

COVID-19 Waiver Comments – Draft Recommendations
September 2021 Board Meeting

Waiver	Entity	Comment	Draft Recommendation
Authorized the compounding and sale of certain alcohol-based hand sanitizer products by Ohio-licensed pharmacies and outsourcing facilities.	OPA	Although supplies have rebounded such that this service is not currently required, we see no reason that pharmacies should not have this option open in the event of a future need.	Resolution is tied to FDA authorization. Suggest retaining as long as FDA permits.
Authorized licensees conducting sterile compounding to reuse certain personal protective equipment (PPE). The waiver was updated to align with recently released PPE conservation guidance issued by the FDA.	N/A		Resolution is tied to FDA authorization. Suggest retaining as long as FDA permits.
Authorized automatic exemptions to rule authorizing the compounding of drugs in shortage (4729-16-10) under certain conditions.	N/A		Rescinded. Rule 4729-16-10 was rescinded effective July 1, 2021. FDA permits pharmacy compounding for drug shortages under temporary policy. Maintain authorization to compound under FDA authorization.
Authorized the extension of emergency refills.	OPA	We believe this language should be made permanent.	Maintain for now. Cannot extend as permanent.
	NACDS	Permanently implement.	

	ExactCare Pharmacy	<p>We strongly support the continuation of this waiver. This has been a major tool that has allowed us to continue to care for patients while their prescribers offices have been closed or otherwise unavailable/overwhelmed as a result of the pandemic. We have not seen an improvement yet, even though we are well into this 'new normal', which shows how much this continues to be necessary. If possible, the Board and the pharmacy community should provide similar guidance to the Legislature regarding recently introduced HB 37 that would significantly impact the 2nd or 3rd fill quantity and will negatively impact pharmacists ability to support patient adherence.</p>	
	OSU College of Pharmacy & Wexner Medical Center	<p>Patient access to chronic therapy is paramount to improve patient outcomes; due to issues around consistent access to healthcare providers due to social determinants of health, this allowance enhances opportunities for patients to maintain adherence while navigating the complex healthcare system. Underserved populations have greater healthcare disparities, and the pandemic has amplified barriers to receive healthcare and medications.¹ The Census Bureau’s Household Pulse Survey describes that 19% of adults delayed getting medical care due to the pandemic, 19% reported that they or someone in their household had experienced loss of employment, and 10% applied for unemployment (data collected April 28 – May 10, 2021).¹ Allowing patients the ability to receive necessary medications to treat chronic conditions through emergency refills can promote patient access, especially for those patients who already have a difficult time accessing medications, and for those who are trying to navigate unemployment and additional barriers. Make permanent</p>	
	Avita Health System	<p>All three of categories authorized under this waiver have permitted pharmacists to exercise their professional judgement to provide significantly better care to patients and supports the role of a pharmacist as provider. Patients have vastly improved continuity of care with this waiver intact.</p>	

	UC Health Pharmacy Services	Support. In a time of critical drug and technician staffing shortages, authorizing an extended supply of emergency refills for patients and providing the ability to adapt workflow and leverage available resources is essential to taking care of our patients and the community, in addition to maintaining daily operations.	
	CVS	Permanent <ul style="list-style-type: none"> The authorization to extend emergency refills provides for enhanced patient care and increased adherence to patient drug therapy. The Pharmacist will always use professional judgment when dispensing the emergency refill prescription based on the individual situation. 	
	Cleveland Clinic Specialty Pharmacy	Reason Temporary extension Aggregation of 25 different prediction models by CDC suggests an increase in COVID-19 cases nationwide Consolidated-Cases-Forecasts-2021-08-02 (cdc.gov)	
Authorized pharmacists, pharmacy interns, and pharmacy technicians licensed in other states to work in Ohio pharmacies under certain conditions.	OPA	No longer needed.	Maintain for now. Review in November 2020.
	OhioHealth	OhioHealth encourages that this waiver be considered for a modified permanent implementation by allowing the listed individuals to practice in Ohio based on their out of state license, but only while obtaining licensure in the state of Ohio. This way, the licensed professionals can then be tracked by the state of Ohio and can be more easily upheld to the laws and rules of the state. Additionally, this allows for the more seamless transfer of the authorized individuals who are seeking employment in the state of Ohio.	
	NACDS Cleveland Clinic	Make permanent. We encourage the Pharmacy Board to preserve this waiver at this time because it seems as though the applications for pharmacists, pharmacy interns and techs may be experiencing a backlog and it is difficult for these licensees to have their applications processed quickly. Further, shortages of pharmacy technicians have the potential to	

		significantly impact patient care, and access to pharmacy technicians and pharmacy interns outside of Ohio would close gaps in the pharmacy workforce. Without this waiver, patient care would be affected as our personnel would become much more limited.	
Cover My Meds		We support a permanent change to allow pharmacists, interns and technicians that are not licensed in Ohio to work on behalf of an Ohio licensed pharmacy. With the growth of remote work, this will allow pharmacies to expand their candidate pool and ultimately, their quality of practice. However, we believe there should be a requirement for the pharmacist, intern, or technician to become licensed in Ohio within a defined window, such as 6 months from the first date of support for an Ohio licensed pharmacy. This ensures that healthcare professionals do not try and bypass the licensure process in Ohio while also allow for businesses to be flexible in their growth strategies. Ohio has been a leader in allowing for reciprocity of licensure for pharmacists and we believe a six-month period allows for a pharmacist to successfully complete the process of licensure by reciprocity. For interns and technicians, 6 months would allow for successful completion of the application process to be licensed in Ohio.	
CVS		Permanent <ul style="list-style-type: none"> To address any possible workforce shortages that may occur during an emergency, the flexibility provided by The State of Ohio Board of Pharmacy by adopting guidance authorizing pharmacists, pharmacy interns, and pharmacy technicians licensed in other states to work in Ohio pharmacies under certain conditions supports patient care. 	
Ohio Pharmacy Leadership Collaborative		OPLC encourages that this waiver be considered for a modified permanent implementation by allowing the listed individuals to practice in Ohio based on their out of state license, but only while obtaining licensure in the state of Ohio. This way, the licensed professionals can then be tracked by the state of Ohio and can be more easily upheld	

		to the laws and rules of the state. Additionally, this allows for the more seamless transfer of the authorized individuals who are seeking employment in the state of Ohio.	
	ExactCare Pharmacy	We strongly support the continued use of remote prescription processes rules, and the ability to have pharmacists and technicians on the work force who are licensed in other states. This capability had a profound effect on our ability to maintain our staff and grow during the pandemic. The current rules make sense (licensed and good standing in their home state), and by utilizing appropriate information security tools to ensure privacy/HIPAA compliance, we've shown that this is a viable working model for those pharmacies who are able to utilize it. Please make this permanent.	
Authorized expedited onboarding of pharmacy technician trainees.	OPA	Although the COVID need has passed, there is still a critical shortage of technicians. We encourage the board to allow pharmacies to expedite onboarding, while still maintaining technician quality.	Maintain for now.
	CVS	Permanent <ul style="list-style-type: none"> • With the expansion of technician duties within the state, pharmacy technician personnel represent a critical role in the support of the pharmacist. The expedited onboarding of these pharmacy technician trainees help support the timely workload needs for the pharmacy staff. • Based on an 18-month experience of this waiver it represents a positive opportunity for pharmacy practice in the state. 	
	Cleveland Clinic Specialty Pharmacy	Reason Permanent extension According to the U.S Bureau of Labor Statistics, Employment of pharmacy technicians is projected to grow 4 percent from 2019 to 2029 BLS also noted that "pharmacy technicians may be need to take on a greater role in pharmacy operations because pharmacists are increasingly performing more patient care activities such as giving flu shots" and predicted that pharmacy techs "will need to perform tasks such as collecting patient	

		information, preparing more types of medications, and verifying the work of other technicians, tasks formerly done by pharmacists.” All of which will lead to CPhT shortage.	
	OSU College of Pharmacy & Wexner Medical Center	As a permanent regulation, this would allow health-systems to hire employees from non-pharmacy departments (e.g., Environmental services, nutrition support, etc.). This would allow pharmacies to involve technicians in pharmacy workflow as soon as Human Resources allows and complete training while supporting dispensing and patient care. Make permanent	
	OhioHealth	OhioHealth recommends that the Board of Pharmacy implement this authorization permanently.	
	UC Health Pharmacy Services	Support. In a time of critical drug and technician staffing shortages, authorizing an extended supply of emergency refills for patients and providing the ability to adapt workflow and leverage available resources is essential to taking care of our patients and the community, in addition to maintaining daily operations. Expedited onboarding of technician trainees, authorization for nurses to stock automated drug storage systems, and allowance of registered technicians/technician trainees to stock automated pharmacy systems aid in these efforts.	
	Avita Health System	The workforce shortage of pharmacy technicians continues to be severe and significant. Knowing that employers will require a drug test and background check for employment, allowing the technician to work under conditional approval for up to 120 days poses less of a risk to patient safety than having pharmacies work short staffed. Each pharmacy will still be required to provide the necessary training for a technician trainee to safely and effectively work. The risk vs benefits for the safety of Ohioans are clearly more beneficial with this waiver than without it.	
	NACDS	Make permanent.	

	Ohio Pharmacy Leadership Collaborative	OPLC recommends that the Board of Pharmacy implement this authorization permanently. This will become extremely important as we navigate through an extreme technician shortage.	
	ExactCare Pharmacy	Support the extension of the waiver	
	Heartland Healthcare Services	With the current labor pool, it is very hard to recruit qualified candidates. Once a candidate has been interviewed and is interested in a position, it has been taking upwards of thirty days to obtain the required background check in accordance with rule 4729:3-3-01. By granting technicians a status of 'In-Review - Conditional Approval', it allows the employee to quickly begin training rather than get frustrated and look for employment elsewhere. This is a benefit to both the pharmacy in that we can start training new staff sooner as well as the employee who is wants to begin working as soon as possible.	
Authorized prescribers working in an opioid treatment program licensed as a terminal distributor of dangerous drugs to temporarily delegate personally furnishing of buprenorphine products to nurses licensed under Chapter 4723. of the Revised Code.	OPA	This is no longer needed.	Maintain and make permanent through the rule-making process.
Authorized home delivery of medications by opioid treatment programs under specific conditions.	N/A		Maintain until mobile OTP rules have been finalized.
Authorized prescribers to delegate personally furnishing non-controlled drugs to nurses licensed in	OPA	No longer needed.	Maintain for now.
	Ohio Pharmacy Leadership Collaborative	OPLC is not aware of utilization of this waiver. There are concerns with improper tracking and process enforcement for patients. Recommend rescind.	

accordance with Chapter 4723. of the Revised Code.	Cleveland Clinic	We recommend the Pharmacy Board not rescind this waiver at this time because it has provided patients with additional safe access to medication. Providers are now able to spend more time with patients and patients are able to obtain their medication in a timely manner.	
	OhioHealth	OhioHealth is not aware of utilization of this waiver. There are concerns with improper tracking and process enforcement for patients. Recommend rescind.	
Authorized the temporary expansion of the maximum days' supply permitted under rules 4729-9-23 and 4729:5-5-18 of the Administrative Code from 31 days to 60 days.	OPA	This should be extended, due to increasing COVID 19 cases.	Maintain for now. And consider incorporation into rule with standards similar to combining refills.
	CVS	Permanent <ul style="list-style-type: none"> • Patient medication packaging is an important component to improving patient medication adherence. Nationally customized patient medication packages have increased as patients embrace this type of medication administration. • Based on the active waiver approved by the Board over the last 18 months and the improvement in patient medication adherence using this type of packaging the waiver should be moved to permanent status. 	
	PCA Pharmacy	As stated in the current rule, medications may be packaged in the same container as long as the quantity dispensed may not be more than a thirty-one day supply. We recommend adopting the waiver for 60 days' maximum day supply to allow for more flexibility in dispensing customized packaging which is increasing in usage in the long-term care patient population. The patients who often utilize this form of packaging consist of patients in lower acuity of care facilities or are in intermediate care facilities for individuals with intellectual disabilities (ICF/IID). These patients are typically on stable therapies that do not have many medication changes from month to month. The change would also allow for consistency with 4729-9-23(D) with beyond use dating	

		requirements as well as align closer to other states rules (60 days = Massachusetts & 90 Days = Texas).	
	Cleveland Clinic Specialty Pharmacy	Reason Temporary extension Aggregation of 25 different prediction models by CDC suggests an increase in COVID-19 cases nationwide Consolidated-Cases-Forecasts-2021-08-02 (cdc.gov)	
	ExactCare Pharmacy	Support this waiver becoming permanent. While it would be more challenging to use on a regular basis, extending to 90 days makes the most sense given that most patient's insurance will cover a 30 or 90 day supply. The recent extension of the Beyond Use Date from 60 days to 6 months makes this easy to implement.	
	NACDS	Permanently implement.	
Authorized licensees to perform sterile compounding for another licensee, referred to as central compounding.	OPA	This should be made permanent.	Maintain for now and develop rules to incorporate guardrails to make permanent.
	CVS	Permanent <ul style="list-style-type: none"> To ensure patients can always obtain their compounded sterile products timely, during an emergency, the Board should move this rule forward into permanent rule making. The requirements for the "originating facility" and "compounding facility" as provided by the Board support medication adherence and patient care. 	
	OSU College of Pharmacy & Wexner Medical Center	Compounding productivity is threatened by staffing issues and/or medication shortages. Central compounding allows inhouse batch production of medications to address these challenges. Especially in a larger facility, compounding products from once licensee to another that is still within the same organization has proven to be advantageous to reduce shortages. Make permanent	
	ExactCare Pharmacy	Support this waiver becoming permanent	
	Cleveland Clinic	The Pharmacy Board should extend this waiver because it has allowed us to provide medications safely across all of our sites. This waiver is especially helpful for organizations that are equipped to prepare the most complex sterile products. Under these circumstances, these organizations	

		can prepare them for smaller or less sophisticated facilities thus maintaining safe, high quality care across the care continuum.	
	Avita Health System	The ability for hospitals under common ownership to pool resources and provide care to patients collectively, instead of siloed at each facility allows for operational efficiency, lowered drug costs and safer practices. Operational efficiencies and lowered drug costs occur through more efficient compounding workflows (making 10 patient specific doses at one site as opposed to 8 at one site and 2 at another) and reduced drug waste (if those 10 patient specific doses could be made from 1 bulk bottle instead of 2 (1 at each site)). The more safe practices come from permitting a health system to centralize their compounding facilities and staff. Allowing staff to be more focused and more highly trained in the art of compounding. This benefits to Ohioans with this waiver intact out way the risks.	
	OHA	We are supportive of extending this waiver. Hospitals continue to find this flexibility helpful, as the situation surrounding drug shortages continues to worsen due to vaccine production and labor market constraints. We anticipate these challenges will likely continue, particularly with recent COVID-19 shortages. Central compounding may be needed to support patient care needs.	
	Ohio Pharmacy Leadership Collaborative	OPLC recommends that this waiver be considered for permanent approval when licenses are held by the same health-system. Outside of that recommendation, supportive through the period allotted by the FDA for licensees as the situation surrounding drug shortages is continuing to worsen in light of vaccine production and a tight labor pool. This is exacerbated by uncertainty related to COVID-19 going into the fall/winter. As such, there is a strong likelihood that centralized compounding may be needed to support patient care needs.	
	OhioHealth	OhioHealth recommends that this waiver be considered for permanent approval when licenses are held by the same	

		health-system. Outside of that recommendation, supportive through the period allotted by the FDA for licensees as the situation surrounding drug shortages is continuing to worsen in light of vaccine production and a tight labor pool. This is exacerbated by uncertainty related to COVID-19 going into the fall/winter. As such, there is a strong likelihood that centralized compounding may be needed to support patient care needs.	
	UC Health Pharmacy Services	The UC Health pharmacy department would like to advocate for central compounding of compounded sterile products to remain in effect, especially for multi-hospital health systems. These processes would prove valuable in supporting drug shortage situations or unforeseen circumstances.	
Authorized registered pharmacy technicians to stock automated drug storage systems and send and receive copies of non-controlled prescriptions, under certain conditions. Additionally, provides clarification on the positive identification requirements for technicians transferring prescriptions.	OPA	This should be temporarily extended.	Maintain for now.
	CVS	Permanent <ul style="list-style-type: none"> An important pharmacy practice element that the Board supported during the COVID – 19 pandemic was the expansion of pharmacy technician duties. Allowing Register Pharmacy Technicians, instead of Certified Pharmacy Technicians, to perform the administrative functions of stocking automated drug storage systems and sending/receiving copies of non-controlled prescriptions is appropriate. Trained Registered Pharmacy Technicians are qualified to complete both of these tasks. The positive feedback from the Board over the last 18 months attest to the success and support for such a permanent rule change. 	
	OhioHealth	OhioHealth encourages the permanent adoption of this waiver, as technicians have demonstrated their ability to perform these operational tasks over the last year. Additionally, this expands the technician hiring search during the market shortage that might have previously excluded Registered Pharmacy Technicians because of their inability to perform these functions. At a time that has shown to be difficult to hire pharmacy technicians, the	

		opportunity that this waiver offers pharmacies is critical to maintaining basic pharmacy operations.	
	ExactCare Pharmacy	Support the extension of this waiver, or making it permanent, provided the same oversight and supervision rules in maintained that are in place for Certified techs now.	
	Cleveland Clinic	Because of the pharmacy technician shortage, that shows no sign of abating, the Pharmacy Board should consider putting this through the rulemaking process to make this waiver permanent policy. Since the waiver was implemented, we have used it to allow registered technicians to stock our automated storage systems and we have been able to deliver care to patients more efficiently with the same level of safety. Without this resource, patient care would be impacted dramatically as patients would be forced to wait longer for much needed medications. To safeguard our patients, we developed a comprehensive training program to ensure the competence of all of our technicians.	
	Cincinnati Children's Hospital	Rationale for extending: Many technicians that we're able to hire in the hospital come from retail. They're not always able to take the certification test right away. Our simplest job task in the hospital is refilling automated dispensing machines. It's usually where we're able to fit them into training to get them staffing independently. Refilling an automated dispensing machine ends up being entirely less complex than other areas in the hospital. The current waiver has saved us tremendously in being able to staff and train technicians in a timely manner.	
	OSU College of Pharmacy & Wexner Center	Technician trainees being withheld the ability to stock automated dispensing devices (ADD) hinders the ability to staff the pharmacy with other technicians, interns, or pharmacists. Most technicians start out in medication delivery positions, and stocking ADD machines is part of that position's responsibility. Additionally, barcode verification as a safety measure occurs when the product is pulled from pharmacy inventory and upon stocking into the	

		ADD. This responsibility should not be limited to certified pharmacy technicians.	
	OHA	We are supportive of extending this waiver. Many hospitals are currently utilizing this waiver flexibility and see it as a critical need in institutional pharmacies. Facilities have stressed how this ability is helpful in addressing technician staffing shortages. Moreover, hospitals that have used this flexibility found the technicians competently demonstrated their ability to perform these operational tasks.	
	NACDS	Make permanent.	
	OSU College of Pharmacy & Wexner Medical Center	Technicians are an integral part of the pharmacy department. Utilizing them in this capacity would streamline department efficiency and keep automated pharmacy systems stocked with medications in other areas of the hospital with low risk to patient safety. Make permanent	
	Cincinnati Children's Hospital Medical Center	I am emailing to support the permanent practice of permitting "Registered Technicians" as well as "Trainees" to stock automated dispensing cabinets. With only certified technicians (and trainees) being permitted to sterile compound combined with the shortage of certified technicians, we found prior to the waiver we did not have enough eligible staff to stock our ADCs, putting an additional strain on staff and patient safety. We ended up with a shortage for staffing with both refilling ADCs and sterile compounding. With the authorized waiver, we have been able to staff our shifts accordingly and maintain stocking of ADCs as well as staffing for sterile compounding. We found that our registered techs and trainees were able to adjust to the new responsibilities in stocking ADCs with minimal to essentially no obstacles following adequate training. We also received a lot of positive feedback from our registered techs and trainees that training and interacting with the ADCs enabled them to be better prepared for their certification test. In addition to maintaining this ability for registered techs and trainees,	

		I would also recommend maintaining the requirement of barcode scanning at the fill station as well as training.	
	Mount Carmel Health System	<p>Mount Carmel Comment: We'd like the board to continue to allow registered pharmacy technicians and technician trainees to stock automated drug storage systems.</p> <ul style="list-style-type: none"> Pharmacy technician positions continue to be a critical need in institutional pharmacies – especially as we continue to treat COVID patients and prepare for a potential fall/winter surge. Registered pharmacy technicians have the ability to work in retail pharmacies filling prescriptions prior to pharmacist check. Giving a registered pharmacy technician and technician trainees the ability to stock automated drug storage systems after a pharmacist has checked the medications against the fill list, would support a critical need in institutional pharmacies. Currently if we want to hire a registered technician, we ask them to change their status with the board back to a technician trainee so that we can hire them for board appropriate institutional duties. Maintaining this waiver would allow for a wider technician candidate pool and would also limit requests for status change with the board of pharmacy. 	
	UC Health Pharmacy Services	<p>Support.</p> <p>In a time of critical drug and technician staffing shortages, authorizing an extended supply of emergency refills for patients and providing the ability to adapt workflow and leverage available resources is essential to taking care of our patients and the community, in addition to maintaining daily operations. Expedited onboarding of technician trainees, authorization for nurses to stock automated drug storage systems, and allowance of registered technicians/technician trainees to stock automated pharmacy systems aid in these efforts.</p>	
	Dayton Children’s Hospital	Allowing pharmacy technician trainees to do this work is especially helpful as we continue to have difficulties in	

		hiring fully trained technicians. The technician shortage has increased the need to hire and train individuals through the technician trainee program.	
	Ohio Pharmacy Leadership Collaborative	OPLC encourages the permanent adoption of this waiver, as technicians have demonstrated their ability to perform these operational tasks over the last year. Additionally, this expands the technician hiring search during the market shortage that might have previously excluded Registered Pharmacy Technicians because of their inability to perform these functions. At a time that has shown to be difficult to hire pharmacy technicians, the opportunity that this waiver offers pharmacies is critical to maintaining basic pharmacy operations.	
	Cleveland Clinic – Mercy Hospital	I think the waiver for registered technicians to be able to restock automated dispensing cabinets should remain permanent (enacted 12/14/2020). This has been a great help to us. In addition, some techs that are registered and have practiced for 30 years are no longer able to restock ADCs. I think if scanning is enabled, registered techs can certainly restock the machines.	
Authorized an extension of drug distributor customer due diligence requirements pursuant to paragraph (G) of rule 4729:6-3-05 of the Administrative Code.	OPA	No position on this waiver.	Waiver expired on 11/29/2020.
Authorized expedited licensure of drug distributors.	OPA	This should be extended.	Maintain for now.
	OSU College of Pharmacy & Wexner Medical Center	As the delta variant spreads, and more cities are documenting confirmed cases of this strain of the COVID-19 virus, additional distributors could aid in providing vaccines and medications to more parts of the country, especially if there becomes a need to reduce the strain of the larger distributors (McKesson, AmeriSource, Cardinal, etc.). We propose an extension of this waiver through the Federal State of Emergency.	

Authorized the sale and shipment of non-reportable dangerous drugs that are in shortage by unlicensed, out-of-state facilities.	OPA	No position on this waiver.	Rescind.
	NACDS	Made permanent.	
Authorized the use of temporary satellite locations for the storage and use of dangerous drugs during COVID-19.	OPA	Extend or make permanent	Maintain for now.
	Premier Health	As we are working to reach into our communities and reach the underserved and are doing more, smaller vaccination clinics I believe this waiver is still necessary to continue to reach our unvaccinated populace.	
	NACDS	Permanently authorize the use of temporary satellite locations for the storage and use of dangerous drugs;	
	OHA	We are supportive of extending this waiver. We recommend that this waiver be maintained, as there is still a great deal of uncertainty related to COVID-19, especially given recent data around surging case numbers. There is an ongoing possibility that temporary clinics may be needed to address increased demand of patient care.	
	Ohio Pharmacy Leadership Collaborative	OPLC recommends that this waiver be maintained, as there is still a great deal of uncertainty related to COVID-19 going into the fall/winter. As such, there is a strong likelihood that temporary clinics may be needed to address increased demand of patient care related to COVID- 19.	
	OhioHealth	OhioHealth recommends that this waiver be maintained, as there is still a great deal of uncertainty related to COVID-19 going into the fall/winter. As such, there is a strong likelihood that temporary clinics may be needed to address increased demand of patient care related to COVID-19.	
	OSU College of Pharmacy & Wexner Medical Center	As confirmed COVID-19 cases begin to rise, especially in light of the delta variant, this allows for more locations for critical medications to be stored and accessed. Should be extended through the Federal State of Emergency and provide a 60-day grace period to aid in transition once the Federal State of Emergency is lifted.	

<p>Permits the temporary reinstatement of lapsed or expired Ohio pharmacist licenses in Ohio under certain conditions.</p>	<p>OPA</p>	<p>No longer needed.</p>	<p>Rescind (provision in law has expired).</p> <p>NOTE: Retired or inactive pharmacists may still administer COVID-19 vaccines under the Federal Prep Act.</p>
<p>Authorized nurses (LPN, RN, APRN) to stock automated drug storage systems within a terminal distributor of dangerous drugs that has an on-site pharmacy under certain conditions.</p>	<p>OPA UC Health Pharmacy Services</p>	<p>No longer needed Support. In a time of critical drug and technician staffing shortages, authorizing an extended supply of emergency refills for patients and providing the ability to adapt workflow and leverage available resources is essential to taking care of our patients and the community, in addition to maintaining daily operations. Expedited onboarding of technician trainees, authorization for nurses to stock automated drug storage systems, and allowance of registered technicians/technician trainees to stock automated pharmacy systems aid in these efforts.</p>	<p>Maintain for now.</p>
<p>Authorized pharmacists, pharmacy interns, and certified pharmacy technicians to conduct FDA-authorized COVID-19 testing under certain conditions.</p>	<p>OPA NACDS CVS</p>	<p>This language should be made permanent</p> <p>Expand Existing Waiver: Permanently authorize pharmacists to order and administer, and pharmacy interns and registered pharmacy technicians to administer, FDA-authorized COVID-19 testing, in addition to all existing and future FDA-authorized point-of-care tests.</p> <p>Recommended New Change: Permanently establish a mechanism for pharmacists to initiate treatment based on test results for common conditions, including but not limited to, influenza, strep throat, and COVID-19.</p> <p>Permanent</p> <ul style="list-style-type: none"> As the practice of pharmacy was instrumental in moving forward in supporting patients in many new ways during the COVID – 19 pandemic testing was, and currently is, an important function that supports patient care in the state of Ohio. 	<p>Rescind, this is now the law (ORC 4729.42).</p>

		<ul style="list-style-type: none"> • The guidance that was provided by the Prep Act and supported by the Board should be moved to a permanent rule status to support patients now and in the future. • The positive outcome from the over 18 months of the actions from this change has supported the health of patients throughout the state. 	
	Cleveland Clinic	We suggest that the Board consider making this waiver permanent. With COVID-19 rising, it is now more important than ever that patients have access to testing. Authorized pharmacists, pharmacy interns, and certified pharmacy technicians have demonstrated their competence during this pandemic and there is nothing to suggest that there are any contraindications to allowing them to continue serving in this role. We urge the Board to consider putting this waiver through the rule making process to make this a permanent allowance for these licensees.	
	PCA Pharmacy	<p>One of the earliest interventions the nation had in battling the COVID-19 pandemic was the ability to utilize and expand COVID-19 testing. The guidance and opinions from the U.S. Department of Health and Human Services around the allowance for Pharmacists, Pharmacy Interns, and Pharmacy Technicians to perform CLIA-Waived tests allowed for more comprehensive testing to take place in both Ohio and the nation as a whole.</p> <p>The design of CLIA-Waived tests are to be simple and have low risk for erroneous results. These tests also come with detailed instruction on how to perform the test in order to allow the individual performing the test to have full knowledge in its operation. According to the CLIA regulations found in 42 CFR Chapter 493, Subpart B, there are no specific personnel qualifications to perform CLIA-Waived tests. We believe that allowing pharmacies to establish training programs for these simple tests would allow for increased ability for technicians to assist pharmacists in performing other CLIA-Waived tests for a multitude of conditions outside of COVID-19.</p>	

		We believe that pharmacy interns and technicians have proven that they are capable of performing these tests when appropriately trained by the pharmacy to perform them. We feel that these individuals would be completely qualified and should be permitted to continue performing this classification of testing after the end of the COVID-19 emergency period.	
	OSU College of Pharmacy & Wexner Medical Center	Continuing pharmacists' involvement in the management of the COVID-19 pandemic allows for more efficient testing and treatment. Pharmacist and pharmacy personnel involvement in the provision of care (testing, immunizations, etc.) during the pandemic has been well documented. This includes pharmacists, pharmacy interns and certified pharmacy technicians the ability to immunize patients seven years old or older. Make permanent	
	Dayton Children's Hospital	This allows patient testing to occur at an easy access site of care. Pharmacists are capable of performing this service with appropriate training.	
Authorized the sale and shipment of patient-specific, non-reportable dangerous drugs by non-Ohio licensed border state facilities to patients residing in the state under certain conditions.	OPA	No longer needed	Rescind.
	CVS	Permanent <ul style="list-style-type: none"> The guidance provides flexibility in the drug distribution system. The Board provided excellence guidance regarding patient counseling for medications dispensed, shipped or sold. In addition, proper home state licensure is required and must be in "good standing". The permanent rule will allow for continuity of care based on a emergency. 	
Authorized an Ohio pharmacy to request a temporary waiver to permit a pharmacist to supervise up to five pharmacy technician trainees at one	OPA	Make permanent	Maintain for now.
	CVS	Permanent <ul style="list-style-type: none"> Training is a key component to the success of Pharmacy Technician program. The expansion of the Board ratio of 5:1 is supportive allowing for the flexibility to selectively train increased numbers of Pharmacy Technicians as needed. 	

time (up from the current limit of three).		<ul style="list-style-type: none"> The increase in ratio is invaluable to several Pharmacy practice setting, particularly "closed door pharmacies" many times servicing institutional facilities. 	
	ExactCare Pharmacy	Support this waiver becoming permanent	
	PCA Pharmacy	<p>We applaud the OBOP for allowing an increase in the pharmacy technician trainee ratio to assist with addressing staffing shortages during this current pandemic period. We believe that this has allowed the pharmacy to ensure that adequate staffing is in place to meet the needs of our patients.</p> <p>We believe that allowing for this expansion to remain would allow our pharmacy to continue to address the current and trending hiring market for pharmacy technicians while continuing to provide safe and effective care for our patients.</p>	
	Cleveland Clinic Specialty Pharmacy	<p>Reason Permanent extension</p> <p>According to the U.S Bureau of Labor Statistics, Employment of pharmacy technicians is projected to grow 4 percent from 2019 to 2029 BLS also noted that "pharmacy technicians may be need to take on a greater role in pharmacy operations because pharmacists are increasingly performing more patient care activities such as giving flu shots" and predicted that pharmacy techs "will need to perform tasks such as collecting patient information, preparing more types of medications, and verifying the work of other technicians, tasks formerly done by pharmacists." All of which will lead to CPhT shortage.</p>	
	Dayton Children's Hospital	<p>Allowing up to four or five tech trainees at one time will allow the pharmacy to begin with the next trainee while the current trainees are finishing and becoming certified. Allows for flexibility when needed during this technician shortage.</p>	
	Cover My Meds	We believe the pharmacy technician trainee ratio should be permanently expanded and left to the discretion of the Pharmacist-in-Charge and the Pharmacist on Duty to agree	

		on the maximum number of trainees at one time for that specific site. Our belief is that every pharmacy practice is different and requires a different level of oversight from the pharmacist based on the natural checks in the specific process, with one example being the completion of a pharmacist verification after data entry by the trainee.	
	OSU College of Pharmacy and Wexner Medical Center	This would create an extension of pharmacists in a way that would allow them to perform their duties with efficiency and effectiveness. This is important, as the results of the 2021 Pharmacist Workload Survey showed that 51% of pharmacists felt they did not have sufficient pharmacy technician staffing that allowed for safe patient care.	
	NACDS	Permanently remove ratio restrictions on pharmacy technician trainees (Waiver: Extend authorization for an Ohio pharmacy to request a temporary waiver to permit a pharmacist to supervise up to five pharmacy technician trainees at one time (up from the current limit of three))	
Authorized the temporary waiver of the 5 percent limit on the occasional wholesale sales of dangerous drugs by a licensed pharmacy set forth in rule 4729:5-3-09 of the administrative Code.	OPA	Extend this waiver permanently.	Still DEA policy (click here), tie to federal authorization.
Extends recertification of primary and secondary engineering controls in accordance with guidance issued by USP.	OPA CVS	This is no longer needed. Permanent <ul style="list-style-type: none"> • Critical to the requirements of supporting patient's medication needs is the maintenance of infusion and sterile compounding facilities. The adoption of the resolution into a permanent rule will ensure life sustaining medications will be delivered to patients during times of an emergency. • The Board has taken all the precautions needed to ensure patient safety during these critical situations. • The resolution has been in place for over 15 months. 	Rescind.

Authorizes a licensed terminal distributor of dangerous drugs (TDDD) to mail or deliver non-controlled drugs to patients that have been personally furnished by a prescriber that is employed or contracted by the terminal distributor.	OPA	No longer needed	Maintain for now.
	Ohio Pharmacy Leadership Collaborative	OPLC encourages this waiver to be temporarily extended. As the use of virtual visits has been expanded and continues to be utilized by patients, the need for alternative options to personally furnish products exists. By permitting the mailing of personally furnished non-controlled substances, access to medications is expanded and can improve patient outcomes.	
	OhioHealth	OhioHealth encourages this waiver to be temporarily extended. As the use of virtual visits has been expanded and continues to be utilized by patients, the need for alternative options to personally furnish products exists. By permitting the mailing of personally furnished non-controlled substances, access to medications is expanded and can improve patient outcomes.	
Permits registered pharmacy technicians and pharmacy technician trainees to stock automated pharmacy systems and automated drug storage systems at a location licensed as a terminal distributor of dangerous drugs, subject to certain conditions	OPA	No position on this waiver.	Maintain for now.
	CVS	Permanent <ul style="list-style-type: none"> • Provides flexibility for the Pharmacist who is managing this drug distribution process. • Appropriate training and quality assurance processes are in place which allowed this program to be successful for the Board for over twelve months. • Bar-code scanning support the automation driven by the system. 	
	Ohio Pharmacy Leadership Collaborative	OPLC would encourage the permanent adoption of this waiver, as technicians have successfully demonstrated their ability to perform these tasks over the last year. Additionally, this expands the technician hiring search that might have previously excluded Registered Pharmacy Technicians or Pharmacy technician trainees because of their inability to perform these functions. Stocking of automated drug storage systems is critical to hospital pharmacies. It has been difficult to hire certified pharmacy technicians in recent months, but permanent implementation of the contents of this waiver would allow for hospital pharmacies to expand their technician hiring	

		scope to that of registered pharmacy technicians and pharmacy technician trainees.	
	OHA	We are supportive of extending this waiver. As mentioned above, we support continuing the waiver opportunities around pharmacy technicians.	
	OhioHealth	OhioHealth would encourage the permanent adoption of this waiver, as technicians have successfully demonstrated their ability to perform these tasks over the last year. Additionally, this expands the technician hiring search that might have previously excluded Registered Pharmacy Technicians or Pharmacy technician trainees because of their inability to perform these functions. Stocking of automated drug storage systems is critical to hospital pharmacies. It has been difficult to hire certified pharmacy technicians in recent months, but permanent implementation of the contents of this waiver would allow for hospital pharmacies to expand their technician hiring scope to that of registered pharmacy technicians and pharmacy technician trainees.	
Temporarily suspends in-person training requirements for obtaining BLS in paragraph (M) of rule 4729:1-3-02 and (A)(3) of rule 4729:2-3-03 of the Administrative Code.	OPA	Recommend extending this waiver.	Maintain for now.
	OhioHealth	OhioHealth recommends that the Board of Pharmacy uphold this waiver temporarily.	
	Cleveland Clinic	The need for new healthcare providers to be certified to administer vaccines has dramatically increased during the COVID-19 pandemic. Basic Life Support courses are at full capacity with those wishing to meet this demand. In response, virtual courses have allowed for vaccinators to become certified more rapidly. Because access to vaccines is critical and there is a possibility that a third vaccine may be indicated, it is imperative that we have as many vaccinators available as possible. Therefore, we suggest that this waiver remain in place to ensure patients have ready access to vaccines.	
	CVS	Permanent <ul style="list-style-type: none"> As recognized by the Board, pharmacists and pharmacy interns may obtain online BLS certification from the following organizations 	

		<p>approved by the Board in order to administer vaccinations in accordance with the Ohio vaccination process. 1) The American Red Cross; 2) The American Heart Association; or 3) The American Safety and Health Institute (ASHI).</p> <ul style="list-style-type: none"> • Appropriate patient care is provided with the updated rule, thereby supporting a changed to permanent status. 	
	Cleveland Clinic Specialty Pharmacy	Reason Temporary extension Aggregation of 25 different prediction models by CDC suggests an increase in COVID-19 cases nationwide Consolidated-Cases-Forecasts-2021-08-02 (cdc.gov)	
	Ohio Pharmacy Leadership Collaborative	OPLC recommends that the Board of Pharmacy uphold this waiver temporarily until the pandemic resolves to maintain social distancing.	
	OSU College of Pharmacy & Wexner Medical Center	<p>This allows for licensees to become trained and perform duties regardless of certification, especially as COVID-19 cases increase regarding the delta variant.</p> <p>Should be extended through the Federal State of Emergency and provide a 60-day grace period to aid in transition once the Federal State of Emergency is lifted.</p>	
	OHA	We are supportive of extending this waiver.	
	PCA Pharmacy	<p>Due to the COVID-19 pandemic, many providers were required to utilize online platforms to obtain or renew certification in basic life support for the purpose of being able to provide immunizations for our patients.</p> <p>We support allowing for the utilization of on-line classes to renew BLS certification through the use of interactive platforms such as those designed by the American Red Cross. We feel that this solution allows for the same education and, at time, a more interactive experience through the modules.</p>	
Temporarily expands the pharmacy intern supervision requirements in OAC 4729:2-1-01 for	OPA	Recommend extending this waiver.	Maintain for now.
	OhioHealth	OhioHealth recommends that the Board of Pharmacy implement these expanded ratios permanently. As there is still uncertainty around the vaccine need going forward,	

interns administering COVID-19 vaccine.		allowing for expanded pharmacist intern supervision creates opportunities to balance potentially high vaccine needs with public demand.	
	OHA	We are supportive of extending this waiver. We recommend the Board implement these expanded ratios permanently. One example of the need for this waiver is the uncertainty around vaccine activity going forward. Allowing for expanded pharmacist intern supervision creates opportunities to balance potentially high vaccine needs with public demand.	
	CVS	Permanent <ul style="list-style-type: none"> Based on immunization requirements during the COVID – 19 pandemic and forecasting patient needs in the future establishing a process allowing for the maximum number of Pharmacy interns to administer immunizations in the setting established by the Board supports proper patient care. The updated Board guidance over the last several months supports the allowance for enhanced flexibility for the pharmacy workforce during times of increased demand for pharmacy services. 	
	Ohio Pharmacy Leadership Collaborative	OPLC recommends that the Board of Pharmacy implement these expanded ratios permanently. As there is still uncertainty around the vaccine need going forward, allowing for expanded pharmacist intern supervision creates opportunities to balance potentially high vaccine needs with public demand.	
	Cleveland Clinic	Over the past year, interns have safely administered the COVID-19 vaccine under the expanded guidelines. Because we need to make certain we have all of the resources available in the event that a third booster shot is indicated, we believe it is in the best interest of Ohioans to keep this waiver in place to make certain we have as many vaccinators as possible.	
	OSU College of Pharmacy & Wexner Medical Center	As the number of COVID-19 cases begin to rise, especially in relation to the delta variant, and the possibility for a needed booster exists, it is important to allow citizens best access to vaccinations. This expansion allowed for several	

		<p>successful mass vaccination efforts across the state during the pandemic. The ability to integrate more pharmacy students, faculty and staff in mass vaccination clinics will benefit future pandemic needs as well as other immunization efforts, such as annual influenza immunization.</p> <p>Make permanent</p>	
	NACDS	<p>Permanently remove ratio restrictions on pharmacy interns (Waiver: Temporarily expands the pharmacy intern supervision requirements in OAC 4729:2-1-01 for interns administering COVID-19 vaccine. Within the COVID testing waiver: Waiving the standard 2:1 pharmacy intern to pharmacist ratio, as required by rule is hereby waived for the provision of COVID-19 testing.)</p>	
<p>Authorization of use of support personnel for packaging shipping containers and to package medications for delivery or sale.</p>	PCA Pharmacy	<p>The allowance for support personnel to assist with medication packaging has been instrumental in providing benefit the closed door pharmacy workflow. Our medications are all delivered to long-term care facilities on delivery routes, and as such, need to have medications scanned into the respective delivery totes prior to delivery.</p> <p>Our pharmacy has utilized barcode scanning technology to ensure that the right medication is sent to the right patient at the right time. Current technologies allow for systems to not only monitor that medications go to the correct nursing facility, but also provide feedback in the event the medication was not appropriately scanned. Prior to delivery of medications, prescription queues are checked to ensure that all medications are scanned into the correct tote prior to closure and delivery. With the advances in technology, we believe that this task is fully capable of being performed by support personnel.</p>	<p>Maintain for now.</p>
	OhioHealth	<p>OhioHealth recommends that the Board of Pharmacy implement this authorization permanently.</p>	
	CVS	<p>Permanent</p> <ul style="list-style-type: none"> Pharmacy automation requirements using bar-code scanning to ensure accuracy for packaging of drug product/patient prescription order information. 	

		<ul style="list-style-type: none"> • Technology will alert the user if an incorrect drug product/patient information is processed. • A detailed Quality Assurance plan will accommodate the support personnel packaging process. • Detailed training program will be used to educate the support personnel. • Board successful program to date using supportive personnel in the packaging process. 	
	OPA	No longer needed.	
	Ohio Pharmacy Leadership Collaborative	OPLC recommends that the Board of Pharmacy implement this authorization permanently. Critical thinking is not required for this function. The elements required for a certified technician does not impact the safety of this process.	
	ExactCare Pharmacy	Support making this waiver permanent, this would continue to allow flexibility for using non-technicians in clerical or other roles that wouldn't require specific tech training	
	Cleveland Clinic Specialty Pharmacy	Reason Temporary extension Aggregation of 25 different prediction models by CDC suggests an increase in COVID-19 cases nationwide Consolidated-Cases-Forecasts-2021-08-02 (cdc.gov)	
	NACDS	Make permanent.	