



## Remote Medication Order and Prescription Processing by Pharmacists

**Updated 6/5/2023**

The following Board of Pharmacy rules permit pharmacists to conduct remote medication order and prescription processing for a licensed pharmacy located within Ohio:

- [Rule 4729:5-9-02.14 | Remote Medication Order Processing](#) (For Institutional Pharmacies)
- [Rule 4729:5-5-20 | Remote Outpatient Prescription Processing](#) (For Outpatient Pharmacies)

***For the purposes of this guidance, remote medication order and prescription processing will be referred to as “remote processing.”***

To assist licensees in complying with these rules, the Board developed a set of frequently asked questions that begins on the next page of this document.

Separate remote processing guidance for pharmacy technicians & pharmacy interns can be accessed here: [www.pharmacy.ohio.gov/ROEtech](http://www.pharmacy.ohio.gov/ROEtech)

If you need additional information, you may e-mail the Board at [contact@pharmacy.ohio.gov](mailto:contact@pharmacy.ohio.gov).

**IMPORTANT:** A pharmacist who is engaged in remote medication order/prescription processing outside the State of Ohio may only do so if authorized in the state where the pharmacist is practicing. Pharmacists should contact their home state licensing agency before engaging in remote medication order/prescription processing for patients in Ohio.

## Frequently Asked Questions

### **Q1) Who needs to be licensed with the Board to conduct remote processing within the state of Ohio?**

**A1)** If conducting remote processing in the state of Ohio, licensees must comply with the following requirements:

- The pharmacist conducting any remote processing in state must be licensed in Ohio.
- The pharmacy utilizing remote processing must be licensed and located in Ohio.

**IMPORTANT:** All pharmacists conducting remote processing must be employed or contracted by the dispensing pharmacy utilizing remote processing or a “remote pharmacy” that is contracted to perform remote processing on behalf of the dispensing pharmacy.

A remote pharmacy means either:

- (a) A pharmacy licensed as a terminal distributor of dangerous drugs that dispenses dangerous drugs; or
- (b) A pharmacy licensed as a limited category II terminal distributor of dangerous drugs that does not stock, own, or dispense any dangerous drugs and whose sole business consists of entry, review, and/or verification of prescriber orders and consulting services under contract for institutional pharmacies in this state.

### **Q2) Who needs to be licensed with the Board to conduct remote processing outside of the state of Ohio?**

**A2)** Those who live outside of Ohio that are conducting remote processing for a licensed pharmacy located in Ohio, must meet the following requirements:

- The pharmacist must be either Ohio licensed or licensed in the state where they are conducting remote activities.

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- The pharmacy utilizing remote processing must be licensed and located in Ohio.

**IMPORTANT:** All employees conducting remote processing must be employed or contracted by the dispensing pharmacy utilizing remote processing or a “remote pharmacy” that is contracted to perform remote services on behalf of the dispensing pharmacy.

A remote pharmacy means either:

- (a) A pharmacy licensed as a terminal distributor of dangerous drugs that dispenses dangerous drugs; or
- (b) A pharmacy licensed as a limited category II terminal distributor of dangerous drugs that does not stock, own, or dispense any dangerous drugs and whose sole business consists of entry, review, and/or verification of prescriber orders and consulting services under contract for institutional pharmacies in this state.

**IMPORTANT:** A pharmacist who is engaged in remote medication order/prescription processing outside the State of Ohio may only do so if authorized in the state where the pharmacist is practicing. Pharmacists should contact their home state licensing Board before engaging in remote medication order/prescription processing for patients in Ohio.

**Q3) What are the licensure requirements for non-resident pharmacies (i.e., those located outside of Ohio) that utilize remote processing?**

**A3)** Those who are engaged in remote processing for a non-resident pharmacy must comply with the pharmacy’s home state requirements.

**Q4) Are Ohio pharmacies permitted to use staff located outside of the U.S. to conduct remote services?**

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**A4)** No. Ohio’s rules require remote processing to be conducted by personnel within the United States, to include the District of Columbia, the Commonwealth of Puerto Rico, or a territory or insular possession subject to the jurisdiction of the United States.

**Q5) Do the rules permit pharmacists to conduct remote services from their homes?**

**A5)** Yes. The rules permit a pharmacist to conduct remote services from a remote site, which may include the pharmacist’s residence or other location where the pharmacist and the dispensing pharmacy or remote pharmacy can ensure the confidentiality and integrity of patient information, or on the premises of a dispensing pharmacy or remote pharmacy.

**Q6) What documentation is necessary to demonstrate that the dispensing pharmacy has contracted with a remote pharmacy to provide remote processing services?**

**A6)** A dispensing pharmacy may outsource remote services to a remote pharmacy provided the pharmacies are under common ownership or control or the dispensing pharmacy has entered into a written contract or agreement with a pharmacy that outlines the services to be provided and the responsibilities and accountabilities of each party to the contract or agreement in compliance with federal and state law, rules, and regulations.

The dispensing pharmacy and remote pharmacy must maintain a copy of the contract or agreement in a readily retrievable manner for inspection and review by an agent, inspector, or employee of the Board.

**NOTE:** If utilizing employees of the dispensing pharmacy’s employees to conduct remote activities (i.e., not employing the services of a remote pharmacy), a contract is not required.

**Q7) What are the training requirements for pharmacists conducting remote processing?**

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**A7)** The responsibility of training pharmacists conducting remote processing falls to the pharmacy utilizing such services (i.e., the dispensing pharmacy). The pharmacy must ensure that all remote pharmacists providing such services have been trained on the dispensing pharmacy's policies and procedures relating to medication order/prescription processing. The training of each pharmacist shall be documented.

The following are the training requirements based upon the type of pharmacy utilizing remote processing:

**Institutional Pharmacies:** Such training shall include, but is not limited to, policies on drug and food allergy documentation, abbreviations, administration times, automatic stop orders, substitution, and formulary compliance. The institutional pharmacy and the remote pharmacy shall jointly develop a procedure to communicate changes in policies and procedures related to medication order processing.

**Outpatient Pharmacies:** Such training shall include, but is not limited to, policies on drug and food allergy documentation, abbreviations, substitution, and prospective drug utilization review requirements in accordance with rule [4729:5-5-08](#) of the Administrative Code. The outpatient pharmacy and the remote pharmacy shall jointly develop a procedure to communicate changes in policies and procedures related to prescription processing.

A pharmacy (either institutional or outpatient) may utilize one training program for all remote pharmacies under the pharmacy's common ownership and control and for all pharmacists employed or under contract with the pharmacy utilizing remote processing.

**Q8) Is a pharmacy utilizing remote processing required to maintain a list of all pharmacists conducting remote processing?**

**A8)** Yes. A pharmacy utilizing pharmacists to conduct remote processing shall maintain or have access to a record of the name and address of each pharmacist, evidence of current pharmacist licensure in the state where the pharmacist is performing remote processing, and

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the address of each location where the pharmacist will be providing remote processing services.

**Q9) What are the system requirements for pharmacists conducting remote processing?**

**A9)** A pharmacy utilizing pharmacists to conduct remote processing shall ensure that the pharmacist conducting remote processing has secure electronic access to the pharmacy's patient information system and to other electronic systems that an on-site pharmacist has access to when the pharmacy is open.

Such systems must comply with OAC [4729:5-3-05](#) (E), which requires compliance with: The Health Insurance Portability and Accountability Act of 1996 (HIPAA) and all state and federal laws, rules, and regulations regarding patient privacy.

Additionally, a remote pharmacist must be able to contact the prescriber issuing a prescription/medication order to discuss any concerns identified during the pharmacist's review of patient information and the prescription/order. A procedure must be in place to communicate any problems identified with the prescriber and the dispensing pharmacy.

**Q10) What are the record keeping requirements for conducting remote processing?**

**A10)** Each remote entry record must comply with all recordkeeping requirements for the pharmacy utilizing remote processing (e.g., outpatient pharmacy or institutional pharmacy), including capturing the positive identification of the remote pharmacist involved in the review and verification of the prescription.

The pharmacy utilizing remote processing is responsible for maintaining records of all orders/prescriptions entered into their information system, including orders/prescriptions entered by a pharmacist performing remote processing. The system shall have the ability to audit the activities of pharmacists conducting remote processing.

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**Q11) Are there any requirements for a pharmacy utilizing remote processing to develop policies and procedures to ensure compliance with Ohio rules?**

**A11)** Yes. A pharmacy utilizing remote processing shall develop and implement a policy and procedure manual. A remote pharmacy shall maintain a copy of those portions of the policy and procedure manual that relate to the remote pharmacy's operations. Each manual shall include all the following:

1. Outline the responsibilities of the pharmacy utilizing remote processing and the remote pharmacy.
2. Include a list of the names, addresses, telephone numbers, and all license numbers of the pharmacies/pharmacists involved in remote processing.
3. Include policies and procedures for:
  - (a) Protecting the confidentiality and integrity of patient information;
  - (b) Ensuring that no patient information is duplicated, downloaded, or removed from the pharmacy's patient information system;
  - (c) Maintaining appropriate records of each pharmacist involved in remote processing;
  - (d) Complying with federal and state law, rules, and regulations;
  - (e) Reviewing written policies and procedures at least every three years, or upon the implementation of a significant change of written policies and procedures, and documentation of the review; and
  - (f) Annually reviewing the competencies of pharmacists providing remote processing services.

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