COVID-19 Response Efforts

Updated 4/23/2020

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 new and updated waivers were issued today (see below).

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

Drug Compounding Resolutions and Guidance During COVID-19 – UPDATED 4/23/2020

In recent weeks, the Board has issued several resolutions on drug compounding. To further assist licensees, all compounding resolutions and guidance have been consolidated into a single document. Licensees are advised that several of the Board’s compounding resolutions have been updated to comply with temporary compounding policies issued by the United States Food and Drug Administration (FDA). The Board’s compounding resolutions and guidance document can be accessed by visiting: www.pharmacy.ohio.gov/COVIDcompounding


Due to the COVID-19 pandemic, hospitals and other healthcare facilities may experience shortages of drugs necessary to care for patients. The Board of Pharmacy, in consultation with the Ohio Department of Health, has developed the following guidance to assist hospitals and other healthcare facilities in obtaining drugs that may not be commercially available from manufacturers or wholesalers. This guidance can be accessed by visiting: www.pharmacy.ohio.gov/COVIDshortage.

New and Updated Waivers and Guidance Issued

- **NEW**: Formally adopted FDA’s “Temporary Policy on Repackaging or Combining Propofol Drug Products During the COVID-19 Public Health Emergency” for Ohio-licensed pharmacies, repackagers, and outsourcing facilities. This guidance can be accessed here.
Ohio Launches Toll-Free ‘COVID Careline’ to Provide Emotional Support for Ohioans: 1-800-720-9616

The Ohio Department of Mental Health and Addiction Services (OhioMHAS) today joined with Governor Mike DeWine and RecoveryOhio to launch a new, toll-free Careline to provide emotional support for Ohioans who are experiencing stress, anxiety, fear, sadness and loneliness amid the COVID-19 pandemic. Ohioans may call 1-800-720-9616 to connect with trained counselors for 24/7 support. The Careline is staffed by credentialed counselors who have been trained to provide free, confidential support for a wide range of needs, including mental health concerns, substance use, problem gambling, and more. Individuals experiencing an acute crisis can still reach out to the Ohio Crisis Text Line (keyword 4HOPE to 741 741) or the National Suicide Prevention Lifeline (1-800-273-8255).

Emergency Rules for Dispensing Chloroquine and Hydroxychloroquine – UPDATED FAQS 4/16/2020

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 address certain questions, the Board has issued two additional FAQs to its guidance document (www.pharmacy.ohio.gov/COVIDrx):

**Q4) Am I able to prescribe chloroquine or hydroxychloroquine for other conditions?**

Yes, as long as the prescriber includes a diagnosis code on the prescription. The limitations set forth in rule are only for the off-label prescribing of these medications for COVID-19. Other offlabel uses (e.g. dermatomyositis, cutaneous disease, etc.) are still permitted.

**Q5) Are urgent cares included in the definition of emergency department?**

Emergency department includes emergency departments in hospitals and free-standing emergency departments. It does not include urgent care facilities.

DEA Issues Additional Guidance for Emergency Temporary Sites

The DEA has issued additional guidance for emergency temporary sites, which can be accessed by visiting: https://www.deadiversion.usdoj.gov/coronavirus.html
Licensees that are registering temporary sites with the Board of Pharmacy and the DEA for the use of controlled substances are expected to comply with this guidance.

**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](http://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

<table>
<thead>
<tr>
<th>Waiver Issue Date</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>3/13/2020</td>
<td>Authorized the practice of remote order entry for all licensed/registered pharmacy personnel (pharmacists, pharmacy interns, and technicians). The guidance can be accessed <a href="#">here</a>.</td>
</tr>
<tr>
<td>3/14/2020 – UPDATED 3/30/2020</td>
<td>Authorized the compounding and sale of certain alcohol-based hand sanitizer products by Ohio-licensed pharmacies and outsourcing facilities. This guidance can be accessed <a href="#">here</a>.</td>
</tr>
<tr>
<td>3/14/2020 – UPDATED 4/14/2020</td>
<td>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. This guidance can be accessed <a href="#">here</a>.</td>
</tr>
<tr>
<td>3/16/2020 – UPDATED 4/23/2020</td>
<td>Authorized automatic exemptions to rule authorizing the compounding of drugs in shortage (4729-16-10) under certain conditions. This guidance can be accessed <a href="#">here</a>.</td>
</tr>
<tr>
<td>3/16/2020</td>
<td>Authorized the extension of emergency refills. This guidance can be accessed <a href="#">here</a>.</td>
</tr>
<tr>
<td>3/16/2020 – UPDATED 3/26/2020</td>
<td>Authorized pharmacists, pharmacy interns, and pharmacy technicians licensed in other states to work in Ohio pharmacies under certain conditions. This guidance can be accessed <a href="#">here</a>.</td>
</tr>
<tr>
<td>3/16/2020 – UPDATED 3/26/2020</td>
<td>Authorized expedited onboarding of pharmacy technician trainees. This guidance can be accessed <a href="#">here</a>.</td>
</tr>
<tr>
<td>3/16/2020 – UPDATED 3/31/2020</td>
<td>Authorized an extension of the renewal date for registered pharmacy technicians and automatic technician trainee extensions. This guidance can be accessed <a href="#">here</a>.</td>
</tr>
<tr>
<td>3/18/2020</td>
<td>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 <a href="#">here</a>.</td>
</tr>
<tr>
<td>3/18/2020</td>
<td>Authorized home delivery of medications by opioid treatment programs under specific conditions. This guidance can be accessed <a href="#">here</a>.</td>
</tr>
<tr>
<td>3/18/2020</td>
<td>Authorized an extension of basic life-support training certifications for pharmacists and pharmacy interns. This guidance can be accessed <a href="#">here</a>.</td>
</tr>
<tr>
<td>3/18/2020 – UPDATED 4/14/2020</td>
<td>Authorized prescribers to delegate personally furnishing non-controlled drugs to nurses licensed in accordance with Chapter 4723. of the Revised Code. This guidance can be accessed <a href="#">here</a>.</td>
</tr>
<tr>
<td>Date</td>
<td>Actions</td>
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<tr>
<td>3/18/2020</td>
<td>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.</td>
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<tr>
<td>3/20/2020</td>
<td>Authorized licensees to perform sterile compounding for another licensee, referred to as central compounding.</td>
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<tr>
<td>3/20/2020</td>
<td>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.</td>
</tr>
<tr>
<td>3/24/2020</td>
<td>Authorized an extension of drug distributor customer due diligence requirements pursuant to paragraph (G) of rule 4729:6-3-05 of the Administrative Code.</td>
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<tr>
<td>3/24/2020</td>
<td>Authorized expedited licensure of drug distributors.</td>
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<tr>
<td>3/24/2020</td>
<td>Authorized the sale and shipment of non-reportable dangerous drugs that are in shortage by unlicensed, out-of-state facilities.</td>
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<tr>
<td>3/31/2020</td>
<td>Authorized the use of temporary satellite locations for the storage and use of dangerous drugs during COVID-19.</td>
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<tr>
<td>3/31/2020</td>
<td>Authorized a temporary extension of the annual controlled substance inventory requirements pursuant to rule 4729:5-3-07 of the Administrative Code.</td>
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<td>4/3/2020</td>
<td>Permits the temporary reinstatement of lapsed or expired Ohio pharmacist licenses in Ohio under certain conditions.</td>
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<tr>
<td>4/7/2020</td>
<td>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.</td>
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<tr>
<td>4/7/2020</td>
<td>Authorized pharmacists, pharmacy interns, and certified pharmacy technicians to conduct FDA-authorized COVID-19 testing under certain conditions.</td>
</tr>
<tr>
<td>4/9/2020</td>
<td>Authorized the delegation to an Ohio-licensed APRN who is designated as a certified nurse practitioner (CNP), clinical nurse specialist (CNS), certified nurse midwife (CNM) or physician assistant (PA) the management of a consult agreement authorized under section 4729.39 of the Revised Code.</td>
</tr>
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</table>
4/14/2020  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. This guidance can be accessed here.

4/14/2020  Authorized 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). This guidance can be accessed here.

4/17/2020  Formally adopted FDA’s “Temporary Policy for Compounding of Certain Drugs for Hospitalized Patients by Outsourcing Facilities During the COVID-19 Public Health Emergency” for Ohio-licensed outsourcing facilities. This guidance can be accessed here.

4/17/2020  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. This guidance can be accessed here.

4/17/2020  Extends recertification of primary and secondary engineering controls in accordance with guidance issued by USP. This guidance can be accessed here.

4/23/2020 - NEW  Formally adopted FDA’s “Temporary Policy on Repackaging or Combining Propofol Drug Products During the COVID-19 Public Health Emergency” for Ohio-licensed pharmacies, repackagers, and outsourcing facilities. 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**

**Compounding and Preparing Fit Test Solutions for PPE**

- The Board has received several inquiries regarding the ability of pharmacies to prepare fit-test solutions for personal protective equipment. As these solutions are not considered dangerous drugs, pharmacies are permitted to compound these solutions, as long as they comply with the OSHA requirements set forth in Appendix A to §1910.134, which can be accessed here.

**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, pharmacy staff (including support staff), 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 can be accessed here.

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](#).