Issued: April 26, 2022. Updated: July 11, 2022; May 8, 2024.

GUIDANCE TO REVISED BOARD RULE GOVERNING INTER-PHARMACY REMOTE MEDICATION ORDER PROCESSING

The Board of Pharmacy has completed a rulemaking to amend Rule .1816, now titled "Centralized Pharmacy Services." The amended rule broadens the availability of remote medication order processing ("RMOP") arrangements among pharmacies to all pharmacy practice types. The full rule is found here: 21 NCAC 46.1816.

The Board began enforcing revised Rule .1816 on July 1, 2022. Previous Board waivers occasioned by the COVID-19 public health emergency and speaking to remote operations were revoked as of that date.

NOTE This guidance document only concerns inter-pharmacy remote operations. services arranged among two pharmacies. A separate provision, Rule .2515, governs intra-pharmacy remote medication order processing arrangements. Detailed guidance on Rule .2515 is found here: Guide to Intra-Pharmacy Remote Medication Order Processing

1. **What is "remote medication order processing"?**

   RMOP is an arrangement whereby one pharmacy performs "some act in the practice of pharmacy, other than a physical act in the dispensing process, for another pharmacy that dispenses a drug, device, or medical equipment."

   The pharmacy that receives the prescription order and dispenses a drug, device, or medical equipment is the "dispensing pharmacy." The pharmacy providing RMOP services is the "remote medication order processing pharmacy."

   RMOP services include:

   (A) receiving, interpreting, or clarifying medication orders;

   (B) entering data and transferring medication order information;

   (C) performing drug regimen review;

   (D) interpreting patient clinical data to ensure proper prescription drug therapy;

   (E) performing therapeutic interventions; and

   (F) providing patient counseling or other drug information to patients and providers concerning prescriptions or drugs, devices, or medical equipment; however, if the drug, device or medical equipment is dispensed in person to the patient or the patient's agent,

an offer must be made for a pharmacist at the dispensing pharmacy to counsel the patient in accordance with the requirements of the Board's counseling rule (21 NCAC 46.2504)

2. **What are the requirements for all pharmacies involved in an RMOP arrangement?**

Permitting

Both the dispensing and remote medication order processing pharmacies must hold a current North Carolina Board of Pharmacy permit.

Common Ownership or Contractual Arrangement

Both pharmacies must either: (a) be owned by the same person or entity; or (b) have entered into a written contract that specifies the services to be provided and the responsibilities and accountabilities of each pharmacy to ensure compliance with all laws, rules, and regulations governing the practice of pharmacy.

Shared Information System

The pharmacies must either: (a) share a real-time, online database; or (b) have technology that allows access to each pharmacy's information system and to provide access to all information required to provide RMOP services in compliance with governing laws, rules and regulations.

Policy and Procedure Manual

The pharmacies must jointly develop, maintain, and follow a manual of polices and procedures that include:

(A) operation of the shared information system described above;

(B) following the dispensing pharmacy's policies regarding medication order processing;

(C) defining and ensuring the performance of each pharmacy's responsibilities;

(D) maintaining contact information for how to communicate with the pharmacies at all times when remote medication order processing services are performed;

(E) training and annual review of pharmacy personnel of the remote medication order processing pharmacy;

(F) communicating and resolving questions or problems arising during the remote medication order processing services;

(G) communicating changes in the formulary to pharmacy personnel;

(H) protecting the confidentiality and integrity of patient information;

(I) identifying the name(s), initial(s) or identification code(s) and specific activity or activity of each pharmacy personnel who perform any remote medication order processing services;

(J) complying with all state and federal laws;

(K) operating a quality improvement program designed to objectively and systematically monitor and evaluate the quality and appropriateness of patient care, to pursue opportunities to improve patient care, and resolve identified problems;

(L) updating these policies and procedures any time changes are necessary; and

(M) communicating changes in these policies and procedures to pharmacy personnel

The policy and procedure manual must be reviewed at least annually, updated as needed, and all pharmacy personnel trained on any changes.

Notification to Board

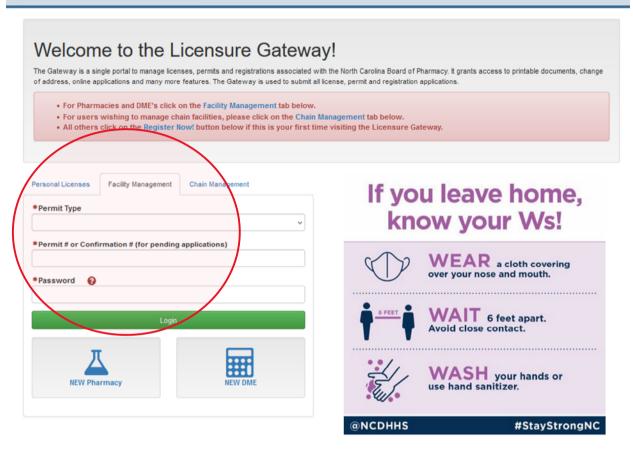The pharmacies must notify the Board before providing beginning an RMOP arrangement.

3. **How must pharmacies notify the Board prior to beginning an RMOP arrangement?**

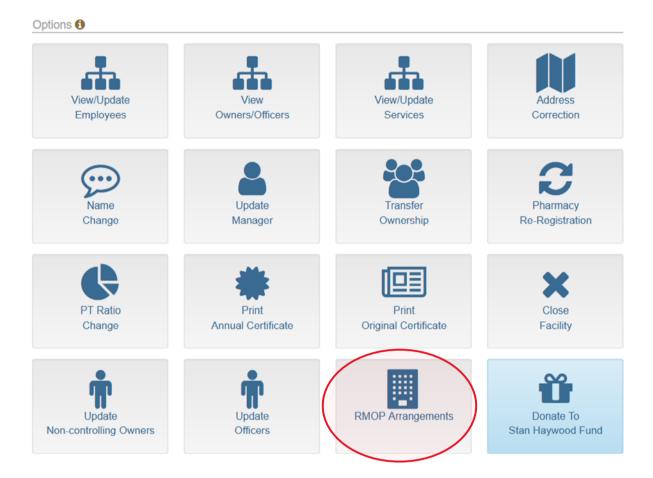The pharmacist-manager must navigate to the Board's Licensure Gateway, https://portal.ncbop.org.

Step 1: Log in under the pharmacy permit

Issued: April 26, 2022. Updated: July 11, 2022; May 8, 2024.

Step 2: Once logged in, click on the RMOP ARRANGEMENTS tile:

Options ⓘ

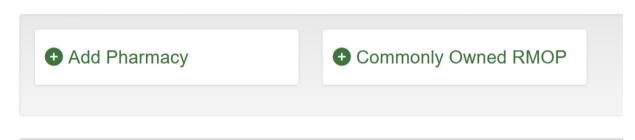|			
View/Update Employees	View Owners/Officers	View/Update Services	Address Correction
Name Change	Update Manager	Transfer Ownership	Pharmacy Re-Registration
PT Ratio Change	Print Annual Certificate	Print Original Certificate	Close Facility
Update Non-controlling Owners	Update Officers	RMOP Arrangements	Donate To Stan Haywood Fund

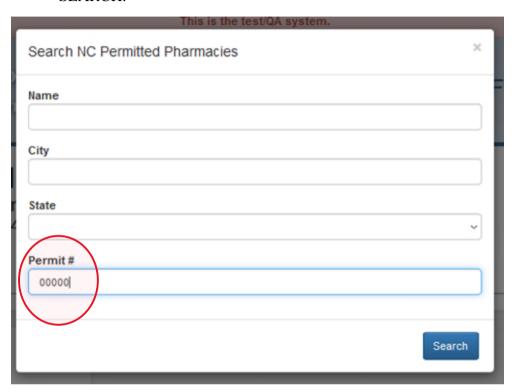**Step 3**: Select the pharmacies with whom you have an RMOP arrangement:

There are three options:

1. If two or more <u>commonly owned</u> pharmacies are going to share RMOP services, select the "Commonly Owned RMOP" tile. If all of the pharmacies sharing RMOP services, you do not need to enter those pharmacies individually. Selection of the "Commonly Owned RMOP" option is all that is required.

2. If the RMOP services arrangement includes some pharmacies that are commonly owned and some that are not, select the "Commonly Owned RMOP" tile <u>and</u> separately enter each pharmacy that is not commonly owned as shown in Step 4 below.

3. If the RMOP services arrangement is entirely among pharmacies that are not commonly owned do <u>not</u> select the "Commonly Owned RMOP" tile. Instead, separately enter each participating pharmacy as shown in Step 4 below.
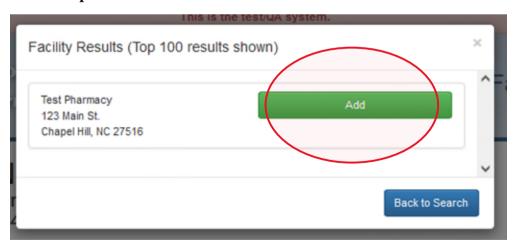
RMOP Arrangements

⊕ Add Pharmacy   ⊕ Commonly Owned RMOP

Step 4: Click the ADD PHARMACY tile to search for the NC licensed pharmacy/pharmacies with whom you have an RMOP arrangement and that are not commonly owned. The easiest, most precise way to search is by entering the pharmacy's North Carolina permit number. After you enter the five-digit permit number, click SEARCH.
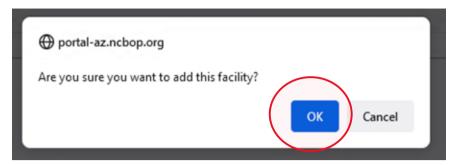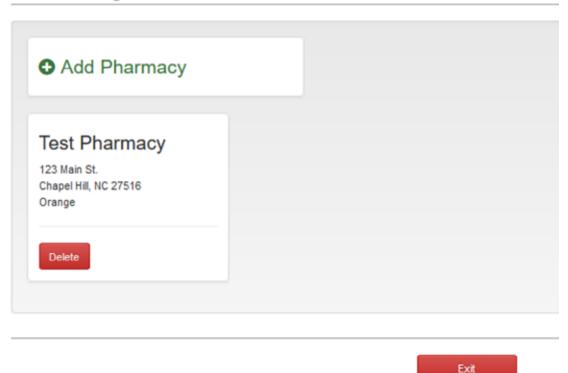

Step 5: Click ADD

Step 6: Click OK to link the pharmacy.

You may add multiple pharmacies to the RMOP arrangement list by repeating steps 4, 5, and 6.

Once you have added all pharmacies with whom you have an RMOP arrangement, click EXIT to return the main menu of the permit, and click LOGOUT to exit the Licensure Gateway.

4. **What are the requirements that apply specifically to the remote medication order entry pharmacy?**

Training

The remote medication order entry pharmacy must train all pharmacy personnel providing RMOP services on the policies and procedures specified above. The pharmacist-manager must document all training.

The pharmacist-manager must ensure that all pharmacy personnel performing RMOP services are able to perform at the same level of competence, attention, and proficiency as if those personnel were in the dispensing pharmacy.

Notification of Pharmacists Performing RMOP Services

The remote medication order processing pharmacy must notify the Board of each pharmacist who will perform RMOP services.

Here's how:

Every North Carolina-licensed pharmacist must notify the Board of place(s) of practice through the pharmacist's Licensure Gateway profile. Any North Carolina-licensed pharmacist providing RMOP services must include the remote medication order entry pharmacy in their profile.

Any pharmacist providing RMOP services who is does not hold a North Carolina license to practice pharmacy must instead hold a current NABP Verify credential (see question #6 below). An NABP Verify credential holder who will provide RMOP services must complete a registration with the Board through the Licensure Gateway. That registration requires the NABP Verify credential holder to identify the pharmacy at which they are providing RMOP services.

Including the place of RMOP practice in the North Carolina-licensed or NABP Verify-holding pharmacist profile shall be deemed notice to the Board. <u>The remote medication order dispensing pharmacy's pharmacist-manager is responsible for ensuring that the pharmacists have correctly included the place of practice in their profiles.</u>

Location of Pharmacy Personnel Performing RMOP Services

RMOP services must be provided at a site operated by a remote medication order processing pharmacy, located within the United States, and with access to the technology described above.

Services may be provided from a place (within the United States) outside of the remote medication order processing pharmacy as long as all requirements of state and federal statutes, rules, and regulations (including this rule) are met.

5. **What are the requirements that apply specifically to the dispensing pharmacy?**

Records Documenting Personnel Providing RMOP Services for a Dispensed Prescription

The dispensing pharmacy must comply with all requirements of state and federal law. The dispensing pharmacy must also maintain for three (3) years records documenting the activities of each pharmacy personnel providing RMOP services for a dispensed prescription, and the specific activity or activities performed by each person. The policies and procedures governing such documentation must be included in the required manual discussed in question #2 above.

6. **What pharmacists may provide RMOP services?**

Any pharmacist who provides RMOP services must either: (a) hold a current North Carolina license to practice pharmacy; or (b) participate in the NABP Verify service before and at all times when that pharmacist provides RMOP services.

Information on how to obtain a North Carolina license to practice pharmacy is found here.

Pharmacists who have obtained an NABP Verify credential, and who will be providing RMOP services from a remote medication order entry pharmacy, must register with the Board. Instructions on how to complete that registration are found here: How To Register As An NABP Verify Holder

Issued: April 26, 2022. Updated: July 11, 2022; May 8, 2024.

7. **What role may pharmacy technicians play in providing RMOP services?**

Registration in Home State

Pharmacy technicians may perform RMOP services only if they are registered or otherwise permitted to work as a pharmacy technician in their home state.

Information on how to obtain a North Carolina pharmacy technician registration is found here.

For technicians practicing in North Carolina-permitted pharmacies located in another state, please consult your home state board of pharmacy on registration requirements.

Scope of Services

Pharmacy technicians may assist pharmacists in providing RMOP services. But pharmacy technicians may perform only those tasks that they are both (a) permitted to perform under the laws of the state in which they are located; and (b) permitted to perform under North Carolina law regardless of where they are located.