

February 21, 2020

Dear Alabama Board of Pharmacy:

The Alabama Society of Health-Systems Pharmacy (ALSHP) would like to provide our suggestions for remote order entry in the institutional pharmacy practice setting. Thank you for providing this opportunity.

- Off-site order verification should be allowed between hospitals of common ownership.
 - Each location should be permitted by the Alabama Board of Pharmacy.
 - Each location should share order verification policies and procedures.
 - Each location should use the same electronic medical record provider.
 - Remote order verification should be used:
 - to provide after hours coverage for pharmacies that are not open 24/7
 - when there is suspicion that a delay in verification would negatively impact patient care and in accordance with policy and regulations. Examples could include the following:
 - Assist the onsite pharmacist(s)
 - Unexpected changes in order volume
 - Accommodate staffing limitations and decreased availability of pharmacists at a particular facility
 - Technological issues that prevent the on-site pharmacy from processing patient orders.
- Institutional pharmacies that are not open 24/7 should be allowed to contract with another pharmacy for off-site order verification outside their hours of operation.
 - The off-site pharmacy must be permitted by the Alabama Board of Pharmacy (includes facilities that just have Pharmacy Services Permits).
 - Each facility should have joint policies and procedures surrounding off-site order verification.
- Institutional pharmacies should be allowed to contract with another pharmacy for off-site order verification for situations where there is a suspicion that a delay in verification would negatively impact patient care.
- ALSHP is in favor of the following statements taken from the Louisiana Board of Pharmacy rules: "§1527. Remote Access to Medical Orders A. Notwithstanding any provision of rules to the contrary, nothing shall prohibit a Louisiana-licensed pharmacist who is an employee of or under contract with a hospital pharmacy in Louisiana from accessing that pharmacy's dispensing information system from a location other than the pharmacy in order to process prescription drug orders or medical orders, but only when all of the following conditions are satisfied: 1. The pharmacy establishes controls to protect the privacy and security of confidential records; 2. The pharmacist does not engage in the receiving of written prescription drug orders or medical orders or the maintenance of prescription drug orders or medical orders; and 3. No part of the pharmacy's dispensing information system is duplicated, downloaded, or removed from the pharmacy's dispensing information system."

Sincerely,

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