

Title: COVID-19 Public Health Emergency:  
Restocking Automated Medication Systems

Policy No. I.D.18

Issued: 04-01-2020  
Ratified: 05-27-2020  
Extended: 11-18-2020

- .....
1. The Board office received a request from a pharmacy supplying medications to automated medication systems (AMS) in a nursing home seeking consideration for a variance from the Board's rule which requires the restocking of an AMS to be performed by a pharmacist or by a pharmacy technician. The request indicated the pharmacy was attempting to reduce traffic in the nursing home and enforcing physical distancing requirements.
  
  2. The Board's current rule for restocking an AMS is found at §1217 – *Stocking and Restocking*. The Board had already initiated the promulgation process to amend the entire chapter of rules for automated medication systems, including a proposal to provide additional flexibility in who could restock an AMS in any location outside the pharmacy. The relevant portion of the proposed rule change [from Draft #7] is presented here:
    - A. The stocking and restocking of medications and devices within an automated medication system shall be performed by a pharmacist, or in the alternative, a pharmacy intern, pharmacy technician, or pharmacy technician candidate under the supervision of a pharmacist.
    - B. When the pharmacy employs electronic product verification procedures as described within this Subsection, the stocking and restocking of medications and devices within an automated medication system may be performed by other personnel approved by the pharmacist-in-charge.
    - C. Electronic Product Verification
      1. A bar code verification, electronic verification, or similar verification process which prohibits any human intervention following pharmacist verification of the product may be utilized to assure the correct selection of drugs to be placed into an automated medication system.
      2. The use of a bar code, electronic, or similar verification process shall require an initial quality assurance validation followed by ongoing quality assurance reviews at intervals no greater than 90 days since the previous review, all conducted by a pharmacist.
      3. ~~When a bar code verification, electronic verification, or similar verification process is utilized as specified in the Paragraph, and in the absence of any human intervention in the product selection process, the stocking and restocking functions in systems located either on-site or off-site may be performed by a pharmacy technician without the necessity of direct pharmacist supervision.~~

3. The Board President determined it appropriate to authorize a temporary waiver of the current restriction on who could restock an AMS to allow a pharmacy to comply with the proposed revision of that restriction, and further, such waiver shall operate for the duration of the public health emergency, unless terminated sooner.
  
4. During their November 18, 2020 meeting, the members voted to further extend this policy until February 28, 2021, by which time the regulatory proposal should be promulgated as a Final Rule.