

Interested Parties:

The Board is seeking stakeholder input on the estimated fiscal impact (costs minus savings) associated with implementation, operation and ongoing compliance related to proposed requirements for Proper Storage of Drugs, Remote Dispensing Site Pharmacies and Telework. We understand that some information you may want to provide could be proprietary; therefore, please note that any information provided becomes a public record.

Fiscal information on any portion of the request below is welcome. Please reply to [pharmacy.rulemaking@bop.oregon.gov](mailto:pharmacy.rulemaking@bop.oregon.gov)<<mailto:pharmacy.rulemaking@bop.oregon.gov>> by October 6, 2021.

Please provide an estimate of fiscal impact associated with compliance, implementation and operation related to Proper Storage of Drugs:

- \* Utilize continuous temperature monitoring device(s) that have a buffered probe (glycol, glass beads, or similar), are centrally located, accurate, calibrated within a plus or minus 0.5°C variance and record the temperature of each drug storage area at least every 15 minutes
- \* Utilize a system that notifies a pharmacist of each temperature excursion in real-time

Please provide an estimate of fiscal impact associated with compliance, implementation and operation of a Remote Dispensing Site Pharmacy:

- \* Utilize a system of telecommunications technologies that enables monitoring, documenting and recording of the delivery of pharmacy services at a remote location by an electronic method which must include the use of audio and video, still image capture, and store and forward.
- \* Utilize technology that allows a pharmacist to authorize, in real-time access for authorized personnel to gain entry into a prescription area of a Remote Dispensing Site Pharmacy.
- \* In order to comply with minimum security methods such as an electronic keypad or other electronic entry system that records the identification of the pharmacist authorizing access, the Certified Oregon Pharmacy Technician accessing the remote site and the date and time of access.
- \* Utilize a surveillance system that includes continuously accessible and recorded two-way audiovisual link between to pharmacies, and provides a clear view of dispensing site entrances, preparation areas, drug storage areas, pick up areas, office areas and publicly accessible areas.
- \* Utilize a shared telepharmacy system, use a camera for verification of prescriptions.
- \* Utilize audio and visual technology that allows the data to be recorded, reviewable and stored.
- \* Utilize technology that allows all telephone audio to be recorded, reviewable and stored.
- \* Utilize technology that allows real-time audio-visual communication to provide counseling or accept the refusal of counseling from a patient.
- \* Utilize technology that allows real-time audio-visual connection between pharmacies that allow a pharmacist to supervise steps related to all steps in compounding medication, including still image capture or store and forward.
- \* Utilize barcode, radio-frequency identification or quick response code technology to record compounded ingredient information.

Please provide an estimate of fiscal impact associated with compliance, implementation and operation

related to utilization of licensees at Telework Sites:

- \* Utilize an Oregon licensed Pharmacist and real-time audio-visual communication to provide counseling or accept the refusal of counseling from the patient.
- \* Utilize a continuous real-time audio-visual connection that has the ability to be recorded, reviewed and stored and have appropriate technology or interface to allow access to information required to complete assigned duties.
- \* Utilize technology that allows all telephone audio to be recorded, reviewable and stored.
- \* Utilize technology that allows and maintains a secure connection to the pharmacy and patient information, configured so that the information is not accessible when there is not an active licensed pharmacist supervising pharmacy personnel or located physically at the work site or any component of the real-time audio-visual connection is not functioning,
- \* Utilize technology that can create records that contain and maintain date, time, personnel identification, patient and pharmacy records from a telework site.
- \* Utilize technology that allows a pharmacist to authorize, in real-time the ability to approve licensed personnel to work at a telework site.

\*Please note that all records and documentation required by the proposed rules must be retained for three years and made available to the board for inspection upon request. Records created at Telework Sites must be stored at the Drug Outlet for at least one year and may be stored, after one year, in a secured off-site location if retrievable within three business days. Records and documentation may be written, electronic or a combination of the two.

Thanks!

Rulemaking Staff

Oregon Board of Pharmacy

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