



NEVADA STATE BOARD OF PHARMACY

985 Damonte Ranch Pkwy Suite 206, Reno, Nevada 89521

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Partial Waiver of Remote Site Operation Regulations in Response to COVID-19

March 16, 2020

In order to reduce opportunities for the transmission of COVID-19 and safeguard the health of Nevadans, the Nevada State Board of Pharmacy has partially waived existing regulations on remote site operation to permit pharmacy professionals (pharmacists, pharmacy interns, and technicians) to process prescriptions and medication orders from remote sites. *See* NAC 639.391-.399.

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

For the purposes of this partial waiver, "remote processing" means the remote processing of a prescription for a licensed pharmacy.

For pharmacists, remote processing does not include the dispensing of a drug, but may include receiving, interpreting, evaluating, clarifying, and approval of prescriptions. Additionally, remote processing may include order entry, other data entry, performing prospective drug utilization review, interpreting clinical data, insurance processing, performing therapeutic interventions, providing drug information services, and authorizing release of medication for administration.

For pharmaceutical technicians, pharmaceutical technicians in training, and intern pharmacists, remote processing does not include the dispensing of a drug, but may include prescription or order entry, other data entry, insurance processing, and clarifying prescriptions and medication orders.

Pharmacy and Pharmacist Remote Processing

Pharmacists are permitted to conduct remote processing in accordance with the following:

- If performing remote processing in Nevada: The pharmacist must be a Nevada-registered pharmacist, either employed or a contract employee of a Nevada-licensed pharmacy, who either processes medication orders or prescriptions from a remote site or on the premises of a pharmacy.
- If performing remote processing outside of this state: A pharmacist licensed or registered in the state where the remote processing is occurring, either employed or a contract employee of a Nevada-licensed pharmacy, who either processes medication orders or prescriptions from a remote site or on the premises of a pharmacy.
- A Nevada-licensed pharmacy may engage in remote processing provided the pharmacy has entered into a written agreement or has policies and procedures that outline the services to be provided and the responsibilities and accountabilities of each party. Such agreements or policies and procedures must include methods for protecting the confidentiality and integrity of patient information and must be readily retrievable.



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- A pharmacy utilizing remote processing shall ensure that all pharmacists providing such services have been trained on the pharmacy's policies and procedures relating to medication order or prescription processing.
- A pharmacy utilizing pharmacists to conduct remote processing shall maintain or have access to a record of the name and license number of each pharmacist, evidence of current pharmacist licensure in the state where the pharmacist is performing remote processing, and the address of each location where the pharmacist will be providing remote processing services.
- A pharmacy must ensure that any pharmacist shall have 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.
- Each remote entry record must comply with all record keeping requirements for pharmacies, including capturing the positive identification of the remote pharmacist involved in the review and verification of a medication order or prescription. This may include the use of signed end-of-day reports or logs signed or initialed by the pharmacist engaged in remote processing. End-of-day reports can be generated by the pharmacy, another location (i.e. corporate headquarters), or at the remote entry location. As a reminder, signed end-of-day reports or logs can be scanned and sent to the pharmacy in order to meet the positive identification requirements.
- A pharmacy utilizing remote processing is responsible for maintaining records of all medication orders and prescriptions entered into the pharmacy's information system.

Intern Pharmacist and Pharmaceutical Technician Remote Processing

“Direct supervision” and “personal supervision” requirements for intern pharmacists and pharmaceutical technicians is now expanded to include the following:

A pharmacist may provide direct or personal supervision of intern pharmacists and pharmaceutical technicians conducting remote processing via technological means. If using technology, the pharmacy must have documented policies and procedures and other adequate safeguards to protect against patient harm and privacy incidents. A pharmacist providing personal supervision for remote processing via technology shall: (1) Be readily available to answer questions of an intern pharmacist or pharmaceutical technician; and (2) Be fully responsible for the practice and accuracy of the intern, technician or technician trainee.

NOTE: The Board will not be approving technology solutions, but the pharmacy engaged in remote processing should be able to justify how the technology meets the requirements of this guidance.



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Intern pharmacists and pharmaceutical technicians are permitted to conduct remote processing in accordance with the following:

- If performing remote processing in Nevada: The intern pharmacist or pharmaceutical technician must be licensed or registered with the Board, either employed or a contract employee of a Nevada-licensed pharmacy, who either processes prescriptions from a remote site or on the premises of a pharmacy.
- If performing remote prescription processing outside of this state: An intern pharmacist or pharmaceutical technician licensed or registered in the state where the remote processing is occurring, either employed or a contract employee of a Nevada-licensed pharmacy, who either processes prescriptions from a remote site or on the premises of a pharmacy.
- A Nevada-licensed pharmacy may engage in remote processing provided the pharmacy has entered into a written agreement or has policies and procedures that outlines the services to be provided and the responsibilities and accountabilities of each party. Such agreements or policies and procedures must also include methods for protecting the confidentiality and integrity of patient information and must be readily retrievable.
- A pharmacy utilizing remote processing shall ensure that all intern pharmacists and pharmaceutical technicians providing such services have been trained on the pharmacy's policies and procedures relating to prescription processing.
- A pharmacy utilizing interns and technicians to conduct remote processing shall maintain or have access to a record of the name and license/registration number of each intern/technician, evidence of current licensure/registration in the state where the intern/technician is performing remote processing, and the address of each location where the intern/technician will be providing remote processing services.
- A pharmacy shall ensure that any intern or technician shall have secure electronic access to the pharmacy's patient information system and to other electronic systems that an on-site intern or technician has access to when the pharmacy is open.
- Each remote entry record must comply with all recordkeeping requirements for pharmacies.
- A pharmacy utilizing remote processing is responsible for maintaining records of all prescriptions entered into the pharmacy's computer system.



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This guidance is in effect until April 10, 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