



COVID-19 Response Efforts

Updated 4/3/2020

The State of Ohio Board of Pharmacy is committed to protecting the health and safety of Ohioans during the COVID-19 outbreak. This document outlines the Board's COVID-19 guidance and response efforts, including the issuance of waivers to assist our licensees in addressing operational needs, and will be updated regularly. **Please be advised that a new waiver was issued today.**

For more information on the state's efforts to address coronavirus, visit www.coronavirus.ohio.gov or call 1-833-4-ASK-ODH.

DEA Guidance on Oral CII Prescriptions

UPDATED 4/3/2020 - DEA has issued a flow chart to assist licensees in navigating the new guidance on oral CII prescriptions. This flow chart can be accessed [here](#).

DEA is aware that during this pandemic there are obstacles to practitioners meeting with their existing patients and providing these patients with written prescriptions for schedule II controlled substances. As a result, practitioners and pharmacists have asked DEA to clarify the circumstances under which oral schedule II prescriptions are permitted. The DEA has provided the following guidance on this topic and announces temporary exceptions. This guidance has been posted to the Board's website and can be [accessed here](#).

Please be advised that the State of Ohio Board of Pharmacy, pursuant to a Board resolution adopted on March 2, 2020, hereby authorizes the exceptions in the [DEA Guidance](#) for the duration of the Public Health Emergency or unless modified/withdrawn by DEA.

For more information on the DEA's response to COVID-19, visit: <https://www.deadiversion.usdoj.gov/coronavirus.html>

Emergency Rules for Dispensing Chloroquine and Hydroxychloroquine

On March 22, 2020, Governor Mike DeWine authorized the State of Ohio Board of Pharmacy to file emergency rule 4729-5-30.2 of the Administrative Code that places limits on dispensing chloroquine and hydroxychloroquine. **IMPORTANT REMINDER:** The rule only applies to prescriptions that are dispensed for outpatient use.

To assist licensees in complying with this rule, the Board has developed the following frequently asked questions document: www.pharmacy.ohio.gov/COVIDrx



Practicing Pharmacy in a Safe and Effective Manner - Mandatory Requirements

On March 22, 2020 (and revised on April 2, 2020), Ohio Department of Health Director, Dr. Amy Acton, issued a Director's Order to Stay at Home. This order permits individuals to leave their residence to work for or obtain services through a healthcare and public health operation. A copy of the amended order may be reviewed [here](#).

This order does implement additional requirements that pharmacies are required to comply with in order to remain open. The Board's infection control guidance document has been updated to reflect those requirements. This document can be accessed by visiting: www.pharmacy.ohio.gov/COVIDsafe.

Board Office Hours

In order to help contain the spread of the coronavirus (COVID-19), the State of Ohio Board of Pharmacy has closed its offices to the general public and Board staff will be working remotely until further notice. Please be advised that it may take longer than usual to receive a response.

If you need to contact the Board for any reason, please use the [Contact Us](#) form on our website. A member of our staff will reply to your email as soon as possible. Licensees may also contact their assigned Board field staff member.

For emergencies during non-business hours (8 am – 5 pm), the Board's emergency line is still available by calling the main office number 614-466-4143.

COVID-19 Waivers and Guidance for Licensees

Waiver Issue Date	Descriptions
3/13/2020	Authorized the practice of remote order entry for all licensed/registered pharmacy personnel (pharmacists, pharmacy interns, and technicians). The guidance can be accessed here .
3/14/2020 – UPDATED 3/30/2020	Authorized the compounding and sale of certain alcohol-based hand sanitizer products by Ohio-licensed pharmacies and outsourcing facilities. This guidance can be accessed here .
3/14/2020	Authorized licensees conducting sterile compounding to reuse certain personal protective equipment (PPE). This guidance can be accessed here .
3/16/2020	Authorized automatic exemptions to rule authorizing the compounding of drugs in shortage (4729-16-10) and expands the definition of drug shortage. This guidance can be accessed here .
3/16/2020	Authorized the extension of emergency refills. This guidance can be accessed here .
3/16/2020 – UPDATED 3/26/2020	Authorized pharmacists, pharmacy interns, and pharmacy technicians licensed in other states to work in Ohio pharmacies under certain conditions. This guidance can be accessed here .
3/16/2020 – UPDATED 3/26/2020	Authorized expedited onboarding of pharmacy technician trainees. This guidance can be accessed here .
3/16/2020 – UPDATED 3/31/2020	Authorized an extension of the renewal date for registered pharmacy technicians and automatic technician trainee extensions. This guidance can be accessed here .
3/18/2020	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. This guidance can be accessed here .
3/18/2020	Authorized home delivery of medications by opioid treatment programs under specific conditions. This guidance can be accessed here .
3/18/2020	Authorized an extension of basic life-support training certifications for pharmacists and pharmacy interns. This guidance can be accessed here .
3/18/2020	Authorized prescribers to delegate personally furnishing non-controlled drug samples to nurses licensed in accordance with Chapter 4723. of the Revised Code. This guidance can be accessed here .
3/18/2020 – UPDATED 3/20/2020	Authorized the temporary expansion of the maximum days' supply permitted under rule 4729-9-23 of the Administrative Code from 31 days to 60 days. This guidance can be accessed here .

3/20/2020	Authorized licensees to perform sterile compounding for another licensee, referred to as central compounding. This guidance can be accessed here .
3/20/2020	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. This guidance can be accessed here .
3/24/2020	Authorized an extension of drug distributor customer due diligence requirements pursuant to paragraph (G) of rule 4729:6-3-05 of the Administrative Code. This guidance can be accessed here .
3/24/2020	Authorized expedited licensure of drug distributors. This guidance can be accessed here .
3/24/2020	Authorized the sale and shipment of non-reportable dangerous drugs that are in shortage by unlicensed, out-of-state facilities. This guidance can be accessed here .
3/31/2020 – FAQ UPDATED 4/3/2020	Authorized the use of temporary satellite locations for the storage and use of dangerous drugs during COVID-19. This guidance can be accessed here .
3/31/2020	Authorized a temporary extension of the annual controlled substance inventory requirements pursuant to rule 4729:5-3-07 of the Administrative Code. This guidance can be accessed here .
4/3/2020 - NEW	Permits the temporary reinstatement of lapsed or expired Ohio pharmacist licenses in Ohio under certain conditions. This guidance can be accessed here .

Licensees seeking waivers to Ohio laws and regulations governing the practice of pharmacy or distribution of dangerous drugs due to COVID-19 can submit a request to: compliance@pharmacy.ohio.gov. Please include a detailed justification for the waiver request and the expected time period.

Important COVID-19 Reminders

Notification of Closures or Reduction in Hours

- As a reminder, pharmacies and other terminal distributors of dangerous drugs are not required to submit notification to the Board for any temporary closures or reduction in operating hours. If modifying hours of operation, a pharmacy is required to update signage to reflect the change in store hours.

Pharmacist Authority to Administer Injectable Drugs

- Section 4729.45 of the Ohio Revised Code and rule [4729-5-40](#) of the Ohio Administrative Code authorizes a pharmacist to administer, by injection, certain dangerous drugs as long as the drug that is to be administered has been prescribed by a physician and the individual to whom the dangerous drug was prescribed has an ongoing relationship with the physician, an advanced practice registered nurse practicing who has entered into a standard care arrangement with the physician, or a physician assistant who has entered into a supervision agreement with the physician. Guidance for pharmacists can be accessed [here](#).

Delivery Services

- Pharmacies are permitted to use couriers and other delivery services (i.e. United States postal service or common or contract carrier) to deliver patient medications. Be advised that pharmacies seeking to return drugs to stock shelves that cannot be delivered to the patient are required to have policies and procedures in place pursuant to paragraphs (B)(6) and (B)(8) of rule [4729-5-14](#) of the Administrative Code.
- Additionally, nothing in rule or law prohibits using technicians, interns or support personnel to deliver medications to patients waiting at the store (ex. for curbside pickup).

Providing Services at Alternate Locations

- Pharmacies and other locations licensed as terminal distributors of dangerous drugs can provide services outside of the pharmacy as long as they are on the physical premises of the licensed location (i.e. setting up temporary drive-thru to limit pharmacy personnel exposure, offering immunizations at another location in the store, etc.).
- Pharmacies are reminded that any drugs removed from the pharmacy to provide additional on-site services must be under the supervision of a pharmacist to deter and detect possible diversion. **NOTE:** This does not apply to dispensed medications that are being provided to patients by pharmacy technicians, interns or support personnel (for example, for curbside pickup or temporary drive thru).
- If seeking to provide services off-site (except for delivery) involving drugs, please refer to the temporary off-site requirements in rule [4729:5-3-13](#) of the Administrative Code.

Use of Signatures for Prescription Pick-Up

- Please be advised that the use of signatures for picking up a prescription is not required by Board of Pharmacy rules. For patient counseling, a verbal offer or providing an offer to counsel in writing (i.e. a telephone number where a pharmacist may be reached) is required under the [patient counseling rule](#).

Administration of Testing

- Currently, pharmacists, pharmacy interns, and certified technicians are authorized to administer CLIA-waived testing (OAC [4729:1-3-01](#), OAC [4729:2-3-05](#), and OAC [4729:3-3-05](#)).
- Additional guidance for COVID-19 testing will be forthcoming with the increased availability of testing.

Combining Refills

- Section [4729.40](#) of the Revised Code authorizes a pharmacist who is filling or refilling a prescription that has one or more refills to dispense the drug in a quantity or amount that varies from the quantity or amount that would otherwise be dispensed. Guidance can be accessed [here](#).

Emergency Refills

- Ohio law authorizes a pharmacist to dispense medications without a prescription under certain conditions. Updated guidance can be accessed [here](#).

Pharmacist Consult Agreements

- Ohio law authorizes one or more pharmacists practicing under a consult agreement with one or more physicians to (1) manage a patient's drug therapy (including authorizing refills) for specified diagnoses or diseases; and (2) order and evaluate blood and urine tests. Guidance can be accessed [here](#).

Boards of Health – Public Health Emergencies

- The Board has issued the following resolutions that apply to local boards of health during public health emergencies:
 - Temporary Removal of Drugs: The Board authorized a board of health, as defined in section 3701.048 of the Revised Code, that is licensed as a terminal distributor of dangerous drugs to temporarily remove dangerous drugs upon the governor's declaration of an emergency that affects public health. A complete copy of the resolution can be accessed [here](#).
 - Waiver of Wholesale Licensure Requirements: Pursuant to section 4729.25 of the Revised Code, the Board finds it is in the public's interest to waive the drug distributor licensure requirements pursuant to section 4729.52 of the Revised Code for a board of health, as defined in section 3701.048 of the Revised Code, that is licensed as a terminal distributor of dangerous drugs (TDDD) for the purpose of distributing dangerous drugs to another TDDD during a declared public health emergency or emergency preparedness incident. A complete copy of the resolution can be accessed [here](#).

Naloxone Distribution by Mail or Delivery Personnel

- The Board has authorized the distribution of naloxone via mail (or other contract carrier) or delivery personnel. A complete copy of the resolution can be accessed [here](#).