



Remote Processing Checklist for use during COVID-19 Public Health Emergency

Updated March 23, 2020

Policies and procedures must include the required information below and be available for review upon request. The policies and procedures must include this document, containing the applicable page number with each description noted. All remote processing functions must comply with all Oregon laws and rules.

Required information: Describe the following for **each** pharmacy (Remote Processing and Dispensing Pharmacy):

1. The prescription order entry, dispensing, or any other remote processes to include details of the responsibilities and services of each pharmacy Page #_____
2. How each prescription drug order is tracked during each step in the filling and dispensing process Page #_____
3. How to ensure that creation and filling of a duplicate prescription order is prevented (ensure that a prescription exists only at one pharmacy at a time) Page #_____
4. How and where records to identify the name, initials or unique identification code, of the individual who performed each function and that pharmacy location are maintained Page #_____
5. How a pharmacist completes and documents a Drug Utilization Review (DUR) on each prescription, new and all refills Page #_____
6. How a pharmacist performs data verification, final verification and documents counseling Page #_____
7. How the PIC maintains security of the pharmacy and pharmacy records Page #_____
8. How staff training is conducted, to include initial and ongoing training Page #_____
9. The Quality Assurance Plan to provide appropriate consistent quality improvement and how errors/issues are evaluated and improvements are documented (to include how errors or irregularities are detected, documented and reviewed for corrective action or process improvement by each pharmacy) Page #_____
10. How patient information is protected and confidentiality is ensured Page #_____

Please note the following:

- Remote processing is expected to occur at a registered pharmacy location unless criteria on pg. 2 are met
- Any deviation may be considered unprofessional conduct and grounds for discipline

Checklist P&Ps AND OTHER REQUIRED RECORDS DO NOT NEED TO BE APPROVED BY OR SENT TO THE OREGON BOARD OF PHARMACY PRIOR TO USE, however NOTIFICATION FOR ANY REMOTE PERSONNEL is REQUIRED (eff. 3/23/2020). Send email notification to pharmacy.board@oregon.gov (subject line: Remote Processing Notification)

If Pharmacist is working remotely at an off-site location, pharmacy must complete pg. 1 and also include the following required documentation for remote processing:

11. Confirmation of a dedicated, secure, non-pharmacy, off-site workspace, which shall be reviewed by outlet and PIC (prior to utilization)

A. Describe how workspace is equipped with the ability for outlet to view home location at any time, via audio/video, real-time connection to provide supervision at all times

- Must include ongoing QA to perform random “check-ins” to ensure patient safety
- Dispensing pharmacy to maintain list of all remote pharmacists and physical locations
*The Oregon Board of Pharmacy maintains the right to inspect the dedicated home workspace at any time.

B. A pharmacy utilizing pharmacists to conduct remote processing shall maintain or have access to a record of the name and license number of each pharmacist, evidence of current pharmacist licensure in the state where the pharmacist is performing remote processing, and the address of each location where the pharmacist will be providing remote processing services.

If a Pharmacy Technician, Certified Oregon Pharmacy Technician, or Pharmacy Intern is working remotely at an off-site location (for prescription order and other data entry or insurance processing) pharmacy must complete pg. 1, Pharmacist section above, and include the following required documentation for remote processing:

12. Confirmation of a dedicated, secure, non-pharmacy, off-site workspace, which shall be reviewed by outlet and PIC (prior to utilization)

A. Describe how workspace is equipped with the ability for outlet to view home location at any time, via audio/video, real-time connection to provide supervision at all times

- Must include ongoing QA to perform random “check-ins” to ensure patient safety
- Dispensing pharmacy to maintain list of all interns and technicians, and physical location (address) of each
*The Oregon Board of Pharmacy maintains the right to inspect the dedicated home workspace at any time.

B. The policies & procedures developed by the pharmacy and maintained documentation must include:

- List of all technicians and interns, the functions being performed, and the supervising pharmacists providing remote supervision (technician and intern functions must be limited to prescription/order entry, other data entry, or insurance processing)
- List of physical locations of all remote technicians and interns, with evidence of active licensure
- Explicit definition of how a pharmacist is providing remote supervision and direction to remote technicians
 - Record of pharmacist, technician or intern responsible for each step in the remote processing
 - Training record for each pharmacist, intern or technician
 - A pharmacist providing personal supervision for remote processing via technology shall:
 - Be readily available to answer questions of a technician or intern; and
 - Be fully responsible for the practice and accuracy of the technician or intern
- Explicit definition of maintenance of security