

July 17, 2020

National Association of Chain Drug Stores (NACDS)
National Community Pharmacists Association (NCPA)
National Grocers Association (NGA)
National Association of Chain Drug Stores
FMI – The Food Industry Association

Re: COVID-19 Testing by Pharmacists

Thank you for your letter dated June 18, 2020. DC Health greatly appreciates the assistance and feedback from our licensees, stakeholders and private partners in addressing the COVID-19 public health emergency. Below are our responses to each of the items you identified.

Pharmacist COVID-19 Testing Authority

DC Health does not differentiate between COVID-19 tests that are FDA “approved” or “authorized”. If a COVID-19 test is authorized under the FDA Emergency Use Authorization (EUA) as well as with the Clinical Laboratory Improvement Act (CLIA), then it would be an acceptable test under the current emergency regulations.

PPE Requirements

The use of PPE is intended for the protection of both patients and providers from COVID-19 under all known circumstances. While your letter specifically identifies “drive-up” testing, there may be new types of tests developed as the understanding of COVID-19 increases. The Department recognizes that different levels of PPE may be appropriate for pharmacists and pharmacy interns who will be more than six (6) feet from patients as opposed to those who will be six (6) feet or closer to patients when performing or observing testing. We anticipate issuing updated guidance to address these differences and eliminate any perceived barriers to pharmacist COVID-19 testing in the District of Columbia.

Pharmacy Technician Participation

DC Health will take this recommendation into consideration for any future regulations or guidance documents. DC Health wants to ensure that pharmacies are well staffed such that patients are able to receive prescriptions and other services in a timely manner.

Testing Categories and Location

DC Health’s primary concern is the public health and safety of patients. As it relates to COVID-19, this includes ensuring proper social distancing in various situations, including COVID testing. While some pharmacies may be large enough to allow for proper social distancing, not all pharmacies have such capabilities. The current regulations are designed to balance the needs for additional testing vs. the public’s health and wellbeing, hence the requirement for outdoor testing and testing by appointment only.

Accessible COVID-19 Testing Services

Unlike current walk-up testing services where staff is only focused on testing, pharmacies provide multiple different services to various patients throughout the day. This presents a difficult scenario for accommodating both testing services and general pharmacy services (e.g., prescription services, patient care, retail services, etc.). Because of this, DC Health continues to require testing by appointment only for pharmacies in a non-institutional setting.

DC Health appreciates your support to both the District and its residents during this public health emergency. We realize that the situation regarding COVID-19 is constantly evolving, with new discoveries happening daily about how best to test and treat for COVID-19. Because of this, DC Health recognizes that regulations may need to change as CDC and DC Health guidance dictates. DC Health will take all recommendations into consideration for any future regulatory or guidance revisions made during this COVID-19 public health emergency.

Thank you again for your letter, and if there is anything else we can assist with please do not hesitate to contact us.

Sincerely,



Dr. Shauna White, PharmD, RPh, MS
Executive Director
District of Columbia Board of Pharmacy

Cc: Dr. Sharon Lewis
Frank Meyers
Dr. Tamara McCants
Carla Williams