Dispensing Practitioner
Drug Outlet (DPDO) Overview
Presentation Overview

- Oregon Board of Pharmacy (OBOP) Mission statement
- DPDO Registration Requirements
- Outlet Expectations
- Dispensing Practitioner Expectations
- OBOP Inspection
To promote, preserve and protect the public health, safety and welfare, by establishing high standards in the practice of pharmacy and in the distribution of drugs in Oregon.

- Education
- Communication
- Licensure & Compliance
Dispensing Practitioner Drug Outlet (DPDO)

- Department of Justice Final Opinion (2013)
  - Practice sites with dispensing practitioners are subject to OBOP drug outlet registration

- DPDO rules are intended to describe OBOP’s outlet registration and compliance expectations
Registration

- Who must register?
  - Facilities that dispense prescription drug therapies greater than 72 hours supply or any medication refill

- Fees: $100

- Registration expires March 31st annually, fees must be paid by February 28th
Who is Exempt from DPDO Registration?

Practitioners and facilities only dispensing:
- drug samples
- Medication Assistance Program drugs
- homeopathic products
- natural thyroid supplemental products
- up to 72 hours supply

Greater than 72 hours supply if the drug is:
- the manufacturer’s original unit-of-use packaging
- a full course of therapy, if in the professional judgement of the practitioner would be in the patient’s best interest
Outlet Expectations Overview

- Polices and Procedures
- Security
- Drug Acquisition and Storage
- Drug Disposal
- Drug Dispensing
Policies and Procedures

Must maintain written policies and procedures for the management of drugs intended for dispensing, to include:

- Security
- Acquisition
- Storage
- Dispensing and drug delivery
- Disposal
- Record keeping
Security

- All drugs must be kept in a locked drug cabinet or drug storage area that must be locked and secure when not in use.

- Security must prevent unauthorized persons from having access to the drug cabinet/storage area.

- The drug cabinet/storage area cannot be placed in a waiting room or an area that is accessible to the public.
Drug Acquisition and Storage

- DPDOs must verify that all drugs are acquired from a registrant of OBOP.

- ALL drugs must be stored according to manufacturer’s published guidelines:
  - Temperature
  - Light
  - Humidity
  - Sanitation
  - Ventilation
  - Space
Drug Disposal

Reasons for drug disposal:
- Recalled
- Outdated
- Damaged
- Deteriorated
- Misbranded
- Adulterated
- Identified as suspect or illegitimate

Drugs for disposal must be documented, quarantined and physically separated from other drugs.
Drug Dispensing

A practitioner must dispense in compliance with State/Federal laws and the requirements of the practitioner’s licensing Board.

Drugs must be dispensed in a new container.

Drugs must be packaged by the practitioner, a pharmacy, or a manufacturer registered with OBOP.

A DPDO may not accept the return of drugs but must maintain a list of sites in Oregon where drugs may be disposed.
Best Practices for Dispensing

Valid Prescription Order
- Prescribing practitioner is authorized to prescribe according to licensure and/or training

Drug Utilization Review
- Assessment of allergies, contraindications, therapy duplication, medication adherence, and drug-drug, drug-food, or drug-disease interactions

Final Verification
- Ensuring the drug and label matches the prescription before dispensing to the patient

Counseling
- Teaching the patient the purpose of the medication, how to properly take the medication and what to expect when taking the medication
Labeling

A prescription must be labeled with the following:

- Name of patient
- Name of prescriber
- Name, address and phone number of the clinic
- Date of dispensing
- Name and strength of drug (include manufacturer’s name if generic drug)
- Quantity dispensed
- Directions for use
- Cautionary statements, if any, as required by law
- Expiration date after which the patient should not use the drug
- Physical description of drug if not unit dose or unit of use packaging

Doctor’s Office
1234 SE Fall Ave, Portland, OR 97214
503-555-5555
Prescriber: Dr. John Smith

Patient: Jane Doe
Date filled: 11/20/2017

Atorvastatin calcium 20mg
Manufacturer: Watson

Take one tablet by mouth every day
QTY: 30  EXP: 11/20/2018
Oval. white, PD 156 20

-Avoid consuming grapefruit or grapefruit juice while on this medication
-Consult your pharmacist or doctor about using this medication if you are pregnant, plan to become pregnant, or if you are breast feeding
Record Keeping

- A unique dispensing record must be maintained and kept for a **minimum of three years**
  - Name of patient
  - Dose, dosage form, quantity dispensed and drug name (if generic include manufacturer’s name)
  - Directions for use
  - Date of dispensing
  - Initials of person dispensing the prescription

- Records should be readily retrievable and available for inspection by OBOP

<table>
<thead>
<tr>
<th>Patient Name</th>
<th>Drug Name Manufacturer</th>
<th>Dose</th>
<th>Dosage Form</th>
<th>Qty Dispensed</th>
<th>Date of Dispensing</th>
<th>Directions for Use</th>
<th>Initials of Dispenser</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jane Doe</td>
<td>Atorvastatin Watson</td>
<td>20mg</td>
<td>Tablet</td>
<td>30</td>
<td>11/20/2017</td>
<td>Take one tablet by mouth daily</td>
<td>JS</td>
</tr>
</tbody>
</table>
OBOP Inspection

Each DPDO must complete a self-inspection form by February 1st, annually.

This form must be made available during OBOP inspection.

Inspections will be scheduled in advance with the practitioner and will focus on:

- Acquisition
- Storage
- Labeling and recordkeeping of drugs intended for dispensing.

Any violation will apply to the DPDO registration and not to the practitioner.

OBOP will notify the practitioner’s licensing Board of any disciplinary action taken against a DPDO.