

## **Remote Order and Prescription Entry by Pharmacy Technicians and Pharmacy Interns**

**Updated 6/5/2023**

The following Board of Pharmacy rules permit pharmacy technicians and pharmacy interns to conduct remote order and prescription entry for a licensed pharmacy located within Ohio:

- [Rule 4729:5-9-02.15 | Remote Order Entry - Technician](#) (For Institutional Pharmacies)
- [Rule 4729:5-5-25 | Remote Prescription Entry - Technician](#) (For Outpatient Pharmacies)

*For the purposes of this guidance remote order and prescription entry processing will be referred to as “remote entry.”*

To assist licensees in complying with these rules, the Board developed a set of frequently asked questions that begins on the next page of this document.

Separate remote processing guidance for pharmacists can be accessed here:

[www.pharmacy.ohio.gov/ROEpharm](http://www.pharmacy.ohio.gov/ROEpharm)

If you need additional information, you may e-mail the Board at

[contact@pharmacy.ohio.gov](mailto:contact@pharmacy.ohio.gov).

**IMPORTANT:** A pharmacy intern or pharmacy technician who is engaged in remote order/prescription entry outside the State of Ohio may only do so if authorized in the state where the pharmacist is practicing. Interns and technicians should contact their home state licensing agency before engaging in remote order/prescription entry for patients in Ohio.

## Frequently Asked Questions

### **Q1) Who needs to be licensed/registered with the Board to conduct remote entry within the state of Ohio for a pharmacy located in Ohio?**

**A1)** If conducting remote entry in the state of Ohio for an in-state pharmacy, licensees must comply with the following requirements:

- The pharmacy technician/pharmacy intern conducting remote entry in state must be licensed/registered in Ohio. For technicians this includes any registration type offered by the Board (certified, registered, or trainee).
  
- The pharmacy utilizing remote entry must be licensed and located in Ohio.

**IMPORTANT:** All pharmacy technicians and interns conducting remote entry must be employed or contracted by the dispensing pharmacy utilizing remote entry or a “remote pharmacy” that is contracted to perform remote entry on behalf of the dispensing pharmacy.

A remote pharmacy means either:

- (a) A pharmacy licensed as a terminal distributor of dangerous drugs that dispenses dangerous drugs; or
  
- (b) A pharmacy licensed as a limited category II terminal distributor of dangerous drugs that does not stock, own, or dispense any dangerous drugs and whose sole business consists of entry, review, and/or verification of prescriber orders and consulting services under contract for institutional pharmacies in this state.

*REMINDER: For the purposes of this guidance, remote order and prescription entry processing will be referred to as “remote entry.”*

**Q2) Who needs to be licensed with the Board to conduct remote entry outside of the state of Ohio for a pharmacy located in Ohio?**

**A2)** Those who live outside of Ohio that are conducting remote entry for a licensed pharmacy located in Ohio must meet the following requirements:

- The pharmacy technician must be either Ohio licensed or registered, or licensed or registered in the state where the remote entry is occurring. If working in a state that has not yet implemented a technician registration process, has received training and is working as a pharmacy technician in accordance with of the laws and regulations of their state of practice.\* **See Q3 of this document if performing remote entry for pharmacy located outside of Ohio.**
- The pharmacy intern must be licensed or registered in the state where the remote entry is occurring.
- The pharmacy utilizing remote entry must be licensed and located in Ohio.

**IMPORTANT:** All pharmacy technicians and pharmacy interns conducting remote entry must be employed or contracted by the dispensing pharmacy utilizing remote entry or a “remote pharmacy” that is contracted to perform remote services on behalf of the dispensing pharmacy.

A remote pharmacy means either:

- (a) A pharmacy licensed as a terminal distributor of dangerous drugs that dispenses dangerous drugs; or
- (b) A pharmacy licensed as a limited category II terminal distributor of dangerous drugs that does not stock, own, or dispense any dangerous drugs and whose sole business consists of entry, review, and/or verification of prescriber orders and consulting services under contract for institutional pharmacies in this state.

*REMINDER: For the purposes of this guidance, remote order and prescription entry processing will be referred to as “remote entry.”*

**\*REMINDER:** A nonresident pharmacy shall be responsible for ensuring all actions performed by an unregistered technician comply with the applicable requirements for conducting remote order entry.

**Q3) I am a pharmacy technician living in Ohio who is conducting remote entry for a pharmacy licensed out-of-state. Am I required to be registered as a pharmacy technician in Ohio?**

**A3)** No, unless required by the state in which the non-resident pharmacy is located. If not, a technician is not required to be registered if performing remote entry in Ohio for an out-of-state pharmacy. The technician must comply with any requirements of the home state where the pharmacy is located.

**Q4) What are the licensure requirements for non-resident pharmacies (i.e., those located outside of Ohio) that utilize remote entry?**

**A4)** Those who are engaged in remote entry for a non-resident pharmacy must comply with the pharmacy's home state requirements.

**Q5) Are Ohio pharmacies permitted to use staff located outside of the U.S. to conduct remote services?**

**A5)** No. Ohio's rules require remote entry to be conducted by personnel within the United States, to include the District of Columbia, the Commonwealth of Puerto Rico, or a territory or insular possession subject to the jurisdiction of the United States.

*REMINDER: For the purposes of this guidance, remote order and prescription entry processing will be referred to as "remote entry."*

**Q6) Do the rules permit pharmacy technicians and interns to conduct remote services from their homes?**

**A6)** Yes. The rules permit a pharmacy technician or pharmacy intern to conduct remote services from a remote site, which may include the person’s residence or other location where the technician or intern and the dispensing pharmacy or remote pharmacy can ensure the confidentiality and integrity of patient information, or on the premises of a dispensing pharmacy or remote pharmacy.

**Q7) What are the supervision requirements for pharmacy technicians or pharmacy interns performing remote entry?**

**A7)** Pharmacy technicians and pharmacy interns performing remote entry must be supervised remotely by a licensed pharmacist. Remote supervision means that a pharmacist directs and controls the actions of remote technicians or interns using technology to ensure a supervising pharmacist can:

- (a) Be readily available to answer questions of a remote technician; and
- (b) Be fully responsible for the practice and accuracy of the remote technician.

For remote entry conducted in state, the supervising pharmacist shall be an Ohio-licensed pharmacist. For remote entry conducted outside of Ohio, the supervising pharmacist shall be licensed in the state where the remote entry is occurring.

*REMINDER: For the purposes of this guidance, remote order and prescription entry processing will be referred to as “remote entry.”*

**Q8) What documentation is necessary to demonstrate that the dispensing pharmacy has contracted with a remote pharmacy to provide remote entry services?**

**A8)** A dispensing pharmacy may outsource remote entry services to a remote pharmacy provided the pharmacies are under common ownership or control or the dispensing pharmacy has entered into a written contract or agreement with a pharmacy that outlines the services to be provided and the responsibilities and accountabilities of each party to the contract or agreement in compliance with federal and state law, rules, and regulations.

The dispensing pharmacy and remote pharmacy must maintain a copy of the contract or agreement in a readily retrievable manner for inspection and review by an agent, inspector, or employee of the Board.

**NOTE:** If utilizing employees of the dispensing pharmacy's employees to conduct remote activities (i.e., not employing the services of a remote pharmacy), a contract is not required.

**Q9) What are the training requirements for technicians and interns conducting remote entry?**

**A9)** The responsibility of training pharmacy technicians and pharmacy interns conducting remote entry falls to the pharmacy utilizing such services (i.e., the dispensing pharmacy).

The pharmacy must ensure that all remote technicians/interns providing such services have been trained on the dispensing pharmacy's policies and procedures relating to medication order/prescription entry. The training of each technician or intern shall be documented. Additionally, the dispensing pharmacy and the remote pharmacy shall jointly develop a procedure to communicate changes in policies and procedures related to remote entry.

*REMINDER: For the purposes of this guidance, remote order and prescription entry processing will be referred to as "remote entry."*

The dispensing pharmacy may utilize one training program for all remote pharmacies under the pharmacy's common ownership and control and for all technicians/interns employed or under contract with the pharmacy utilizing remote entry.

**Q10) Is a pharmacy utilizing remote entry required to maintain a list of all personnel conducting remote entry?**

**A10)** Yes. A pharmacy utilizing technicians or pharmacy interns to conduct remote entry shall maintain or have access to a record of the name and address of each technician/intern, evidence of current licensure or registration (as applicable [see Q2](#) of this document for more information), and the address of each location where the technician/intern will be providing remote entry services.

**Q11) What are the system requirements for conducting remote entry?**

**A11)** A pharmacy utilizing pharmacy technicians or pharmacy interns to conduct remote entry shall ensure that the technician/intern conducting remote entry has secure electronic access to the pharmacy's patient information system and to other electronic systems that an on-site technician/intern has access to when the pharmacy is open.

Such systems must comply with OAC [4729:5-3-05](#) (E), which requires compliance with: The Health Insurance Portability and Accountability Act of 1996 (HIPAA) and all state and federal laws, rules and regulations regarding patient privacy.

*REMINDER: For the purposes of this guidance, remote order and prescription entry processing will be referred to as "remote entry."*

**Q12) What are the record keeping requirements for conducting remote entry?**

**A12)** Each remote entry record must comply with all recordkeeping requirements for the pharmacy utilizing remote entry (e.g., outpatient pharmacy or institutional pharmacy), including capturing the positive identification of the remote technician or intern involved in the entry of the medication order or prescription.

The pharmacy utilizing remote entry is responsible for maintaining records of all orders/prescriptions entered into their information system, including orders/prescriptions entered by a technician/intern performing remote entry. The system shall have the ability to audit the activities of technicians/interns conducting remote entry.

**Q13) Are there any requirements for a pharmacy utilizing remote entry to develop policies and procedures to ensure compliance with Ohio rules?**

**A13)** Yes. A pharmacy utilizing remote entry shall develop and implement a policy and procedure manual. A remote pharmacy shall maintain a copy of those portions of the policy and procedure manual that relate to the remote pharmacy's operations. Each manual shall include all the following:

1. Outline the responsibilities of the pharmacy utilizing remote entry and the remote pharmacy.
2. Include a list of the names, addresses, telephone numbers, and all license numbers of the pharmacies and technicians/interns involved in remote entry.
3. Include policies and procedures for:
  - (a) Protecting the confidentiality and integrity of patient information;

*REMINDER: For the purposes of this guidance, remote order and prescription entry processing will be referred to as "remote entry."*



(b) Ensuring that no patient information is duplicated, downloaded, or removed from the pharmacy's patient information system;

(c) Maintaining appropriate records of each technician or intern involved in remote entry;

(d) Complying with federal and state law, rules, and regulations; and

(e) Reviewing written policies and procedures at least every three years, or upon the implementation of a significant change of written policies and procedures, and documentation of the review.

*REMINDER: For the purposes of this guidance, remote order and prescription entry processing will be referred to as "remote entry."*