Telepharmacy: How One Wyoming Pharmacy Makes it Work

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Wyoming Telehealth Network
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Telepharmacy: How One Wyoming Pharmacy Makes it Work

Why Telepharmacy?

- Increase access and extend availability. We may have clinics with providers and/or utilize telemedicine – then how do those being treated obtain any prescribed medicines timely and conveniently.
- In this case study, CRMC’s Foundation helped raise funding for building the new clinic, which included carrying forward the telepharmacy available in the original clinic in Pine Bluffs. The facility was built with floor plan to accommodate a dispensing area; adjoined by a private, secure consultation room – both with real-time data, video and audio communications.
- As part of CRMC’s CMS Healthcare Innovation Award, through its division, The Wyoming Institute of Population Health, the parent pharmacies, currently NorthStar Pharmacy & Infusion have been assisted with Polycom desktop software, webcams and networking via an encrypted videoconferencing bridge.
Telepharmacy in Pine Bluffs

The current Pine Bluffs Health Clinic providers and management is with Kimball Health Services, Kimball, NE.

Entering the Clinic, the *Telepharmacy* is in the front area, exam rooms and offices in the rear area of the building. To the right of the shelving is the door to the *consultation room* (behind dispensing).

Consultation room, equipped with real-time encrypted (military grade) videoconferencing to the pharmacist in the parent pharmacy.

This view is from the consultation room door out to the back counter of the dispensing area.

(*Interior photos taken during ribbon cutting, used so as not display actual inventory.*)
Wyoming Pharmacy Act

Wyo. Stat. § 33-24-101 through 33-24-301

* Wyoming State Statutes referenced in pertinent portions here, are available on-line or as PDF downloads furnished on the WyTN Webinar Web page.

  o (b) As used in this act:

  (i) "Direct supervision" means that a licensed pharmacist shall be physically present and capable of observing the actions of a pharmacy technician except at telepharmacies where video oversight is maintained;

  (ii) "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;

(a) The board pursuant to its rules and regulations may authorize a resident pharmacy licensee to store and dispense prescription drugs as provided in subsection (b) of this section through a telepharmacy located at a site at least ten (10) miles from a licensed pharmacy except this ten (10) mile restriction does not apply:

(i) In counties with a city of fifty thousand (50,000) or more persons as shown in the most recent federal census; or

(ii) To any facility owned or leased by the state or any subdivision of the state; or

(iii) To any facility located in a hospital or clinic setting.

(b) Telepharmacies shall include the following minimum features:

(i) Storage, security and dispensing of prescription drugs only:

(A) In unit of issue packages;

(B) Through a system which dispenses tablets or capsules from an enclosed and lockable cabinet directly into a prescription vial and prints and applies a prescription label to the vial; or
Wyoming Pharmacy Act

Wyo. Stat. § 33-24-101 through 33-24-301

➢ Wyo. Stat. § 33-24-156. Telepharmacy practice authorized. (cont’d)

(C) By manually dispensing tablets, capsules or liquids from a stock bottle into a prescription vial and affixing a prescription label to the vial.

(ii) Connection by a secure communication system to the parent pharmacy, with the capability of live video and audio communication with a licensed pharmacist at the parent pharmacy during hours of operation;

(iii) Adequate provision for security, including verification of customer identity and prescription information;

(iv) Automated inventory control using bar codes, radio frequency tags or a similar identification system;

(v) Prominent display of the name, address and toll free telephone number of the parent pharmacy;

(vi) Telepharmacies shall be supervised by a parent pharmacy and a licensed pharmacist and shall be staffed during hours of operation by a licensed pharmacist, certified pharmacy technician or registered pharmacy intern.
Wyoming Pharmacy Act

Wyo. Stat. § 33-24-101 through 33-24-301

Wyo. Stat. § 33-24-156. Telepharmacy practice authorized. (cont’d)

(c) A telepharmacy system operated as provided in this act and in accord with rules and regulations of the board is deemed to be operated under the charge of a licensed pharmacist for purposes of W.S. 33-24-113(b).

(d) A licensed pharmacist who supervises a telepharmacy shall complete an inspection of the telepharmacy at a frequency specified by the board of pharmacy. Inspection criteria shall be developed by the state board of pharmacy and all inspection criteria shall be included in the policies and procedures applicable to each telepharmacy site. Inspection reports shall be prepared pursuant to standards adopted by the board of pharmacy and shall be maintained by each telepharmacy until the next state board of pharmacy inspection.
Section 4. Definitions.

(a) “Adequate Supervision” means oversight by the parent pharmacy by which they maintain visual supervision and auditory communication with the telepharmacy and full supervisory control of the automated system, if applicable, and shall not be delegated to another person or entity.

(b) “Automated Dispensing Device” means a mechanical system which performs operations relative to distributing individual unit of issue packages, and which collects, controls, and maintains all transaction information.

(c) “Parent Pharmacy” means a pharmacy licensed by the Board which is authorized by the Board to operate a telepharmacy site via real-time data, video, and audio links.

(d) “Real-time” means that the transmission of information through data, video and audio links is so rapid that the information is available to the parent pharmacy and telepharmacy sites simultaneously.
Section 4. Definitions. (Continued)

(e) “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. *(Telepharmacy practice authorized.)*

(f) “Single Unit Dose” means a package that contains one unit of medication.

(g) “Traditional Dispensing” means a drug package system in which individual doses are not packaged in single unit dose packages or unit of use packages.

(h) “Unit of Use package” means a package that provides multiple units of doses separated in a medication card or other similarly designed container.
Section 5. Licensing of Facilities

(a) An application for licensure to establish, operate or maintain a telepharmacy shall be made on an application provided by the Board and submitted to the Board no less than sixty (60) days prior to opening the telepharmacy.

(b) A set of blueprints shall be provided to the Board with the initial application for licensure.

(c) Prior to opening a telepharmacy site, the Board shall inspect the telepharmacy for minimum standards of this Chapter.

(d) The Board shall be notified with every change of pharmacist-in-charge (PIC).

*(e) & (f) speak to Annual licensing; initial and renewal fees $150 to $200. License not renewed if a retail pharmacy opens within 10 miles of telepharmacy – except in counties with a city of 50,00 or more persons, facility owned or lease by the State, facilities within a hospital or clinic setting . . . *summarized
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Section 6. Minimum Structural, Security and Equipment Requirements to Operate a Telepharmacy.

(a) All telepharmacies operating in Wyoming shall meet the following structural requirements:
   (i) Shall consist of an area of no less than 150 square feet exclusive of the patient consulting room;
   (ii) Shall have a means of delivering a private, secure consultation;
   (iii) Shall include a sink with a hot and cold water supply, exclusive of restroom facilities, with approved sewage disposal;
   (iv) Shall be properly lighted and ventilated. The temperature of the telepharmacy shall be maintained within a range compatible with the proper storage of pharmaceuticals; and
   (v) Shall have adequate shelving and counter space on which to work and the working surface shall be kept clear and uncluttered at all times.

(b) All telepharmacies operating in Wyoming shall meet the following security requirements:
   (i) Shall be secured with solid core or metal doors with a deadbolt and a locking doorknob;
   (ii) Shall have in place dedicated intrusion detectors, which provide coverage throughout the telepharmacy;
   (iii) – (v) continues with applicable architecture and secure access; lockable, attached storage...
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➤ Section 6. Minimum Structural, Security and Equipment Requirements to Operate a Telepharmacy. (Continued)

(c) All telepharmacies operating in Wyoming shall meet the following equipment requirements:

(i) A computer, scanner, and printer which meet the following requirements:

(A) All prescription data shall be processed utilizing the aforementioned electronic data processing equipment;

(B) All new prescriptions shall be scanned, sequentially numbered and the prescription labels shall be produced on site;

✓ (C) Scanned prescription shall be displayable on the computer terminal at both the telepharmacy and parent pharmacy. Scanned prescriptions must be available for review for every new and refill prescription processed at the telepharmacy;

✓ (D) All patient demographics, as well as all prescription information, shall be viewable at both the telepharmacy and parent pharmacy in a real time mode;

(E) Prescriptions dispensed at the telepharmacy site shall be distinguishable from those dispensed at the parent pharmacy including a unique label with a unique identifier in the prescription data base. Furthermore, the initials of the pharmacist who releases the prescription from the parent pharmacy shall appear on the prescription label;
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Section 6. Minimum Structural, Security and Equipment Requirements to Operate a Telepharmacy.

(c) All telepharmacies operating in Wyoming shall meet the following equipment requirements: (*Continued)
   (i) A computer, scanner, and printer which meet the following requirements:

   (F) Video monitors used for the proper identification of and communication and consultation with persons receiving prescription drugs shall be a minimum of twelve inches (12”) wide, be of high definition, and provided at both the telepharmacy and the parent pharmacy for direct visual contact between the pharmacist and the patient or the patient’s agent; and

   (G) The video and audio communication system used to counsel and interact with each patient or patient’s caregiver shall be secure and HIPAA compliant.

   (ii) A real time data, video, and audio link with the parent pharmacy at all times the telepharmacy is open for business;
   (iii) Fax capability;
   (iv) Any automated dispensing device shall be approved by the Board prior to installation;
Section 6. Minimum Structural, Security and Equipment Requirements to Operate a Telepharmacy.

(c) All telepharmacies operating in Wyoming shall meet the following equipment requirements: (*Continued)

(v) A separate refrigerator located in the telepharmacy, which is sufficient in capacity to serve the needs of the telepharmacy that is equipped with a thermometer and provides a storage temperature of 36-46 degrees Fahrenheit (2-8 degrees Centigrade). The use of such refrigerator shall be limited to the storage of drugs. If a freezer compartment is utilized, it must maintain a temperature of -13 to +14 degrees Fahrenheit (-20 to -10 degrees Centigrade); and

(vi) Access to a current set of Wyoming pharmacy laws and Wyoming State Board of Pharmacy Newsletter by access to the Board’s website.

(d) Upon written request and for good cause, the Board may waive any of the requirements of this chapter. A waiver that is granted under this section shall only be effective when issued by the Board in writing.
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Section 7. Daily Operations.

(a) A telepharmacy site may not remain open for business if an interruption in data, video or audio link occurs. Whenever an *interruption in data, video, or audio link occurs, no prescription shall be dispensed* and a sign shall be posted noting the closure and an estimated time when resumption of services can be expected.

(b) The *telepharmacy shall be staffed by a pharmacy technician or a pharmacy intern*, licensed by the Board, or by a pharmacist whenever a pharmacy technician or intern is not available. Under no circumstance may the telepharmacy remain open for business unless a pharmacy technician, pharmacy intern or a pharmacist is on duty.

(c) A pharmacy technician may only perform those pharmacy functions as allowed in Chapter 10 of the Board’s rules. Adequate supervision shall be provided by a pharmacist at the parent pharmacy utilizing the data, video and audio link.

(d) A pharmacy intern may only perform those duties as allowed in Chapter 3 of the Board’s rules. Adequate supervision shall be provided by a pharmacist at the parent pharmacy utilizing the data, video and audio link.

(e) Data entry may be performed at the parent pharmacy or at the telepharmacy site. All *entries performed at the telepharmacy site must be verified by a pharmacist at the parent pharmacy prior to dispensing* of the prescription at the telepharmacy.
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➤ Section 7. Daily Operations. (Continued)

(f) Verification of prescriptions entered and dispensed at the telepharmacy site shall include:
   ✓ (i) For a new prescription, the pharmacist at the parent pharmacy, utilizing the data/audio/video link, shall review the patient profile as required by the Board’s rules, the original scanned prescription, the unit of use or stock package selected to be dispensed or the prescription vial that has been filled if traditional dispensing it utilized and the directions as entered by the pharmacy technician or intern. The pharmacist shall view the label affixed to the unit of use package or prescription container to assure accuracy using the image or video link. The offer to counsel shall be made by the pharmacist; or

   ✓ (ii) For a refill prescription, the pharmacist at the parent pharmacy, utilizing the data/audio/video link, shall review the patient profile, the label, the filled prescription container to be dispensed and assure the label is affixed to the correct prescription container.

(g) Verifications of prescriptions entered at the parent pharmacy and dispensed at the telepharmacy shall include:
   (i) The pharmacist shall perform a prospective drug use review of all new and refill prescriptions as outlined in the Board’s rules.

   ✓ (ii) Utilizing the audio/video link, the pharmacist shall review the label, the stock medication container selected for dispensing, and assure the label is affixed to the correct prescription container at the telepharmacy site.
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Section 7. Daily Operations. (Continued)

(h) Counseling.

✓ (i) All patients receiving a new prescription shall be counseled by a pharmacist in the consultation room or at a private, secure computer by audio/video link with the parent pharmacy or in person if the pharmacist is on duty at the telepharmacy;

✓ (ii) All patient questions regarding medication therapy or questions regarding over-the-counter products shall be answered by a pharmacist at the parent pharmacy utilizing an audio/video link in the consultation room, at a private, secure computer, or in person if the pharmacist is on duty at the telepharmacy;

(iii) All counseling performed by the pharmacist shall be in accordance with the Board’s rules; and

(iv) A pharmacy intern may provide counseling at the telepharmacy site provided all counseling is performed under the supervision of a pharmacist at the parent pharmacy and is conducted in the consultation room or at a private, secure computer utilizing an audio/video link to the parent pharmacy.
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❖ Section 7. Daily Operations. (Continued)

(h) Counseling.

✓ (i) Under no circumstance may a prescription be dispensed at the telepharmacy site until all verification required by this section has been fulfilled by a pharmacist at the parent pharmacy and the prescription has been released by the pharmacist. Release of the prescription by the pharmacist at the parent pharmacy shall be documented electronically for each prescription dispensed.

(j) Under no circumstance shall prescription drug samples be stored or dispensed at the telepharmacy site.

❖ Meds at Beds at CRMC — explain this compliance program. While not a true telepharmacy, how is the dispensing of take home medications to the patient’s room practical, through use a travelling tablet with secure audio/video link with the parent pharmacy/pharmacist as needed.
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Section 8. Recordkeeping Requirements.

(a) All written prescriptions presented to the telepharmacy site shall be scanned into the electronic data processing equipment, such that on initial dispensing and each refill, the original prescription may be viewed on the monitor at both the telepharmacy and parent pharmacy site. All scanned prescriptions shall be retained electronically for at least two (2) years from the date scanned. All written prescriptions shall be delivered to the parent pharmacy for filing within 72 hours. Records shall be maintained at the parent pharmacy in files separate from the parent pharmacy files.

(b) Controlled substance records shall be maintained at the telepharmacy unless specific approval is granted for central storage as permitted by state and federal law.

* Describe NorthStar’s current preference on maintaining and dispensing controlled substances by means of currier services in place of on premises storage.

(c) Prescriptions required will be reported to WORx.

(d) The establishment of minimum standards and practices necessary to ensure safety, accuracy, security, sanitation, recordkeeping, and patient confidentiality shall include:
   (i) Identification of personnel authorized to have access to the drug storage and dispensing areas at the telepharmacy and to receive drugs delivered to the telepharmacy;
   (ii) Procedures for the procurement of drugs and devices to the telepharmacy and into any automated dispensing device used, as applicable; and
   (iii) The criteria for monthly in-person pharmacist inspection of the telepharmacy and appropriate documentation on a form designated by the Board.
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   (a) 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.
   
   (b) The PIC and pharmacist-on-duty are responsible for ensuring that the parent pharmacy and telepharmacy are staffed in accordance with Board rules.

➢ Section 10. Delivery and Storage of Drugs.
   (a) Prescription drugs shall be delivered to the telepharmacy when a pharmacy technician or pharmacist is present to accept delivery and verify that the drugs were actually received;
   
   (b) An automated dispensing device shall be stocked with drugs only by a pharmacist licensed by the Board, a registered pharmacy technician or pharmacy intern under the supervision of a pharmacist; and
   
   (c) Prescription drugs shall be stored in accordance with Board rules.
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?? QUESTIONS ??

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