

OHIO BOARD OF PHARMACY

*Newsletter to Promote Pharmacy
and Drug Law Compliance.*

From the Director's Desk

Dear Ohio Pharmacists,

Section 4729.45 of the Ohio Revised Code (ORC) and recent updates to rule 4729:1-3-03 of the Ohio Administrative Code (OAC) (effective January 7, 2026) authorize a pharmacist to administer, by subcutaneous or intramuscular injection, any of the following dangerous drugs, as long as the drug that is to be administered has been prescribed by a physician, certified nurse-midwife, clinical nurse specialist, or certified nurse practitioner; is administered in accordance with a prescriber-authorized protocol; and the individual to whom the drug was prescribed has an ongoing physician-patient or nurse-patient relationship with the physician or nurse:

- An addiction treatment drug administered in a long-acting or extended-release form, which may include any medication indicated for relapse prevention

(Note: This includes the administration of controlled substances [eg, buprenorphine] used to treat addiction in a long-acting or extended-release form.)

- An antipsychotic drug administered in a long-acting or extended-release form
- A human immunodeficiency virus treatment or prevention drug administered in a long-acting or extended-release form
- Hydroxyprogesterone caproate for pregnant women
- Medroxyprogesterone acetate for non-pregnant women
- Cobalamin (including the administration of cyanocobalamin, hydroxocobalamin, or any other Food and Drug Administration-approved B12 injection)
- Antibiotics

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From the Director's Desk

(cont)

- Denosumab or romosozumab
- Methotrexate for non-emergent conditions
- Heparin, low molecular weight heparin, and factor Xa inhibitors

For questions regarding pharmacist administration of injectable medications, take a moment to review the frequently asked questions (FAQs) document at www.pharmacy.ohio.gov/administration. If you need

additional information, the most expedient way to have your questions answered is to email the Board office by visiting <https://www.pharmacy.ohio.gov/contact.aspx>.

Thank you for all that you do to keep Ohioans safe and healthy.

Sincerely,

Steven W. Schierholt, Esq
Executive Director
Ohio Board of Pharmacy

Electronic Positive Identification Requirements Effective January 15, 2027

Effective January 15, 2027, amendments to [OAC 4729:5-5-04](#) require, with limited exceptions, that all Ohio outpatient pharmacies adopt electronic positive identification as part of the pharmacy's record-keeping system. This means that once effective, the rule will not permit the use of hard-copy records and manual signatures to capture positive identification, except for the following:

- compounding and the dispensation of compounded drugs; and
- ancillary services, as defined in [OAC 4729:5-5-02.1](#).

Important: This change does not impact institutional pharmacies (except those that operate outpatient pharmacies), nonresident pharmacies, and other terminal distributors (emergency medical services [EMS], clinics, opioid treatment programs, etc). To review the upcoming amendments to the rule, visit www.pharmacy.ohio.gov/positivelDchange.

Waiver Request Process

A waiver of the requirement for electronic positive identification may be granted by the Board upon written request of an outpatient

pharmacy. All requests must be submitted in writing using this [form](#).

Note: The Ohio Board of Pharmacy reserves the right to request additional information and documentation to render a decision as to whether to grant a waiver. Waivers will be granted on a limited basis, and requests that do not include all the required information will not be reviewed by Board staff.

10 Common Prescriber Clinic and Med Spa Violations

Since the beginning of 2025, the Board has **summarily suspended** more than 30 clinics and medical spas (med spas) after determining there is clear and convincing evidence they pose a danger of immediate and serious harm to others.

To educate current and future licensees, the Board developed this **guidance**, which highlights 10 common violations identified at prescriber clinics and med spas.

These examples come directly from citations issued by the Board. To review these citations in detail, visit www.pharmacy.ohio.gov/Suspend.

Questions?

If you have any questions about the operation of your licensed location, please do not hesitate to reach out to the Board by email (contact@pharmacy.ohio.gov) or by phone (614/466-4143). We have a

pharmacist on duty Monday-Friday during normal business hours to assist you with any questions or concerns.

Current licensees are also encouraged to contact their local Board inspector. If you do not have that contact information, please call the Board office (614/466-4143) and ask to speak with the Compliance and Enforcement department.



Updated Rules for EMS Organizations

On December 1, 2025, updates to the Board's rules for EMS organizations went into effect.

To review these changes, use the links below:

- [4729:5-14-01 – Emergency medical services - definitions \(AMEND\)](#)
- [4729:5-14-02 – Licensure \(AMEND\)](#)
- [4729:5-14-03 – Security and control of dangerous drugs \(NEW – REPLACED PREVIOUS RULE\)](#)
- [4729:5-14-04 – Record keeping \(AMEND\)](#)
- [4729:5-14-05 – Protocols and verbal orders for drug administration \(NEW\)](#)

EMS Inspection Guide and FAQ Released

To assist licensees in complying with these rule updates, the Board developed a comprehensive inspection guide and FAQ document, which can be accessed [here](#). This guide aligns with internal guidance used by Board inspectors and allows licensees to conduct self-inspections to maintain compliance. This guide replaces the previous EMS FAQ document.

Questions?

For questions regarding the rule updates, licensees can email the Board office by visiting <https://www.pharmacy.ohio.gov/contact.aspx>.

Registered Pharmacy Technician Renewal and Continuing Education Requirements

Registered pharmacy technician renewal opened at the end of January 2026. Registered technicians received an email in January indicating the open renewal period.

As part of the renewal process, a registered pharmacy technician will be required to complete a total

of **10 contact hours** (1.0 CEUs) of continuing pharmacy education (CPE) between April 1, 2024, and March 31, 2026.

All registered pharmacy technicians must obtain a **free CPE Monitor® account** from the National Association of Boards of Pharmacy®. This account will

be used to report and monitor the successful completion of Accreditation Council for Pharmacy Education-accredited CPE.

For more information and a list of FAQs, visit www.pharmacy.ohio.gov/techrenewal2025.

Reminder: Licensure Requirements for Investigational New Drug Products

The Board reminds licensees that effective February 4, 2026, any entity engaged in Phase 2 or Phase 3 clinical trials involving

an investigational new drug must obtain Ohio licensure as a terminal distributor of dangerous drugs (TDDD).

For more information on these licensure requirements, the Board developed this [guidance document](#).

Immunization Guidance Updates

The Board recently updated its pharmacist, pharmacy intern, and pharmacy technician immunization guidance documents:

- [Immunizations by Pharmacists and Pharmacy Interns](#)
- [Immunizations by Registered or Certified Pharmacy Technicians](#)

Note: All COVID-19 immunization information was consolidated into the guidance documents above.

As a reminder, updates to ORC 4729.41 (effective May 13, 2021) removed requirements to adhere to recommendations from the Advisory Committee

on Immunization Practices. Pharmacists, interns, and technicians must still comply with the requirements set forth in their prescriber-established protocol.

Board Releases FY 2025 Annual Report

The Board has released its *FY 2025 Annual Report*. The report can be accessed [here](#).

Reminder: Verify Your Seller – It's the Law

The Board continues to be concerned with reports and investigations of clinics and other licensees purchasing counterfeit drugs for administration to patients. All pharmacies, clinics, and other health care facilities, even those not licensed by the Ohio Board of Pharmacy, are required by law to purchase from licensed drug distributors (such as wholesalers, manufacturers, and outsourcing facilities) and, with limited exceptions, pharmacies.

To ensure that a TDDD is purchasing from an authorized seller, [OAC 4729:5-3-04](#) requires the TDDD to verify that the seller is licensed by the Board prior to the

initial purchase and annually thereafter. Verification should be conducted using [Ohio's eLicense system](#) and must be documented by the licensee (eg, saving the license verification electronically from eLicense).

As a reminder, licensees **cannot** purchase drugs from the following sources:

- Facebook and other social media sites
- Internet sellers, unless they are appropriately licensed with the Board
- Other clinics or prescribers, unless both clinics are under the same ownership

(this would be considered an intracompany transfer – see [OAC 4729:5-3-09](#))

Purchasing from unlicensed sources endangers the health and safety of your patients and is considered a violation of Ohio law. The Board takes such violations seriously and, in doing so, may subject the licensee to administrative action, including [immediate license suspension](#) and/or criminal sanctions.

To assist our licensees in avoiding the purchase of counterfeit medications, the Board developed the following resource: www.pharmacy.ohio.gov/counterfeitpc.

Licensee Scam Warning

The Board continues to learn that licensees are being targeted by scammers who claim to work for various governmental agencies (Board of Pharmacy, Drug Enforcement Administration, Federal Bureau of Investigation, Department of Justice, etc) in attempts to extort money. The Board strongly encourages licensees to be on alert to avoid scammers.

Scammers may try to initiate contact via phone calls, emails, faxes, and letters purporting to originate from various state and

federal agencies that include allegations of drug trafficking and threats of suspension against the target's license.

Board investigators will not ask for fine payment or personal/sensitive information over the phone and will never contact licensees via fax. As a reminder, administrative fines issued by the Board are not paid via gift cards or cryptocurrency. If the Board is investigating and an individual faces action against their license, they will receive an official notice of opportunity for a

hearing either via certified mail or by personal service.

If you are contacted by a scammer, please report this information using the Board's [online complaint form](#). Additionally, reports should be made to your local law enforcement agency.

If you receive any suspicious calls or correspondence purporting to be from the Board, you are encouraged to call (614/466-4143) or email (contact@pharmacy.ohio.gov) the Board to confirm its legitimacy.

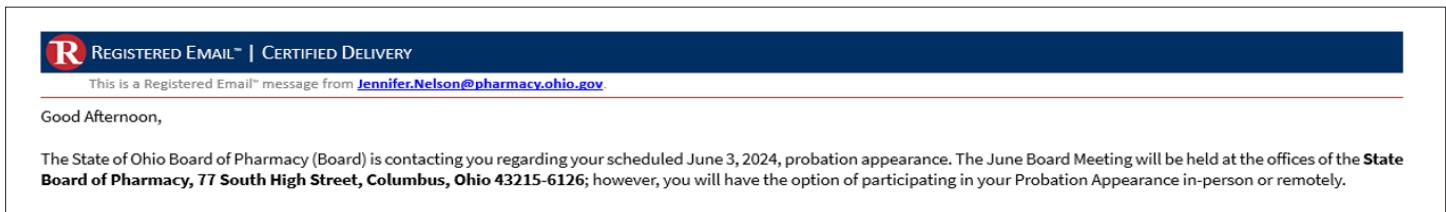
Licensee Scam Warning

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As licensees become more vigilant about looking out for scams, the Board would like to remind all licensees that official electronic

registered mail from the Board of Pharmacy will sometimes have a **Registered Email | Certified Delivery** banner across the top,

like in the image below. Emails with this banner are official correspondence from the Ohio Board of Pharmacy.



REGISTERED EMAIL | CERTIFIED DELIVERY
This is a Registered Email™ message from Jennifer.Nelson@pharmacy.ohio.gov.

Good Afternoon,

The State of Ohio Board of Pharmacy (Board) is contacting you regarding your scheduled June 3, 2024, probation appearance. The June Board Meeting will be held at the offices of the **State Board of Pharmacy, 77 South High Street, Columbus, Ohio 43215-6126**; however, you will have the option of participating in your Probation Appearance in-person or remotely.



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