

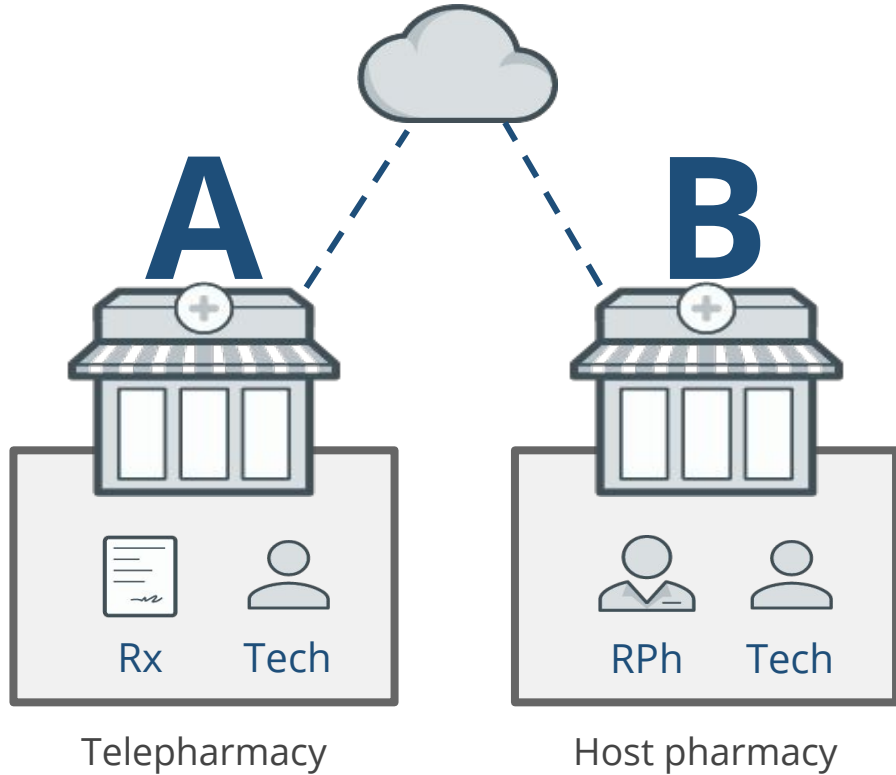
# A Quick Look at Telepharmacy

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# Telepharmacy workflow



-  1 New prescription arrives at **Pharmacy A**
-  2 **Technician A** fills, taking images of the process
-  3 **Pharmacist B** reviews images to verify fill is accurate
-  4 Patient picks up Rx at **Pharmacy A** and **Pharmacist B** counsels

# North Dakota telepharmacy case study

Study conducted from  
2002 - 2008



Medication dispensing  
error rate for  
telepharmacies

**<1.3%**

Compared to a  
national average of:  
**~1.7%**

Result: Positive outcomes, mechanisms could be improved

Information of the  
North Dakota  
Telepharmacy Program  
provided by North  
Dakota State University  
School of Pharmacy

# Patient safety challenges

## 1 out of 3 patients

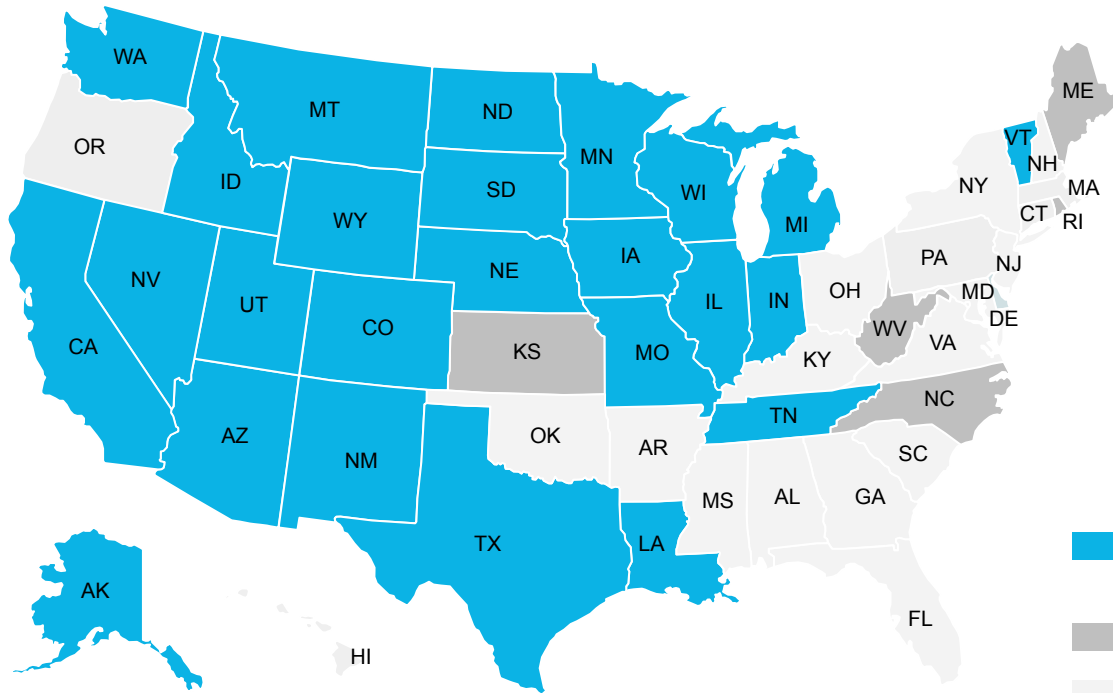
fail to fill their initial prescription leading to an increase in visits to a healthcare professional, hospital readmissions, and healthcare costs.




## 95% of patients

reportedly filled their initial prescription when offered the option at the point of care.

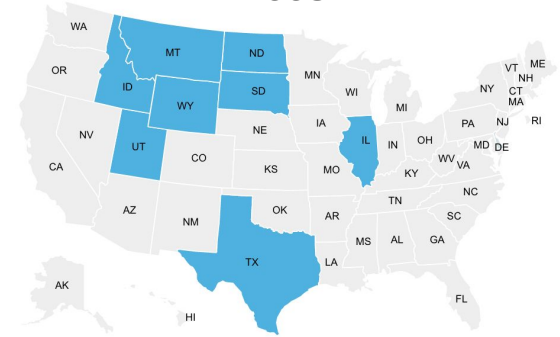
Lack of convenient access to a pharmacy & pharmacist, particularly for the elderly or those in low-income communities, can be a significant barrier to adherence.

# Telepharmacy regulations, 2020



-  Permitted, but practice may be restricted and/or requires Board approval
-  In progress
-  Not permitted

2008



## Use Cases

- Community pharmacy (rural or urban)
- Outpatient hospitals & health system pharmacies
- CHC & FQHC
- Specialty pharmacy
- Mental health centers
- Employer campuses & schools
- Physician's offices
- Emergency preparedness
- And more...






Demo

# Questions

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July 2020

*Overview of  
Telepharmacy Statutes and  
Regulations*



**July 2020**

*Overview of  
Telepharmacy Statutes and  
Regulations*

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## Sources by State

State	Statute	Rule
Alaska	<a href="#">LAW AS 08.80.005, 30,157</a>	<a href="#">12 AAC 52.425</a>
Arizona	<a href="#">32-1961.01.</a>	--
California	<a href="#">AB401</a>	<a href="#">8.4130-4135</a>
Colorado	<a href="#">12-42.5-102(39.5)</a>	<a href="#">14.00.00 &amp; 26.00.00</a>
Iowa	<a href="#">Ch 147.76</a>	<a href="#">657 Chapter 13</a>
Idaho		<a href="#">27.01.01.302</a>
Illinois	<a href="#">225 ILCS 85/25.15</a>	<a href="#">1330.51</a>
Indiana	<a href="#">IC 25-26-13.5 (4-18)</a>	<a href="#">emergency rule 18-325(E)</a>
Louisiana	<a href="#">R.S.§ 37:1182</a>	<a href="#">§2421-2425</a>
Michigan	<a href="#">SB 340</a>	
Minnesota	151.102	<a href="#">rule 6800</a>
Montana	HB 0279	<a href="#">24.174.1302</a>
North Dakota		<a href="#">61-02-08</a>
Nebraska	<a href="#">71-436.02</a>	---
New Mexico	--	<a href="#">NMAC 16.19.33</a>
Nevada	<a href="#">NRS 639.0727, 23277</a>	<a href="#">NAC 639.391-399, 250</a>
South Dakota	<a href="#">36.11.71-72</a>	<a href="#">Ch 20:51:30</a>
Tennessee	<a href="#">T.C.A. § 63-10-601</a>	<a href="#">Ch 1140-13</a>
Texas	<a href="#">562.110</a>	<a href="#">291.121(c)</a>
Utah	<a href="#">58-17b-102</a>	<a href="#">R156-17b</a>
Vermont	<a href="#">26 V.S.A. § 2032.</a>	<a href="#">Part 19</a>
Washington	<a href="#">RCW 34.05.360</a>	<a href="#">WAC-246-945-430</a>
Wisconsin	<a href="#">450.062</a>	<a href="#">Phar 7.095</a>
Wyoming	<a href="#">33.24.156</a>	<a href="#">Ch 14</a>

# Definition of Telepharmacy

## By State:

State	Definition
AK	telepharmacy system is a system under the direct supervision of a licensed pharmacist that monitors the dispensing and distribution of prescription drugs and provides for related drug use review and patient counseling services through a computer link and a video link with sound
AZ	remote supervision by a pharmacist means a pharmacist directs and controls the actions of pharmacy technicians and interns through the use of audio and visual technology
CA	Telepharmacy means a system that is used by a supervising pharmacy for the purpose of monitoring the dispensing of prescription drugs by a remote dispensing site pharmacy and provides for related drug regimen review and patient counseling by an electronic method, including, but not limited to, the use of audio, visual, still image capture, and store and forward technology.
CO	telepharmacy outlet means a remote pharmacy site that is registered as an other outlet; at the time of registration, is located more than twenty miles from the nearest prescription drug outlet and from any other telepharmacy outlet; is connected via computer link, video link, and audio link, or via other functionally equivalent telecommunication equipment, with a central pharmacy and has a pharmacy technician on site who, under the remote supervision of a licensed pharmacist located at the central pharmacy, performs the tasks outlined under the definition of practice as a pharmacy technician
IA	Telepharmacy means the practice of pharmacy where pharmaceutical care services are provided using audiovisual technologies linking a telepharmacy site with the managing pharmacy.
ID	not defined, referred to as drug outlets that dispense drugs to patients without an onsite pharmacist or prescriber
IL	"telepharmacy" means the provision of pharmacist care by a pharmacist that is accomplished through the use of telecommunications or other technologies to patients or their agents who are at a distance and are located within the US, and which follows all federal and State laws, rules, and regulations with regard to privacy and security.

IN	telepharmacy means to provide patient care by a pharmacy and pharmacist licensed under IC 25-26 through the use of telecommunications or other technology: to a patient or the patient's representative who is at a distance and located in a state or jurisdiction of the United States; and where the pharmacy and pharmacist is located in Indiana.
LA	Telepharmacy system: a system that monitors the dispensing of prescription drugs and provides for related drug use review and patient counseling services by an electronic method which shall include the use of the following types of technology: audio and video; still image capture; and store and forward
MI	Telepharmacy system means an interoperable computer system that shares real-time data and uses a real-time audio and video link to connect a pharmacist at a parent pharmacy with a remote pharmacy; and uses a camera that is of sufficient quality and resolution to allow a pharmacist at a parent pharmacy to visually identify the markings on tablets and capsules at the remote pharmacy.
MN	not defined in law or rule (board has a guidance document only, applicants must apply for variance requests)
MT	Practice telepharmacy means to provide pharmaceutical care through the use of information technology to patients at a distance.
ND	Telepharmacy means a central pharmacy with one or more remote sites in which all sites are connected via computer link, videolink, and audiolink.
NE	Telepharmacy means the provision of pharmacist care, by a pharmacist located within the United States, using telecommunications, remote order entry, or other automations and technologies to deliver care to patients or their agents who are located at sites other than where the pharmacist is located.
NM	"Practice of tele-pharmacy" means the provision of pharmacist care by board licensed pharmacies and board licensed pharmacists through the use of telecommunications or other technologies to patients or their agents at a remote tele-pharmacy site.
NV	Telepharmacy means: a pharmacy; or an office of a dispensing practitioner, that is accessible by a remote site or a satellite consultation site electronically, telephonically or by fiber optics, including, without limitation, through telehealth, from within or outside this State or the United States.
SD	"Telepharmacy practice" the practice whereby a licensed pharmacist uses telecommunications technology to provide personalized, electronically documented, real-time pharmaceutical care to patients at a remote pharmacy, including prescription dispensing and counseling, and to oversee and supervise remote pharmacy operations
TN	"Telepharmacy" means the method of providing pharmaceutical services through a remote site connection between a central pharmacy and a satellite clinic.

TX	Telepharmacy system--A system that monitors the dispensing of prescription drugs and provides for related drug use review and patient counseling services by an electronic method which shall include the use of the following types of technology: audio and video; still image capture; and store and forward.
UT	"Practice of telepharmacy" means the practice of pharmacy through the use of telecommunications and information technologies.
VT	"Practice of Telepharmacy" means the provision of pharmaceutical care through the use of telecommunications and information technologies to patients at a distance.
WA	not defined, referred to as pharmacies storing, dispensing and delivering drugs to patients without a pharmacist on-site
WI	not defined in rule or law; discusses remote dispensing site
WY	"Telepharmacy" means a site where prescription drugs are stored and dispensed that is remote from but under the active control and supervision of a parent pharmacy and a licensed pharmacist, and that is subject to the requirements of W.S. §33-24-156.

## By Organization:

Org	Definition/statement/guidance	Miscellaneous
<a href="#">NABP</a>	<p>"Practice of Telepharmacy" means the Practice of Pharmacy by registered Pharmacies and Pharmacists located within US jurisdictions through the use of Telepharmacy Technologies between a licensee and patients or their agents at distances that are located within US jurisdictions. The Practice of Telepharmacy is deemed to occur within the jurisdiction in which the patient is located and the jurisdiction(s) in which the pharmacist and, if applicable, pharmacy are located; therefore, such practice will be subject to the Pharmacy practice regulations of all jurisdictions' Boards of Pharmacy</p>	<p>"Telepharmacy Technologies" means secure electronic communications, information exchange, or other methods that meet applicable state and federal requirements.</p>

**APHA**

discusses NABPs definition:  
“the provision of pharmacist care by registered pharmacies and pharmacists located within U.S. jurisdictions through the use of telecommunications or other technologies to patients or their agents at distances that are located within U.S. jurisdictions.”

“Pharmacist care” is “the provision by a pharmacist of patient care activities with or without the dispensing of drugs or devices, intended to achieve outcomes related to the cure or prevention of a disease, elimination or reduction of a patient’s symptoms, or arresting or slowing of a disease process.  
Types of telepharmacy services: MTM  
Chronic disease management (CCM),  
Transitions of care, Pharmacogenomics,  
Remote dispensing, Ambulatory care

**ASHP**

telepharmacy is defined as a method used in pharmacy practice in which a pharmacist utilizes telecommunications technology to oversee aspects of pharmacy operations or provide patient-care services.

Telepharmacy operations and services may include, but are not limited to, drug review and monitoring, dispensing, sterile and nonsterile compounding verification, MTM, patient assessment, patient counseling, clinical consultation, outcomes assessment, decision support, and drug information.

**NCPA**

NCPA only supports the use of technology, such as telepharmacy, to provide patients with access to the services and products of community pharmacy when the technology benefits the patient, the pharmacist AND the local community.  
Telepharmacy should only serve as an adjunct to the traditional brick-and-mortar community pharmacy, which serves as the frontline of health care access in America and the backbone of Main Street commerce.



## PIC Responsibilities

State	PIC responsible of telepharmacy	Language
AK	--	PIC of a remote pharmacy may supervise 1 or more remote pharmacies; a pharmacist must conduct a physical inventory at least annually
AZ	--	a pharmacist licensed and located in this state who is designated as the pharmacist responsible for the oversight of the remote dispensing; elements of a monthly inspection by the pharmacist who is designated as the pharmacist responsible for the remote site including documentation and retention of results of inspection
CA	yes	The designated PIC (pharmacist in charge) of the supervising pharmacy shall also serve as the designated PIC at the remote dispensing site pharmacy
CO	--	For the purpose of this section, the consultant pharmacist is the pharmacist responsible for the other outlet registration and the overall operation pertaining to drug receipt and distribution.
IA	--	The PIC of the managing pharmacy shall designate a PIC of the telepharmacy site who will be identified on the license of the telepharmacy. The PIC of the telepharmacy shall be employed by the managing pharmacy. Nothing in this subrule shall prohibit the PIC of the managing pharmacy from simultaneously serving as the PIC of the telepharmacy.
ID	--	general pharmacy law: "Person in charge" or "PIC" means a pharmacist or, in the case of a prescriber drug outlet, a prescriber whose qualifications, responsibilities and reporting requirements are defined in rule.
IL	yes but can delegate tasks (monthly inspections)	A remote site is considered to be under the supervision of the PIC of the home pharmacy. A PIC or his or her designated pharmacist must complete monthly inspections of the remote site.
IN	yes	the qualifying pharmacist (pharmacist who will qualify the pharmacy by being responsible to the board for the legal operations of the pharmacy under the permit) and a pharmacist on duty are responsible for ensuring sufficient staffing of both sites, may have this designation for 1 supervising pharmacy and 1 remote site; responsible for inspection, maintenance of

		records, control substance inventory and CQI program
LA	yes	The PIC of the supervising central pharmacy shall be the PIC of the telepharmacy dispensing site
MI	yes	PIC of the parent pharmacy shall also serve as PIC of the remote pharmacy, but may not serve as PIC for more than 3 pharmacies; shall work an average of at least 8 hrs/week at each pharmacy which can be satisfied through the use of a telepharmacy system; PIC shall ensure that the remote pharmacy is staffed by a qualified pharmacy technician, establish and maintain a policy & procedure manual
MN	yes	both sites need to apply for a variance request from rule 6800.2400 in order to be PIC at 2 places (supervising pharmacy and remote site)
MT	no	The license holder, agent of the parent pharmacy, or the PIC of the parent pharmacy, or the PIC of the remote site, if different from the parent PIC, shall apply for a license for the remote telepharmacy site. The pharmacist at the parent pharmacy shall perform an ongoing analysis of incident reports and outcomes; the pharmacist at the parent pharmacy or that person's designee shall conduct and complete monthly inspections of the remote site
ND	--	A pharmacist must complete monthly inspections of the remote site; every pharmacy must have a pharmacist designated as the PIC who shall be responsible to the board for a pharmacy's compliance with the laws and regulations, both state and federal, pertaining to the practice of pharmacy
NE	yes but can delegate tasks	The remote dispensing pharmacy must have the same PIC as the supervising pharmacy who must ensure that a rph is onsite at the remote dispensing pharmacy at a minimum of once each calendar month. The PIC in the supervising pharmacy may delegate tasks to another pharmacist who is employed by the supervising pharmacy
NM	yes	The PIC is responsible for the development, implementation, maintenance, and review of written policies and procedures for the safe and effective operation of the remote tele-pharmacy and the oversight by the hub pharmacy. The hub pharmacist must conduct pharmacist site visits and complete inspections of the remote tele-pharmacy
NV	--	A pharmacist who is responsible for the operation of a remote site shall maintain record of drugs, system is able to generate

		labels, establish policy and procedures, ensure pharmacy technician is competent to work at site (fill controls) etc
SD	--	remote pharmacy considered extension of host but must have its own license, An inspection of the remote pharmacy shall be conducted by a licensed pharmacist at weekly intervals or more if deemed necessary. PIC must adhere to implementation of a CQI plan, verify legitimacy of control rx's (or a designate pharmacist may do so), maintain records of control substance, review log of security system
TN	--	PIC is an employee of a FQHC participating in the program; supervisory pharmacist who has the authority and responsibility for compliance with laws and rules pertaining to the practice of pharmacy at the practice site of the PIC
TX	yes	The PIC of the provider pharmacy is responsible for all operations at the remote site including supervision of the telepharmacy system and compliance with this section; a pharmacist employed by provider pharmacy shall make at least monthly on-site visits
UT	yes	the supervising pharmacy's PIC shall serve as RDPIC (remote dispensing PIC), responsible for all remote dispensing pharmacy operations
VT	--	Coordinating pharmacist manager means a VT licensed rph with no less than 3 years of licensed practice experience who has full responsibility for all aspects of one or more remote pharmacies; there is a separate definition for PIC (pharmacist manager) but when the remote pharmacy is associated with a retail pharmacy, the retail pharmacy's pharmacist manager shall be the coordinating pharmacist manager
WA	--	The facility shall designate a responsible pharmacy manager who conducts a complete controlled substance inventory within 30 days of designation; determines the number of techs on duty who can be satisfactorily supervised by the rph(s) on duty; responsibility to assure that the pharmacy is operated in compliance with all applicable state and federal statutes and regulations.
WI	yes	Managing pharmacist is a pharmacist designated by the pharmacy owner to have responsibility for and direct control of pharmaceutical operations in a pharmacy; managing pharmacist at the supervising pharmacy is responsible for all remote dispensing sites connected to the supervising

---

pharmacy.

WY

no, depends see  
language

unless an alternative PIC from the parent pharmacy is specifically designated in writing, the PIC of the parent pharmacy is the PIC for the telepharmacy. The PIC and pharmacist-on-duty are responsible for ensuring that the parent pharmacy and telepharmacy are staffed in accordance with Board rules.

## Controlled Substances

State	Are Controls Permitted	Permit CIII-V	Permit CII	Required Licenses	Notes
AK	no mention	--	--	DEA	
AZ	yes	yes	yes	DEA	
CA	yes	yes	yes	DEA	
CO	no mention	no mention	no mention	DEA	
IA	yes	yes	yes	<a href="#">DEA + CSA registration 657-13.16(2)</a>	
ID	yes	yes	yes	DEA only (exemption from obtaining separate control substance registration under 230.07) but still comply with ID Uniform Control Substance Act	remote dispensing pharmacies are classified as a limited service outlet and listed as such on DEA registration
IL	yes	yes	yes	<a href="#">DEA + IDFPR CSR (720 ILCS 570/302)</a>	language doesn't specify which classes
IN	yes	yes	yes	<a href="#">DEA +CSR for non-practitioners</a>	language doesn't specify which classes
LA	yes	yes	yes	<a href="#">DEA + LA Controlled Dangerous Substance license §2425.A.3</a>	language doesn't specify which classes
MI	yes	yes	yes	DEA	
MN	yes	yes	yes	DEA	
MT	yes	yes	yes	DEA	language doesn't specify which classes
ND	yes	yes	yes	DEA	
NE	no mention	no mention	no mention	DEA	
NM	yes	yes	yes	<a href="#">DEA + NM CSR (16.19.33.9.A.13.b)</a>	

NV	yes	yes	yes	<a href="#">DEA + CSR</a>	language doesn't specify which classes
SD	yes	yes	yes	<a href="#">DEA + SD CSR- maintained by SD DOH (Ch 44:58:02)</a>	language doesn't specify which classes
TN	yes*	CV only	NO	<a href="#">DEA + TN CSR (1140-01-.11)</a>	<a href="#">Ch 1140-13 (pg 2 &amp; 4)</a>
TX	yes	yes	NO	DEA	<a href="#">562.110</a>
UT	yes	yes	yes	<a href="#">DEA + CSR (58-37-6)</a>	
VT	yes	yes	yes	DEA	
WA	yes	yes	yes	a controlled substances registration from the commission and DEA	language doesn't specify which classes
WI	yes	yes	yes	DEA	language doesn't specify which classes
WY	yes	yes	yes	<a href="#">DEA + CSR (Ch3. section 4)</a>	language doesn't specify which classes

## Surveillance

State	Continuous Surveillance	Language
AK	--	no mention
AZ	yes	maintain a continuous system of video surveillance and recording of the pharmacy department for at least 60 days after date of recording; counseling uses audio/video technology that is HIPAA compliant
CA	--	retain a recording of facility surveillance, excluding patient communications, for a minimum of 120 days. audio/video communication system for counseling patients shall be secure/HIPAA compliant (records of action performed maintained at remote site for 3 years)
CO	--	no mention
IA	yes	continuous system of video surveillance and recording of the pharmacy maintenance of recordings for a minimum of 60 days following the date of the recording
ID		outlet must maintain video surveillance with adequate number of views of the full facility, retain a high quality recording for a minimum of 90 days; audio/video communication system used to counsel must be clear, secure, and HIPAA-compliant
IL	--	there shall be a working computer/video/audio link to a pharmacist at a home pharmacy whenever the prescription area is open to the public
IN	yes	continuous video surveillance (constant visual supervision and auditory communication); provides an adequate number of views of the entire remote dispensing facility; must retain recording of surveillance (excluding customer communication) for at least 45 days; HIPAA compliant
LA	--	no mention
MI	yes	Surveillance system means a real-time, continuous audio and visual camera system that connects a pharmacist at a parent pharmacy with a remote pharmacy to provide oversight and security surveillance; audio and video recordings from the surveillance system must be retained for at least 45 calendar days
MN	yes	continual, two-way audio visual link between the central pharmacy and each remote site; camera for verification is of sufficient quality and resolution so that the certifying pharmacist can visually identify the markings on tablets and capsules; second camera to be used that is trained on the entire dispensing area (unless certifying camera can be used to monitor activities in other parts of the remote site)

MT	--	the computer, video, and audio link must be operational at all times.
ND	--	remote pharmacy shall have access to its main pharmacy and registered pharmacists by computer/video/audio link while open
NE	--	no mention
NM	yes	video equipment must be capable of resolution sufficient to allow for pharmacist identification of medication dosage forms and the reading of bottle labels via video camera; continuous supervision through a constant live video link with not less than four camera views; real time live monitoring and recorded for a minimum of 90 days; HIPAA compliant link
NV	--	no mention
SD	not clear (see requirements)	continuously accessible, 2-way audiovisual link camera for verification is of sufficient quality and resolution so that the certifying pharmacist can visually identify the markings on tablets and capsules, a second camera is required for security needs (if certifying camera is not able to monitor other parts of the remote site)
TN	--	no mention
TX	--	under continuous supervision supervise electronically through the use of the technology (audio and video, still image capture & store and forward)
UT	not clear (see requirements)	<i>adequate supervision includes maintaining uninterrupted visual supervision and auditory communication; telepharmacy system provides effective video/audio communication with adequate number of views of entire site, retain a recording of surveillance (excluding patient communication) for at least 45 days</i>
VT	not clear (see requirements)	continuously accessible, 2-way audiovisual link verification camera is of sufficient quality/resolution so pharmacist can visually identify markings on tablets & capsules; link shall be recorded while remote pharmacy is in operation and retained for 30 days, pharmacist shall be able to monitor security cameras which shall capture movement within the remote pharmacy at all times
WA	--	The pharmacy is required to have adequate visual surveillance of the full pharmacy and retain a high quality recording for a minimum of 30 calendar days.
WI	--	no mention
WY	--	a real time data/video/audio link w/the parent pharmacy at all times the telepharmacy is open for business; audio/video communication system used to counsel and interact with patients shall be secure & HIPAA compliant



# Compounding

State	Telepharmacy Language	Notes
AK	--	in other rules: compounding means the preparation, mixing, assembling, packaging, or labeling of a drug or device
AZ	pharmacy technicians may not perform extemporaneous sterile or nonsterile compounding but may prepare commercially available medications for dispensing, including the reconstitution of oral powder antibiotics	in other language: compounding means the preparation, mixing, assembling, packaging or labeling of a drug by a pharmacist or an intern or pharmacy technician under the pharmacist's supervision, for the purpose of dispensing to a patient based on a valid prescription
CA	a pharmacy technician shall not compound drug preparations.	in other rules: compounding means altering dosage, delivery system or strength of a drug; combining active ingredients; preparing a drug preparation from chemicals or bulk drug substances; does not include reconstitution of a drug per manufacturer label nor the act of tablet splitting, crushing, capsule opening or addition of flavor to enhance taste
CO	--	in other rules: preparation, mixing, or assembling, of one more active ingredients with one or more other substances; does not include the preparation of copies of commercially available drug products, or repackaging (transfer of a product from one container/device to another)
IA	compounding is prohibited unless an on-site pharmacist has verified the accuracy and completeness of the product	in other rules: compounding means combining, mixing, diluting, pooling, flavoring, or otherwise altering of a drug or bulk drug substance to create a drug; does not include the use of a flavoring agent to flavor a drug or mixing or reconstituting a drug according to the product's manufacturer label
ID	--	in other rules: compounding means a person combines, mixes or alters ingredients of a drug to create a medication tailored to the needs of an individual patient under the supervision of a pharmacist
IL	--	no actual definition in rules or law

IN	--	no actual definition in rules or law
LA	--	in other rules: compounding means the preparation, mixing, assembling, packaging, or labeling of a drug or device; does not include essentially copies of a commercially available product, performance of these activities shall be limited to pharmacists, interns, pharmacy technicians, and pharmacy technician candidates acting under the supervision of a pharmacist
MI		pharmacy tech shall not perform compounding of sterile or nonsterile drugs, except for the reconstitution of prepackaged prescription drugs.
MN	--	in other rules: nonsterile preparation compounding means the preparation, mixing, assembling, altering, packaging, and labeling of a nonsterile drug preparation, according to USP 795
MT	--	in other rules: a pharmacy technician may perform compounding if a mechanism for verification by the supervising pharmacist exists that includes checking of: the original order; additives; dosages; and clarity of IV solution, where appropriate.
ND	--	in other rules: compounding doesn't include tablet splitting, reconstitution of oral/topical products as intended by the manufacturer or repackaging of nonsterile dosage forms for redistribution, dispensing, or administration; compounder or compounding personnel is a pharmacist or other licensed or registered healthcare professional responsible for preparing the compounded preparations
NE	--	in other rules: compounding means the preparation of components into a drug product
NM	No drug compounding shall occur at any remote tele-pharmacy.	compounding is the preparation, mixing assembling, packaging, or labeling of a drug or device reconstitution of commercial products is not considered compounding for purposes of this article
NV	--	in other rules: compounding is the preparation, mixing or assembling of a drug product of which at least one component is a prescription drug; does not include the mixing or

		reconstituting of a nonsterile drug product that is performed in accordance with directions and labeling by manufacturer and approved by FDA
SD	--	in other rules: compounding the taking of two or more measured ingredients, and by simple or complicated means, depending on the nature of the ingredients, fabricating them into a single preparation, usually referred to as a dosage form
TN	--	in other language: Compounding means the preparation, mixing, assembling, packaging or labeling of a drug or device
TX	pharmacy technician may not perform sterile or nonsterile compounding	pharmacy technician may prepare commercially available medications for dispensing, including reconstitution of oral powder antibiotics; drugs which require reconstitution through the addition of a specified amount of water may be dispensed only if a pharmacy technician, pharmacy technician trainee, or licensed healthcare professional reconstitutes the product
UT	a remote dispensing pharmacy may not perform compounding	in other rules: compounding is the preparation, mixing assembling, packaging, or labeling of a limited quantity drug, sterile product or device
VT	no compounding may occur at a remote pharmacy unless a pharmacist is physically present	in other rules: compounding means the preparation of any active ingredients or added substances into a drug product; does not include mixing, reconstituting, or other such acts that are performed according to approved labeling provided by the product's manufacturer
WA	--	in other rules: All licensees must comply, at a minimum, with the chapters 795, 797, 800, 825 of the United States Pharmacopeia (USP) when engaging in compounding of sterile and non-sterile products for patient use or administration
WI	--	in other language (remote site shall comply with all of Phar 7.01): an agent of the pharmacist may procure, measure or count prefabricated dosage forms if a pharmacist verifies accuracy of the agent's action
WY	--	pharmacy technicians may perform only those functions as allowed in Ch 10 of the boards rules including: compounding; compounding is the preparation, mixing, or assembling of a drug or device and packaging & labeling; does not include mixing or reconstituting of non-sterile products when following labeling provided by manufacturer

## Mandatory Counseling

State	Counseling Required	For new prescriptions	Additional information and Notes
AK	no mention	--	--
AZ	no mention	--	--
CA	yes	yes	Patient counseling shall be provided using audio-visual communication prior to all prescriptions being dispensed from a RDS pharmacy
CO	no mention	no mention	
IA	yes	yes	The pharmacist is to counsel on any prescriptions dispensed to the patient that are new or a change in drug therapy
ID	yes	yes	A pharmacist shall counsel the patient or caregiver before dispensing a new medication, or when otherwise deemed necessary, a technician may extend an offer for refills or renewed prescriptions
IL	yes	no mention	Counseling must be done by a pharmacist via video and audio link before the drug or medical device is released
IN	yes	no mention	Locations must maintain a separate counseling area and must mention in application if counseling will be provided on refills
LA	yes	yes	A pharmacist shall counsel for all new prescriptions and refills using the technology in the telepharmacy system
MI	yes	no mention	any patient counseling that is required by rule must be provided before the drug or device is dispensed and is HIPAA compliant
MN	yes	no mention	The pharmacist is required to speak to a patient, over an audiovisual link, each time a prescription is picked up
MT	yes	yes	The pharmacist shall offer to counsel via video and/or audio link on all new prescriptions
ND	yes	yes	The pharmacist must counsel on all new prescriptions and refills
NE	yes	yes	The supervising pharmacist must attempt to counsel on all new prescriptions
NM	yes	yes	A pharmacist shall offer to counsel on new prescriptions; a pharmacy technician may query the patient or their agent regarding consultation by a pharmacist for refills

NV	no mention	no mention	--
SD	yes	yes	Counseling is required only for new prescriptions; the remote pharmacy must maintain a log, signed by the patient, that documents a refusal for counseling
TN	yes	yes	The pharmacist shall counsel by means of telepharmacy before a new prescription is issued; for refills a pharmacy tech shall offer counseling before the prescription is issued
TX	yes	yes	Counseling shall be provided with new prescriptions and any prescription with a change in the last year
UT	no mention	no mention	--
VT	yes	yes	Counseling is required for all new prescriptions, patient refusal shall be documented
WA	yes	yes	The pharmacist shall offer to counsel upon the initial fill of a prescription for a new or change of therapy and when determined necessary by the pharmacist. Visual and audio communication system used to counsel must be clear, secure, and HIPAA compliant.
WI	--	--	Required signage must state that a pharmacist is required to speak with you each time you pick up a prescription
WY	yes	yes	All new prescriptions shall be counseled by a pharmacist in the consultation room or by audio/video link with the parent pharmacy or in person if the pharmacist is on duty at the telepharmacy (an intern may provide counseling provided it is performed under the supervision of a pharmacist)

## Maximum Script Counts

State	Max Script Count	Notes on Max Count
AK	--	
AZ	--	
CA	225 prescriptions per day per calendar year	if >225, site may become a full-service pharmacy with a pharmacist onsite if it meets all the requirements for licensure
CO	50,000 units per calendar year	if > 50,000 units in a calendar year telepharmacy shall register with the board as a prescription drug outlet
IA	average 150 prescriptions per day over the previous 90 days	if the average number exceeds 150 the site shall provide on-site pharmacist staffing 100 % of the time & within 10 business days, apply for licensure as a general pharmacy.
ID	--	
IL	--	
IN	--	
LA	100 prescriptions per day based on a six-month average	convert its permit to a community pharmacy permit prior to the expiration date of the telepharmacy dispensing site permit
MN	average of 8 prescriptions per hour	board recommended (not required)
MI	average of 150 prescriptions/day during a 90-day period	--
MT	--	
ND	--	
NE	--	
NM	200 prescriptions per day	convert to a retail pharmacy once filling >200 prescriptions per day
NV	--	
SD	--	a central pharmacy shall provide pharmacist staffing to meet the workload of both the central and remote pharmacies

TN	--	
TX	max average of 125 prescriptions per day per calendar year	If the average number exceeds 125 prescriptions (as calculated per calendar year), site shall apply for a Class A pharmacy license
UT	--	
VT	a pharmacist who is also supervising a supervising pharmacy may average 125 prescriptions at remote site per work day in any 1 week or max 150 per day	a pharmacist who only provides remote services may average 250 prescriptions per work day in any 1 week or a peak of 300 prescriptions per day
WA	--	
WI	--	
WY	--	

## Pharmacist On-Site Visits

State	Frequency	Notes
AK	annually	a pharmacist must conduct a physical inventory at each remote pharmacy location at least annually
AZ	monthly	monthly inspection of the remote site, perpetual inventory and reconciliation of controls by the pharmacist responsible for the site
CA	monthly	A pharmacist from the supervising pharmacy shall complete a self-inspection in-person monthly, and an perpetual inventory reconciliation report of all CIIIs at least once every three months
CO	once per month	inspected and visited at least once per month by a consultant pharmacist
IA	16hrs per month and monthly audit	a monthly inspection of the telepharmacy site by the PIC or designated pharmacist, staffed by a pharmacist for at least 16 hours per month in an effort to promote public health
ID	monthly	A pharmacist must complete and retain a monthly in-person self inspection of the drug outlet; if a perpetual inventory is not kept for all CIII-Vs, the pharmacist must inventory and audit at least 3 random controls quarterly
IL	monthly	A PIC or their designated pharmacist must complete monthly inspections of the remote site
IN	twice monthly	a pharmacist must perform an inspection of the remote dispensing facility no less than twice per month (at least 1 must be performed by the qualifying pharmacist); review control inventory during this inspection
LA	monthly (every 30 days)	PIC responsible for routine inspections, each inspection shall be conducted no later than 30 days after the previous inspection
MI	monthly	a pharmacist completes a monthly, in-person inspection of the remote pharmacy that includes: conducting inventory reconciliation for controls and reviewing surveillance system video that the pharmacist considers necessary.
MN	weekly	during the weekly inspection visits the PIC completes a quality assurance check of all control prescriptions and reviews log entries of people in the pharmacy
MT	monthly	pharmacist at the parent pharmacy or that person's designee shall conduct and complete monthly inspections of the remote telepharmacy site



ND	monthly	A pharmacist must complete monthly inspections of the remote site
NE	monthly	PIC must ensure that a pharmacist is onsite at a minimum of once each calendar month, PIC may delegate to any pharmacist
NM	monthly	hub pharmacist (not necessarily PIC) must conduct site visits and complete inspections at least once monthly; visits include calculation of average daily script count, inventory & reconciliation of all controls
NV	monthly	the pharmacist responsible for operation of remote site shall personally inspect the remote site at least monthly
SD	weekly	inspection conducted by a licensed pharmacist at weekly intervals (or more if necessary) which includes verification of control prescriptions; monthly inventory of all controlled substances
TN	twice monthly	PIC or a designee shall complete an in-person inspection twice a month
TX	monthly	A pharmacist employed by a provider pharmacy shall make at least monthly on-site visits to a remote site to reconcile perpetual inventory of all controls and provide clinical services
UT	monthly	monthly in-person inspection and documentation (perpetual inventory of CII, reconciliation of all controls, refrigerator/freezer temperature logs and records of entry into remote pharmacy) kept by RDPIIC
VT	weekly	coordinating pharmacist manager must conduct an inspection at weekly intervals or more frequently if necessary, and conduct an inventory of all controlled substances at least monthly to verify accuracy
WA	monthly	responsible pharmacy manager, or designee, shall complete and retain, in accordance with WAC 246-945-005 a monthly in-person inspection of the pharmacy.
WI	monthly	managing pharmacist shall visit at least monthly to conduct controlled substance inventory and ensure compliance with laws
WY	monthly	monthly in-person pharmacist inspection

## Technician Training

State	Technician Rules
AK	none specified
AZ	2hr CE + certified + 1000 hours experience as a technician in outpatient setting
CA	registered + certified + one of the following (associate degree in pharmacy technology or bachelors degree or board certified training) + 2000hrs in last 2 years
CO	certified
IA	certified + registered + 2000hrs (1000hrs in IA licensed pharmacy, 160hrs in managing pharmacy), 4hrs CE (2 med errors/patient safety, 2 law)
ID	certified
IL	registered + certified +1 year experience or be a student pharmacist
IN	licensed under IC 25-26-19 + certified + 2000hrs experience under direct supervision of rph, if in a hospital/clinic must have graduated from ACPE or ASHP accredited tech training program or completed the 2000hrs prior to 7/1/17
LA	licensed + certified + 2 years experience as a Louisiana certified tech
MI	licensed + 1,000 hours of experience working in a pharmacy + certified
MN	registered + certified + 1 year of experience (2080hrs)
MT	registered + certified + 500hrs
ND	registered + certified + 1 year
NE	certified
NM	certified + registered + 2000hrs
NV	registered + 1 year
SD	certified + registered + 2000hrs; intern only requires 500hrs
TN	registered
TX	certified + registered + 1 year in a retail pharmacy (in last 3 years) + training
UT	licensed + 500 hrs
VT	registered + certified + 2000hrs
WA	certified
WI	1500hrs in the last 3 yrs or completion of board approved training program
WY	none specified

## Telepharmacy Oversight & Staff Ratio

State	Telepharmacy Number Oversight	Pharmacist to Technician Ratio
AK	PIC may supervise 1 or more remote pharmacies	--
AZ	a pharmacist can supervise 1 site, but if not simultaneously supervising & dispensing can supervise 2 sites (can request a waiver for more)	--
CA	Supervising pharmacy shall provide services for only 1 remote dispensing pharmacy (RDS)	1:2 (total for both sites)
CO	Other outlet (telepharmacy) may employ or contract with 1 more rphs	1:6 (if 3 or more are on duty the majority must be certified)
IA	--	none
ID	--	--
IL	each pharmacist may supervise no more than 3 remote sites that are simultaneously open	--
IN	qualifying pharmacist may have 1 supervising pharmacy and 1 remote dispensing facility at a time	1:6 (does not include 1 cashier who may be on duty)
LA	central pharmacy may supervise no more than 2 telepharmacy sites, all sites must be located in LA	1:1 (tech included in total ratio of personnel at supervising pharmacy)
MI	a pharmacist may not be PIC for more than 3 pharmacies; a pharmacist shall not simultaneously oversee 3 or more remote pharmacies	--
MN	--	1:3 or 4 (may add one additional technician if all are certified, techs included in central site ratio)
MT	--	1:4 (per general pharmacy law)

ND	a pharmacist may oversee no more 4 four remote sites (this was removed from 1 section of the rules but not all)	telepharmacy is excluded from the ratio requirement of pharmacists to techs
NE	--	1:3 (per general pharmacy law)
NM	A hub pharmacist shall not provide direct or indirect supervision for more than 4 pharmacies	Determined by PIC (included in total ratio with hub techs)
NV	--	1:3
SD	--	1:3 (interns not included, reflects total for both pharmacies)
TN	--	--
TX	each pharmacist may supervise no more than 2 remote sites that are simultaneously open	1:3 (tech included in central pharmacy ratio)
UT	A supervising pharmacist may not supervise more than 2 pharmacies simultaneously, RDPIC may not have more than 1 remote pharmacy unless approved by the board	1:2
VT	If engaged in the operation of a retail, institutional or mail order pharmacy a pharmacist shall not operate more than 1 remote  if not engaged in the operation of those pharmacies an rph may operate no more than 3 remotes	sufficient staff for workload
WA	--	determined by responsible pharmacy manager, who can ensure the number of techs on duty can be satisfactorily supervised by the rph(s) on duty
WI	--	--
WY	--	--

## Mileage Restrictions

State	Central Pharmacy Distance to Telepharmacy	Distance to another Pharmacy	Telepharmacy Status if another Pharmacy Opens
AK	--	10 miles	--
AZ	--	0	--
CA	max 150 miles (or board approved)	10 miles unless otherwise approved by board	continue operation
CO	--	20 miles	
IA	200 mile radius	10 miles, submit waiver at <10miles, 0 if in hospital for inpatient meds or on state land	continue operation
ID	on-site w/in 12hrs of emergency	0	--
IL	--	0	--
IN	located within 45 miles supervising pharmacy	10 miles, 0 miles if in clinic or hospital, or demonstrate need to board	--
LA	--	15 miles or demonstration of need to board for determination waiver is appropriate	--
MI	--	10 miles, 0 if in a hospital or mental health facility, or apply to board for waiver	may continue to operate
MN	--	20 miles	--
MT	--	20 miles	--
ND	--	0 (apply to board for Class K permit)	--
NE	--	10 miles	--
NM	--	20 miles	--
NV	--	50 miles and an area with a population < 2000	--

SD	--	-- (applicant shall apply to board and demo that there is limited or no access to pharmacy services in the community)	--
TN	--	0 miles (only in FQHC pilot program)	--
TX	--	22 miles (10 for clinics, 0 miles for FQHCs)	continue operation
UT	--	area of need (remote rural hospital which is controlled by a board that owns no more than 2 hospitals, or county of 4th-6th class, or applicant successfully demos need), approved by DOPL in collaboration with the board	--
VT	--	10 miles	board will not renew license, apply to become a retail pharmacy
WA	on-site w/in 3 hrs of emergency	0	--
WI	--	0 miles but only located in healthcare facilities and clinics	--
WY	--	10 miles (0 in counties with cities with population >50k, any facility owned/leased by the state, or in hospital/clinic)	board will not renew license (but the telepharmacy may continue to operate until the end of the current license year) or telepharmacy may apply to become a pharmacy