



Louisiana Board of Pharmacy
3388 Brentwood Drive
Baton Rouge, Louisiana 70809-1700
Telephone 225.925.6496 ~ E-mail: info@pharmacy.la.gov



MEMORANDUM

To: Licensees & Interested Parties
From: Malcolm J Broussard, Executive Director
Date: March 21, 2020
Re: COVID-19 Guidance ~ Additional Rule Waiver:
Remote Processing by Pharmacy Personnel

Remote Processing by Pharmacy Personnel

In previous guidance, the Board issued an expansion of §1527, a section of the rules for hospital pharmacies which allows a hospital pharmacy to authorize any of their pharmacists to access the pharmacy's dispensing information system for the purpose of processing prescription drug orders. That rule is replicated here:

§1527. Remote Access to Medical Orders

- A. Notwithstanding any provision of rules to the contrary, nothing shall prohibit a Louisiana-licensed pharmacist who is an employee of or under contract with a hospital pharmacy in Louisiana from accessing that pharmacy's dispensing information system from a location other than the pharmacy in order to process prescription drug orders or medical orders, but only when all of the following conditions are satisfied:
1. The pharmacy establishes controls to protect the privacy and security of confidential records;
 2. The pharmacist does not engage in the receiving of written prescription drug orders or medical orders or the maintenance of prescription drug orders or medical orders; and
 3. No part of the pharmacy's dispensing information system is duplicated, downloaded, or removed from the pharmacy's dispensing information system.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1182.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Pharmacy, LR 41:2147 (October 2015).

As indicated in the previous guidance, the Board authorized any pharmacy, for the duration of the public health emergency, to allow any number of its pharmacists to remotely process prescription drugs orders in compliance with the security provisions identified in the rule.

As pharmacies attempt to protect their pharmacy personnel by implementing distancing provisions, we have received requests to allow other pharmacy personnel to work from home and assist in the processing of prescription drug orders remotely.

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 (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 (3) Committee on Senate & Governmental Affairs; La. Senate; PO Box 94183; Baton Rouge, LA 70804; 225.342.9845; s&g@legis.la.gov

For the duration of the public health emergency, the Board has expanded the application of §1527 to include all pharmacy personnel licensed by the Board. This expansion authorizes any pharmacy licensed by the Board to allow any number of its licensed pharmacy personnel to access its dispensing information system from outside the pharmacy, subject to compliance with the three provisions identified in the rule.

In connection with the request for remote practice, we have received questions as to what tasks different pharmacy personnel may perform remotely. The following information is abstracted from the *Louisiana Pharmacy Law Book* relative to scope of practice for interns, technicians, and technician candidates:

Pharmacy Interns

- A pharmacy intern may assist the pharmacist by performing those duties and tasks assigned by the pharmacist while under his supervision, subject to the following restrictions:
 - An intern may not independently supervise pharmacy technicians or pharmacy technician candidates;
 - An intern may not transfer a prescription for a controlled substance;
 - An intern may not administer any medication in the absence of a valid medication administration registration (*MA.xxxxxx – which can be verified at the Board's website*).

Pharmacy Technicians

- A pharmacy technician may assist the pharmacist by performing those duties and tasks assigned by the pharmacist while under his supervision, subject to the following restrictions:
 - A technician may not release a verbal prescription for processing until it is reduced to written form and initialed by the receiving technician and supervising pharmacist.
 - A technician may not interpret prescription orders, but may translate them.
 - A technician may not counsel patients.
 - A technician may not transfer a prescription for a controlled substance.

Pharmacy Technician Candidates

- A pharmacy technician candidate may assist the pharmacist by performing those duties and tasks assigned by the pharmacist while under his supervision, subject to the following restrictions:
 - A technician candidate may not receive verbal initial prescription orders.
 - A technician candidate may not give or receive verbal transfers of any prescription orders.
 - A technician candidate may not interpret prescription orders, but may translate them,
 - A technician candidate may not compound high-risk sterile preparations, as that term is defined by the United States Pharmacopeia (USP).
 - A technician candidate may not counsel patients.

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 (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 (3) Committee on Senate & Governmental Affairs; La. Senate; PO Box 94183; Baton Rouge, LA 70804; 225.342.9845; s&g@legis.la.gov