COVID-19 INFORMATION

The Missouri Board of Pharmacy has received multiple inquiries regarding COVID-19 and potential pharmacy impact. The Missouri Department of Health and Senior Services (DHSS) has established a COVID-19 informational website that includes a variety of resources for the public and healthcare professionals, including:

- A COVID-19 Fact Sheet that includes information on symptoms and virus prevention
- CDC Guidelines for Health Care Providers, and
- A CDC “Situation Summary” on COVID-19 facts and statistics.

The DHSS website is located at https://health.mo.gov/living/healthcondiseases/communicable/novel-coronavirus/

HOTLINE:

DHSS has also established a statewide public hotline for citizens or providers needing guidance regarding COVID-19. The toll-free number is 877-435-8411. The hotline is operated by medical professionals and is available 24 hours a day, 7 days a week.

1. DOES THE BOARD HAVE ANY RECOMMENDATIONS FOR PHARMACIES AT THIS TIME?

The Board is monitoring developments on both the state and national level. Licensees should monitor the Board’s website and sign up for the Board’s e-alerts to receive important updates.

Pharmacists should use their professional judgment to ensure policies and procedures are in place to protect Missouri patients. The Board also recommends the following:

A. As always, pharmacy services must be safely and properly provided at all times. Pharmacies should take proactive steps to prevent the spread of germs and to protect Missouri patients. Proper cleaning, sanitizing and disinfection procedures must be in place. See CDC’s guidance for keeping the workplace safe.

B. The United States Environmental Protection Agency (EPA) has published an online listing of disinfectant products approved for use against SARS-COV-2, the coronavirus that causes COVID-19. The EPA list and other EPA virus related information is available online at https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2

C. Pharmacy staff should be trained on how to recognize symptoms of potential illness and what to do if they develop symptoms or come in close contact with a person known to have COVID-19. Free educational materials from DHSS and the CDC on identifying COVID-19 symptoms are available online.

D. The Board recommends establishing procedures for staff to report potential symptoms or COVID-19 exposure to pharmacy management/the pharmacist-in-charge. Pharmacy management should be trained on appropriate response measures, including, any quarantine requirements. The CDC recommends that workers stay home if they are feeling sick or have a sick family member in their home.

E. Make sure pharmacy staff are trained on and use proper handwashing techniques. CDC handwashing

2. WHAT IF A PHARMACY DECIDES TO TEMPORARILY CLOSE?

The Board recognizes that situations could occur that may require the pharmacy to temporarily close. Planning is key! The Board encourages licensees to take proactive steps to adopt emergency response plans before an actual emergency occurs.

In the event a pharmacy has to temporarily close, licensees should take proactive steps to assist patients and avoid interruptions in patient care:

A. Provide patients as much advance notification as possible. The Board recommends posting signs/notifications in a publicly visible location such as on main entry doors, near the pharmacy area and on the pharmacy’s website. Other direct patient notification options should also be considered (e.g., HIPAA compliant texts/e-mails).

B. Patients should be provided instructions and contact information for contacting the pharmacy/speaking with a pharmacist (phone number/e-mail). To avoid medication interruptions, the Board recommends providing directions for transferring prescriptions, if necessary.

C. Licensees are reminded that 20 CSR 2220-2.120(5) requires that prescription/medication order transfer requests must be completed within one (1) business day. Once again, licensees should take reasonable measures to assist patients and prevent interruptions in care if the pharmacy is unable to provide a transfer due to illness, quarantine or a closure related to COVID-19.

D. Please notify the Board if your pharmacy will be closing. Notifications can be made by calling the Board office at (573) 751-0091 or e-mailing MissouriBOP@pr.mo.gov (e-mail is preferred).

3. CAN PHARMACY STAFF WORK FROM HOME?

Missouri law doesn’t currently allow pharmacy technicians to work from home. However, the Board is considering emergency options to address/allow off-site technician non-dispensing activities in the event of an emergency. Please monitor the Board’s website and e-alerts for future updates.

FOR PHARMACISTS: 20 CSR 2220-6.055 allows pharmacists to perform non-dispensing activities outside of a licensed pharmacy. Authorized non-dispensing activities include, but are not limited to:

1) Patient counseling/education
2) Obtaining patient history/information
3) Reviewing patient records/medical histories
4) Consulting with prescribers and other healthcare professionals
5) Verifying prescription/medication order (data)
6) Clarifying prescription/medication order information
7) Patient assessment/evaluation, as authorized by Missouri law
8) Medication therapy management
9) Billing and insurance claim submissions/review
10) Drug utilization review
11) Assessing payor eligibility/coverage
12) Pharmacy compliance audits/evaluations
13) Administering drugs, vaccines, or biologicals, as authorized by law and the rules of the Board
14) Peer review/peer consultations
15) Reviewing, selecting, and developing formularies or plan/practice guidelines
16) Reviewing compliance with benefit guidelines
17) Managing inventory, including purchasing and ordering
18) Managing/reviewing information systems
19) Patient medication review
20) Patient referrals
21) Medication therapy management
22) Prescription order entry/review, provided that a pharmacist may only accept a prescription on the premises of a Missouri licensed pharmacy (see question # 4)

At this time, remote verification of the final product is not allowed under Missouri law. However, the Board is considering emergency rules to address this issue in the event of an emergency. Visit the Board’s website or sign-up for the Board’s e-alerts for future updates.

4. CAN PHARMACISTS TAKE VERBAL PRESCRIPTIONS/MEDICATION ORDERS OR CALL THE PRESCRIBER TO CLARIFY A PRESCRIPTION/MEDICATION ORDER FROM HOME?

Yes. A pharmacist can perform these activities from home or outside of a licensed pharmacy under 20 CSR 2220-6.055 (Non-Dispensing Activities). However, hard copy prescriptions and facsimile prescriptions can only be accepted at a licensed pharmacy location.

5. CAN STERILE COMPOUNDING PHARMACIES REUSE GARB IN THE EVENT OF A SHORTAGE?

Licensees have expressed concerns with potential shortages of gowns, face masks and shoe covers. The Board recommends talking with your supplier. If a shortage is anticipated, pharmacies should first consider measures to conserve supplies they have on hand. Potential measures could include limiting the number of personnel entering the buffer room/controlled area and modifying staging activities to minimize trips into the buffer room/controlled area.

If you are experiencing a shortage of garb and need to modify your procedures to allow for reuse, appropriate aseptic processes must be followed to maintain the compounding environment and to ensure the proper state of microbial control is preserved. The pharmacy’s written policies and procedures must be revised to incorporate modifications and staff should be properly trained on new requirements. To ensure compliance, staff garbing
should be assessed to ensure staff can successfully carry out any modified garbing procedures. CriticalPoint® LLC has released a webinar entitled “COVID-19: Downstream Implications for Sterile Compounding” which contains information on the reuse of garb due to a shortage. The webinar is available at https://peernetwork.criticalpoint.info/posts/webinars/covid-19-downstream-implications-for-sterile-compounding. The free Peer Network Silver subscription will give you access to the recording. Note: CriticalPoint® information is being provided for informational purposes only. The webinar was conducted by a private entity and is not officially endorsed or sponsored by the Board. Recommendations/suggestions are solely those of CriticalPoint and do not necessarily represent the opinions/recommendations of the Missouri Board of Pharmacy. In the event of a conflict, Missouri law will apply. Licensees should review 20 CSR 2220-2.200 (Sterile Compounding) in its entirety to ensure compliance with all applicable requirements.

If your facility is regulated by other agencies (e.g., the Nuclear Regulatory Commission, the Missouri Dept. of Health and Senior Services), please consult those agencies for guidance as well.

**6. WHAT ABOUT SHORTAGES OF OTHER PHARMACY SUPPLIES?**

It is difficult to determine what shortages may occur in the future (if any). However, the Board will review issues as they arise and may issue additional guidance if needed. In the interim, pharmacists should use their professional judgment to avoid interruptions in patient care and to ensure pharmacy services are safely and properly provided.