



NEVADA STATE BOARD OF PHARMACY

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Partial Waiver Regarding Personal Protective Equipment (PPE) in Response to COVID-19

March 25, 2020

Due to the shortage of personal protective equipment (PPE), and to promote patient access to needed prescription medications during the COVID-19 outbreak, the Nevada State Board of Pharmacy has partially waived existing regulations regarding the reuse of PPE in compounding both sterile and nonsterile drugs. *See* NAC 639.67037 and NAC 639.6705.

This partial waiver is being issued in accordance with NAC 639.170.

Persons that may have a higher risk of contaminating the sterile environment should be prevented from entering the sterile environment. Pharmacy staff must maintain proper personal hygiene including hand washing. Staff must strictly adhere to Nevada Law as it relates to sterile compounding.

The following are recommendations for the conservation of PPE:

Staffing models:

- Limit the number of persons entering the segregated compounding area. Maximize the work for those inside by having others stage outside the segregated compounding area.

Face masks:

- If face masks are not available, N95 may be substituted.
- Pouch-type masks, cleanroom-grade masks, and N95 respirators may be more conducive to reuse than simple tie surgical masks.
- If reusing masks, put a process in place around this activity to reduce the risk of compromising the microbial state of control in the segregated compounding area.
- Doff masks on the dirty side of the ante-room or outside the perimeter line of the segregated compounding area.
- Do not touch the inside of the mask.
- When reusing a mask write the initials of the compounder on the outside of the mask.
- Place each mask for reuse in its own new, small white paper bag and initial the outside of the bag.
- If sink is on the clean side of the line of demarcation, then put on mask in the normal garbing order.
- If the sink is located outside of the ante-room or segregated compounding area and a mask is donned after hands are washed, use alcohol-based rub after donning mask.

- Use your best judgement based on the conditions as to how long a mask can be worn before being replaced.
- If a compounding aseptic isolator is used in a segregated compounding area, masks are not required if the device manufacturer can provide written documentation that the mask is not required.
- Face masks, beard covers, and head covers may be reused after hazardous drug compounding if compounding is performed in a containment primary engineering control (C-PEC).

Shoe Covers:

- Reuse of shoe covers or turning them inside out is NOT recommended.
- If shoe covers become unavailable, “facility dedicated” shoes that are stored in a dedicated area within the pharmacy are recommended. Develop a policy for cleaning and disinfecting the “facility dedicated” shoes.

Gowns:

- Reusing gowns based on one gown per shift/day is recommended.
- Reduce number of the compounding personnel that enter the buffer room or inside the perimeter of the segregated compounding area, therefore reducing the number of gowns needed.
- A maximum of 7 days for reuse of gowns is recommended if the product availability becomes critical.
- Gowns must be discarded if visibly soiled or used during cleaning activities.
- If gowns become unavailable, disposable jackets that are a shorter length than a gown may be used IF they cover any clothing that is exposed to the opening of the laminar airflow workbench.
- Hazardous gowns must not be reused.
- Conserve hazardous drug garb for those preparing antineoplastic agents in Table 1 of the NIOSH list.
- Remove gowns slowly and carefully.
- Hang gowns on the clean side of the ante-room.
- Hang gowns far away from the sink.
- Do not turn gowns inside out to hang them.

Hair Covers:

- Hair bouffant can be used one per shirt. If supply becomes unavailable the use of full hoods can be used.

Disposable Sleeves:

- The use of sleeve covers, which do not have to be sterile, is recommended.
- Don sleeves in buffer room or inside perimeter line of the segregated compounding area.
- If there is a shortage of sleeves, consider using sleeves for one shift.

Alcohol-Based Hand Rub:

- See Partial Waiver Authorizing Temporary Compounding of Certain Alcohol-Based Hand Sanitizer Products in Response to COVID-19 issued March 15, 2020.

Sterile Gloves:

- In the event sterile gloves become unavailable the use of non-sterile gloves can be used with the frequent application of alcohol-based hand sanitizer or 70% SIPA. Non-sterile gloves should be nitrile, latex, or vinyl.

Pharmacies must otherwise comply with all applicable standards for compounding sterile and nonsterile products. Those standards are set forth in chapters 795 and 797 of the *United States Pharmacopeia - National Formulary* (USP 797) and mandated under Nevada law. See NAC 639.670.

NOTE: The Board will not be approving policies, procedures, or technology solutions, but a pharmacy engaged in compounding both sterile and nonsterile hazardous drugs should be able to justify how the policies, procedures, or technology meets the requirements of this partial waiver.

This guidance is in effect until July 15, 2020.

For questions regarding this partial waiver, please e-mail the Board office at pharmacy@pharmacy.nv.gov.

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Executive Secretary
Nevada State Board of Pharmacy