



Use of Key Boxes by First Responders to Obtain Access to a Pharmacy

Updated 12/19/2023

It has come to the Board's attention that some fire departments around the state are utilizing "key boxes" on structures that are occupied by Ohio-licensed pharmacies. The key boxes have been placed at these locations to give immediate access to the pharmacy when it is necessary for use in emergency situations.

Please be advised that the use of key boxes conflicts with the following Ohio laws and rules governing the supervision and control of dangerous drugs in a pharmacy:

ORC 4729.27- Pharmacist must be in full and actual charge of pharmacy.

...any pharmacist who owns, manages, or conducts a pharmacy shall be personally in full and actual charge of the pharmacy, or shall employ another pharmacist to be in full and actual charge of the pharmacy.

ORC 4729.55- Terminal distributor license requirements.

(B) A pharmacist...will maintain supervision and control over the possession and custody of dangerous drugs...

(C) Adequate safeguards are assured to prevent the sale or other distribution of dangerous drugs by any person other than a pharmacist...

OAC 4729:5-5-23 - Security, control, and storage of dangerous drugs in an outpatient pharmacy.

(c) Only a licensed pharmacist may have access to keys or other methods of gaining access to the pharmacy.

(i) Keys to the pharmacy that are not in the possession of a licensed pharmacist that are maintained on-site shall be secured to prevent unauthorized access.

(ii) All combinations or access codes, including alarm codes, shall be changed upon termination of employment of an employee having knowledge of the combination or access code.

Please be advised that if your pharmacy does not secure dangerous drugs in its possession in a physical space or cabinet that can only be accessed by a pharmacist, and you are utilizing a key box system, you must discontinue the use of such a system. The pharmacy key must be removed from the key box and returned to the pharmacy's responsible person immediately.

Should you have any questions or concerns, please contact the Ohio Board of Pharmacy by visiting: www.pharmacy.ohio.gov/contact.