

Title: COVID-19 Public Health Emergency:
Hospital Pharmacies

Policy No. I.D.7

Issued: 03-17-2020
Ratified: 05-27-2020
Extended: 11-18-2020

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1. The Board office received requests from multiple hospital and health-system pharmacies for consideration of three issues:
 - A. Need for additional storage space for prescription drugs and intravenous solutions received in anticipation of increased admissions to hospitals.
 - B. Need to conserve PPE by centralizing sterile compounding activities.
 - C. Need to dispense outpatient prescription drugs to patients not affiliated with the hospital.

 2. The Board President authorized temporary waivers and exceptions as necessary to accomplish the following:
 - A. In the event a hospital pharmacy needs additional storage space for prescription drugs, including 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 either (1) or (2) as described here:
 1. 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.
 2. If the requested space is located outside the building licensed as a hospital by the Dept. of Health, then one of the following applies:
 - a. If 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 by the Board's compliance officer is required.
 - b. If the requested space is not licensed by the Dept. of Health in any capacity, then the PIC shall contact their compliance officer for an inspection of the space prior to using that space for storage of their drugs.
 - B. In the event a health-system with multiple hospital pharmacies elects to conserve PPE and other resources 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.
 - C. Some hospital pharmacies were 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. Section 1523 of the Board's rules limits the type of persons to whom a

hospital pharmacy may dispense outpatient prescriptions. Although that rule cites a federal law and the Board cannot waive federal law, the Board President did authorize a waiver of the Board's rule to permit such dispensing for the duration of the public health emergency.

3. During their November 18, 2020 meeting, the members voted to extend this interim policy until the conclusion of the public health emergency unless terminated sooner.