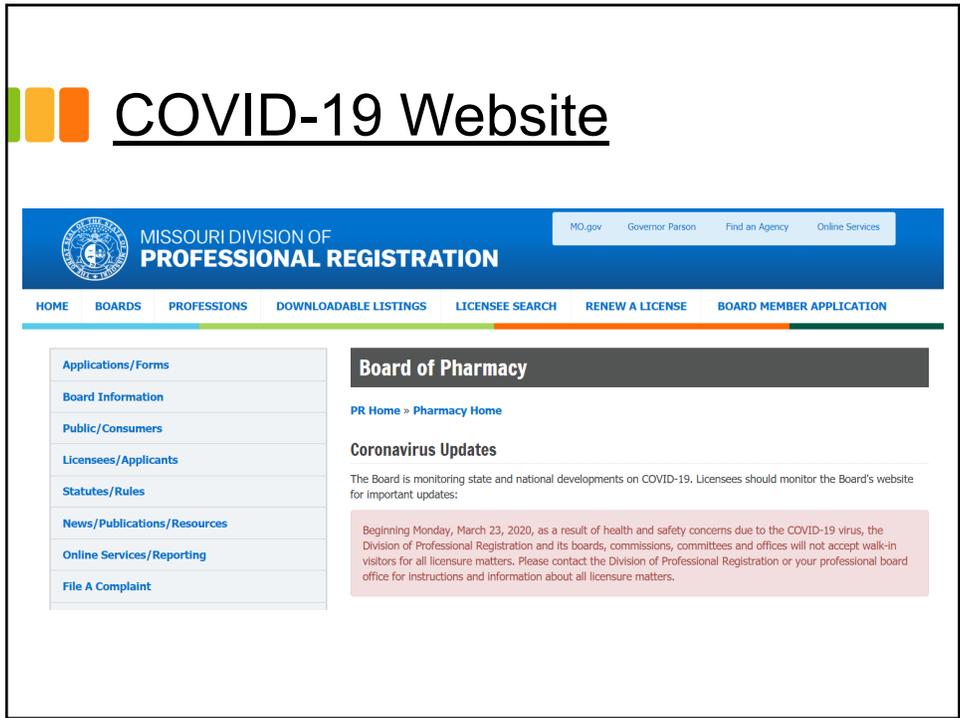
# Update on COVID-19

March 23, 2020

Kimberly Grinston, J.D.  
Executive Director

Tom Glenski, R.Ph.  
Chief Inspector

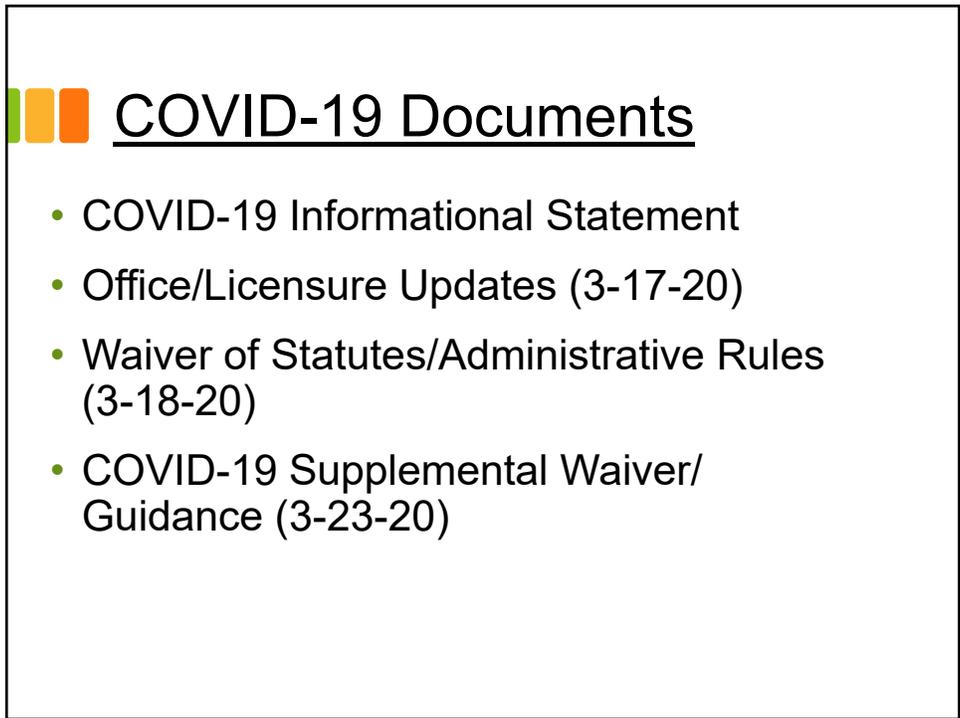




The screenshot shows the Missouri Division of Professional Registration website. At the top left is a logo with three vertical bars (green, orange, red) and the text "COVID-19 Website". Below this is a blue header with the Missouri State Seal, "MISSOURI DIVISION OF PROFESSIONAL REGISTRATION", and navigation links: "MO.gov", "Governor Parson", "Find an Agency", and "Online Services". A secondary navigation bar includes "HOME", "BOARDS", "PROFESSIONS", "DOWNLOADABLE LISTINGS", "LICENSEE SEARCH", "RENEW A LICENSE", and "BOARD MEMBER APPLICATION".

On the left side, there is a vertical menu with the following items: Applications/Forms, Board Information, Public/Consumers, Licensees/Applicants, Statutes/Rules, News/Publications/Resources, Online Services/Reporting, and File A Complaint.

The main content area is titled "Board of Pharmacy" and includes a breadcrumb "PR Home > Pharmacy Home". Under "Coronavirus Updates", it states: "The Board is monitoring state and national developments on COVID-19. Licensees should monitor the Board's website for important updates:" followed by a pink box containing the text: "Beginning Monday, March 23, 2020, as a result of health and safety concerns due to the COVID-19 virus, the Division of Professional Registration and its boards, commissions, committees and offices will not accept walk-in visitors for all licensure matters. Please contact the Division of Professional Registration or your professional board office for instructions and information about all licensure matters."



The screenshot shows the "COVID-19 Documents" page. It features the same logo and header as the previous page. The main content area lists four documents:

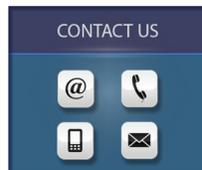
- COVID-19 Informational Statement
- Office/Licensure Updates (3-17-20)
- Waiver of Statutes/Administrative Rules (3-18-20)
- COVID-19 Supplemental Waiver/ Guidance (3-23-20)

## COVID-19 UPDATES

- Office/Administrative
- Licensing
- Waivers
- Miscellaneous
- Questions

## General Office Updates

- Board office is open and processing applications.
- Due to volume, please e-mail the Board office.



- [MissouriBOP@pr.mo.gov](mailto:MissouriBOP@pr.mo.gov)
- Inspector e-mails & phone #s online



# General Office Updates

MISSOURI DIVISION OF PROFESSIONAL REGISTRATION MO.gov

HOME BOARDS PROFESSIONS DOWNLOADABLE LISTINGS LICENSEE SEARCH RENEW A LICENSE

- Applications/Forms
- Board Information** ←
- Public/Consumers
- Licenses/Applicants
- Statutes/Rules
- News/Publications/Resources
- Online Services/Reporting

## Board of Pharmacy

PR Home » Pharmacy Home

### Board Information

- About the Board
- Annual Reports
- Disciplinary Orders
- Inspectors** ←
- Meetings
- Staff



# General Office Updates

MISSOURI DIVISION OF PROFESSIONAL REGISTRATION MO.gov Governor Parson Find an Agency Online Services

HOME BOARDS PROFESSIONS DOWNLOADABLE LISTINGS LICENSEE SEARCH RENEW A LICENSE BOARD MEMBER APPLICATION

- Applications/Forms
- Board Information
- Public/Consumers
- Licenses/Applicants
- Statutes/Rules
- News/Publications/Resources
- Online Services/Reporting
- File A Complaint

## Board of Pharmacy

PR Home » Pharmacy Home

### Coronavirus Updates

The Board is monitoring state and national developments on COVID-19. Licensees should monitor the Board's website for important updates:

Beginning Monday, March 23, 2020, as a result of health and safety concerns due to the COVID-19 virus, the Division of Professional Registration and its boards, commissions, committees and offices will not accept walk-in visitors for all licensure matters. Please contact the Division of Professional Registration or your professional board office for instructions and information about all licensure matters.



## Licensing

- Technicians can begin working once a completed application is mailed to the Board
- Completed application must be kept in the pharmacy
- Fingerprinting Technician Apps
  - Register with MACHS
  - Fingerprinted as soon as reasonably possible
- Only during State of Emergency
- Currently, tech renewal deadline (5/31).
  - Monitor Board Website
  - **Renew ONLINE**



## Licensing

- Pharmacist exams temporarily suspended by Pearson Vue
- NABP & Board still accepting/processing applications
- Non-Resident Licensing Waivers
- Notifications of Intent/CPR

## Waivers

- Executive Order 20-02
- Executive Order 20-04
- <https://governor.mo.gov/actions/executive-orders>



ABOUT THE GOVERNOR ▾ NEWS ▾ ACTIONS ▾ MISSOURI GOVERNOR MICHAEL L. PARSON PRIORITIES CONSTITUENT

Search

EXECUTIVE ORDERS

Search Year 2020 APPLY

03/18/2020 - Executive Order 4 - Easing Regulatory Burdens During State of Emergency

03/18/2020 - Executive Order 3 - Postponement of April Elections

03/13/2020 - Executive Order 2 - State of Emergency Regarding COVID-19

## Bd. of Pharmacy Waivers

- Emergency Dispensing
- Non-Resident License Portability
- Class-J Shared Services
- Sterile Compounding
- Dispensing Verified Medication
- Remote Data Entry (Work from home)
- Remote Product Verification
- Prescription Transfers



## Bd. of Pharmacy Waivers

- Emergency Dispensing
  - Prescriber unavailable
  - May dispense even if not originally filled/refilled by pharmacy [338.200.1(2)]
  - 30-Day Supply [338.200.2(1)]



## Bd. of Pharmacy Waivers

- Non-Resident License Portability
  - Non-resident pharmacists, pharmacy technicians and pharmacies may assist a Missouri licensed pharmacy during the State of Emergency
  - Must be licensed in the applicable profession in another U.S. state or territory
  - Good Standing
  - Missouri license not required during State of Emergency/Waiver Authorization
  - Missouri pharmacy should keep proof of non-resident licensure
  - 338.020, 338.013, 338.220

## Bd. of Pharmacy Waivers

- Non-Resident License Portability
  - **Emergency Practice Notification Form (Individuals Only)**
  - No fee
  - Begin practicing once filed
  - List Missouri pharmacy if known
  - Copy of Form in licensee's possession & Missouri pharmacy

## Bd. of Pharmacy Waivers

- Non-Resident License Portability



### EMERGENCY PRACTICE NOTIFICATION FORM

#### MISSOURI BOARD OF PHARMACY EMERGENCY PRACTICE NOTIFICATION FORM

STATE OF MISSOURI DIVISION OF PROFESSIONAL REGISTRATION MISSOURI BOARD OF PHARMACY	MAILING ADDRESS: MISSOURI BOARD OF PHARMACY PO BOX 625 JEFFERSON CITY, MO 65102 OVERNIGHT ADDRESS: 3605 MISSOURI BLVD. JEFFERSON CITY, MO 65109	FOR OFFICE USE ONLY
<ul style="list-style-type: none"> <li>- For faster processing, this form can be e-mailed to <a href="mailto:MissouriBOP@pr.mo.gov">MissouriBOP@pr.mo.gov</a> or faxed to: (573) 526-3464</li> <li>- Due to the State of Emergency, non-resident licensees may begin assisting a Missouri licensed pharmacy once this completed Notification Form is mailed, e-mailed or faxed to the Board office. An official license registration will not be issued by the Board.</li> <li>- KEEP COPY OF COMPLETED NOTIFICATION FORM FOR YOUR RECORDS</li> <li>- QUESTIONS: E-MAIL: <a href="mailto:pharmacist@pr.mo.gov">pharmacist@pr.mo.gov</a> or call (573) 751-0092</li> </ul>		RECEIVED DATE:

#### PERSONAL INFORMATION

Provide information for the non-resident licensee/registrant who will be assisting with pharmacy services due to the State of Emergency

## Bd. of Pharmacy Waivers

- Class-J Shared Services
  - Class-J permit not required to share services during emergency if it can't be promptly obtained
  - Includes Missouri licensed pharmacies
  - Includes non-resident licensed pharmacies that do not have a Missouri license/permit
  - Common database not required **but** pharmacists should ensure appropriate patient care and medication dispensing
  - Written contract/policy & procedure manual **but** shared services documented in advance in writing, including, who will perform patient counseling
  - If non-resident pharmacy not licensed in Missouri, proof of active license.

## Bd. of Pharmacy Waivers

- Sterile Compounding
  - Aseptic Skills Assessment can be accepted from another pharmacy (includes media fill testing)
  - Reuse of garb-
    - Talk with your supplier
    - First consider measures to conserve supplies (limiting staff in controlled area/modifying staging activities)
    - If still needed, appropriate aseptic processes must be followed to maintain the compounding environment and ensure the proper state of microbial control is preserved.
    - Revise P&Ps on new procedures & train staff
    - Assess staff before implementing
  - *CriticalPoint® COVID-19 webinar, USP guidance*
  - Check with other agencies (DHSS, etc.)

## Bd. of Pharmacy Waivers

- Dispensing Verified Medication: Technicians/ intern pharmacists can dispense verified medication when a RPh is not present if:
  - Medication was previously verified by a pharmacist & approved for dispensing, &
  - Dispensing is necessary safety for patient safety to provide disaster or emergency relief, &
  - Technician supervised in compliance with proposed rule 20 CSR 2220-2.710

## Bd. Proposed Rules

- 20 CSR 2220-2.710 (Pharmacy Technician & Intern Pharmacist Supervision)
- 20 CSR 2220-2.725 (Remote Data Entry)
- 20 CSR 2220-6.055 (Non-Dispensing Activities)
  - Attached to 3/20/20 Waiver Statement
  - SOS website at <https://www.sos.mo.gov/adrules/moreg/moreg>





## Bd. of Pharmacy Waivers

- Technician Remote Data Entry (Work from home)
  - Comply with proposed rule 20 CSR 2220-2.725
  - Sufficient technology to monitor technician's activity
  - Method of communication between pharmacist and technician
  - Pharmacist professional judgment
  - Maintain patient confidentiality
  - Any Missouri registered technician (also technicians licensed in another state under non-resident emergency license waiver)



## Bd. of Pharmacy Waivers

- Technician Remote Data Entry (Work from home)
  - Obtain patient history/information
  - Remote data entry
  - Billing and insurance claim submissions/review
  - Communicate with other health care providers
    - New/refill prescription requests
    - Prescription clarification
    - Prior authorization requests
  - Transfer non-controlled prescriptions to other pharmacy
  - Manage inventory, including purchasing and ordering

## Bd. of Pharmacy Waivers

- Remote Product Verification (See **3/23/20 Supplemental Statement**)
  - Physical verification by a pharmacist cannot be promptly performed
  - Prompt dispensing is in the best interest of the patient's health and safety
  - Technology is sufficient to accurately verify and check prescription contents & affixed label
  - Technician is supervised in compliance with proposed rule 20 CSR 2220-2.710
  - Technology used must maintain patient confidentiality

## Bd. of Pharmacy Waivers

- Remote Product Verification (See **3/23/20 Supplemental Statement**)
  - Not a blanket waiver for normal pharmacy staffing issues
  - **Only** if a pharmacist **\*\*CANNOT\*\*** be located or assigned to verify the final drug product in a timely manner and prompt dispensing is in the best interest of the patient's health and safety.
  - Temporary emergency solution
  - Other elements of dispensing have been appropriately addressed by a pharmacist either on-site or remotely as part of the dispensing process (e.g., data entry, DUR),

## Bd. of Pharmacy Waivers

- Remote Product Verification (See **3/23/20 Supplemental Statement**)
  - Can be done from another pharmacy
  - Can be done from home under emergency waiver

## Bd. of Pharmacy Waivers

- Can a pharmacist technician prepare a prescription without a pharmacist present?

Yes, if:

- Physical verification by a pharmacist **CANNOT** be promptly performed
- Prompt dispensing is in the best interest of the patient's health and safety
- Technology is sufficient to accurately verify and check prescription contents & affixed label
- Technician is supervised in compliance with proposed rule 20 CSR 2220-2.710
- Technology used must maintain patient confidentiality

## Bd. of Pharmacy Waivers

- Remote Product Verification (See [3/23/20 Supplemental Statement](#))

### Technician Preparing Prescription Without Pharmacist Present

- Not a blanket waiver for normal pharmacy staffing issues
- **Only** if a pharmacist **\*\*CANNOT\*\*** be located or assigned to staff the pharmacy in a timely manner and prompt dispensing is in the best interest of the patient's health and safety.
- Temporary emergency solution
- Other elements of dispensing have been appropriately addressed by a pharmacist either on-site or remotely as part of the dispensing process (e.g., data entry, DUR, final product verification)

## Bd. of Pharmacy Waivers

- **Caution:**
  - The permit holder, pharmacist-in-charge and the supervising pharmacist are **responsible** for ensuring **patient safety**, security of the pharmacy and its inventory, and ensuring **pharmacy services** are **provided properly and accurately** by the pharmacy in servicing the public.

## Prescription Transfers

- One Business Day Prescription Transfer Rule (20 CSR 2220-2.120)
- As soon as reasonable practical
- Good faith and act promptly to avoid interruptions in patient care
- Non-Dispensing Activity/Remote

## Miscellaneous

- Tele-Medicine
  - Executive Order 02-04
  - 334.108(1) & (4)
  - 191.1146
  - 20 CSR 2220-2.020(11)
- Valid telemedicine exam prescription can be dispensed (if otherwise valid)
- Prescribers must be licensed in their home states and in good standing
- BOHA may issue additional guidance



## Miscellaneous

- DEA website
  - <https://www.deadiversion.usdoj.gov/coronavirus.html>

### Telemedicine

On January 31, 2020, the Secretary of the Department of Health and Human Services issues a public health emergency ([HHS Public Health Emergency Declaration](#)).

**Question:** Can telemedicine now be used under the conditions outlined in Title 21, United States Code (U.S.C.), [Section 802\(54\)\(D\)](#)?

**Answer:** Yes

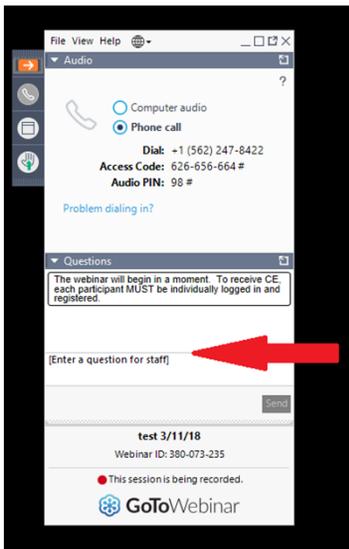
While a prescription for a controlled substance issued by means of the Internet (including telemedicine) must generally be predicated on an in-person medical evaluation ([21 U.S.C. 829\(e\)](#)), the Controlled Substances Act contains certain exceptions to this requirement. One such exception occurs when the Secretary of Health and Human Services has declared a public health emergency under 42 U.S.C. 247d (section 319 of the Public Health Service



## Miscellaneous

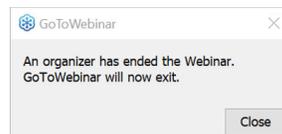
- Compounding Hand Sanitizer for OTC Use
  - FDA Policy for Temporary Compounding of Certain Alcohol-Based Hand Sanitizer Products During the Public Health Emergency
  - Contact FDA with different formula questions
- Hydroxychloroquine/Chloroquine
  - CDC guidelines
  - \*\*\*Joint Statement Issued Today (3/23/20)\*\*\*
- Personal Protective Equipment
  - Board is monitoring
  - No recommendations at this time
  - CDC Guidelines

## How to Ask a Question



## Continuing Education

- You must complete the post survey to earn CE credit
- Do not close your browser
- Click “close”



- Do not close your browser
- Survey will then open, answer questions, click submit
- Questions: [compliance@pr.mo.gov](mailto:compliance@pr.mo.gov)
- Survey must be submitted within 24 hours to receive CE credit
- Certificates will be mailed in approximately 30 days



Thank you for  
attending today's  
webinar.