



# Louisiana Board of Pharmacy

3388 Brentwood Drive  
Baton Rouge, Louisiana 70809-1700  
Telephone 225.925.6496 ~ E-mail: [info@pharmacy.la.gov](mailto:info@pharmacy.la.gov)



## MEMORANDUM

To: Hospital Pharmacies

From: Malcolm J Broussard, Executive Director

Date: March 17, 2020

Re: COVID-19 Guidance Information ~ Extra Storage Space; Centralized Compounding Capacity; Outpatient Dispensing

---

In addition to the standing rule [§1527, on page 251 of the *Louisiana Pharmacy Law Book*] which permits hospital pharmacies to allow their pharmacists to remotely access medical orders and prescriptions in their dispensing information system, the Board President has determined it appropriate to make the following allowances, for the duration of the public health emergency:

In the event a hospital pharmacy needs additional storage space for prescription drugs (which includes IV solutions) beyond the declared space for its pharmacy permit, then the PIC shall notify the Board office in writing (email or fax), and further, the PIC shall ensure the requested space provides for the security and environmental integrity of the drug products stored therein, subject to the following:

- If the requested space is located within the building licensed as a hospital by the Dept. of Health, no inspection is required by the Board's compliance officer; OR
- If the requested space is located outside the building licensed as a hospital by the Dept. of Health, AND
  - The requested space is licensed by the Dept. of Health in a different capacity, e.g., a warehouse permit from the Food & Drug Unit of the Dept. of Health, and that space has been inspected by the state within the previous 18 months, then no inspection is required by the Board's compliance officer; OR
  - The requested space is not licensed by the Dept. of Health in any capacity, then the PIC shall contact their Board compliance officer for an inspection of the space prior to using that space for storage of their drugs.

In the event a health system with multiple hospital pharmacies elects to conserve resources such as PPE and healthy staff by centralizing their sterile compounding operations in a single pharmacy, then that pharmacy may compound sterile preparations for patients in any hospital of that health system.

---

**NOTICE:** In compliance with Act 256 of the 2019 Louisiana Legislature, the Board gives public notice that any information submitted to the Board may become public record unless specifically exempted by the Public Records Law, R.S. 44:1 *et seq.*

**NOTICE:** In compliance with Act 655 of the 2018 Louisiana Legislature, the Board gives notice to its licensees and applicants of their opportunity to file a complaint about the Board's actions or procedures. You may submit such complaints to one or more of the following: (1) Louisiana Board of Pharmacy; 3388 Brentwood Dr., Baton Rouge, La 70809; 225.925.6496; [info@pharmacy.la.gov](mailto:info@pharmacy.la.gov) (2) Committee on House & Governmental Affairs; La. House of Representatives; PO Box 44486; Baton Rouge, LA 70804; 225.342.2403; [h&ga@legis.la.gov](mailto:h&ga@legis.la.gov) (3) Committee on Senate & Governmental Affairs; La. Senate; PO Box 94183; Baton Rouge, LA 70804; 225.342.9845; [s&g@legis.la.gov](mailto:s&g@legis.la.gov)

We are aware some hospital pharmacies have been requested to dispense limited quantities of prescription drugs to persons not affiliated with their hospital, e.g., homeless persons under quarantine awaiting results of virus testing. §1523 of the Board's rules limits the type of persons to whom a hospital pharmacy may dispense outpatient prescriptions, and it cites federal legislation. While the Board cannot waive federal law, it can waive its own rules.

The Board President has determined it appropriate, for the duration of the public health emergency, to waive the restriction that would ordinarily prevent a hospital pharmacy from dispensing an outpatient prescription to a person not affiliated with the hospital. Hospital pharmacies intending to dispense prescription drugs to outpatients not affiliated with the hospital should consult with their own legal counsel relative to the federal law. Hospitals dispensing prescription drugs to outpatients should adhere to the regular packaging, labeling, and recordkeeping rules for that activity.

---

**NOTICE:** In compliance with Act 256 of the 2019 Louisiana Legislature, the Board gives public notice that any information submitted to the Board may become public record unless specifically exempted by the Public Records Law, R.S. 44:1 *et seq.*

**NOTICE:** In compliance with Act 655 of the 2018 Louisiana Legislature, the Board gives notice to its licensees and applicants of their opportunity to file a complaint about the Board's actions or procedures. You may submit such complaints to one or more of the following: (1) Louisiana Board of Pharmacy; 3388 Brentwood Dr., Baton Rouge, La 70809; 225.925.6496; [info@pharmacy.la.gov](mailto:info@pharmacy.la.gov) (2) Committee on House & Governmental Affairs; La. House of Representatives; PO Box 44486; Baton Rouge, LA 70804; 225.342.2403; [h&ga@legis.la.gov](mailto:h&ga@legis.la.gov) (3) Committee on Senate & Governmental Affairs; La. Senate; PO Box 94183; Baton Rouge, LA 70804; 225.342.9845; [s&g@legis.la.gov](mailto:s&g@legis.la.gov)