



COVID-19 Response Efforts

Updated 8/4/22

The State of Ohio Board of Pharmacy is committed to protecting the health and safety of Ohioans during the COVID-19 outbreak. This document outlines the Board’s COVID-19 guidance and response efforts, including the issuance of waivers to assist our licensees in addressing operational needs, and will be updated regularly. A full list of waivers is available starting on the page 3 of this document.

For more information on the state’s efforts to address coronavirus, visit www.coronavirus.ohio.gov or call 1-833-4-ASK-ODH.

Board Rescinds Certain COVID-19 Waivers – Effective 8/10/22

At its July 2022 meeting, the Board conducted a review of all COVID-19 waivers. As a result of this review, the following waivers will be rescinded effective August 10, 2022:

Waiver Issue Date	Description	Expiration of the Guidance
3/16/2020 – UPDATED 6/8/2020	Authorized the extension of emergency refills. This resolution can be accessed here .	RESCINDED – EFFECTIVE 8/10/22 (see new law regarding emergency refills: www.pharmacy.ohio.gov/emergency)
3/18/2020	Authorized prescribers working in an opioid treatment program licensed as a terminal distributor of dangerous drugs to temporarily delegate personally furnishing of buprenorphine products to nurses licensed under Chapter 4723. of the Revised Code.	RESCINDED – EFFECTIVE 8/10/22 – This resolution has been incorporated into rule (see OAC 4729:5-21-02).
3/18/2020 – UPDATED 4/14/2020	Authorized prescribers to delegate personally furnishing non-controlled drugs to nurses licensed in accordance with Chapter 4723. of the Revised Code. This resolution can be accessed here .	RESCINDED – EFFECTIVE 8/10/22
3/31/2020 - UPDATED 4/30/2020	Authorized the use of temporary satellite locations for the storage and use of dangerous drugs during COVID-19. This resolution can be accessed here .	RESCINDED – EFFECTIVE 8/10/22



4/17/2020	Authorized the temporary waiver of the 5 percent limit on the occasional wholesale sales of dangerous drugs by a licensed pharmacy set forth in rule 4729:5-3-09 of the Administrative Code. This resolution can be accessed here .	RESCINDED – EFFECTIVE 8/10/22
6/8/2020	Authorizes a licensed terminal distributor of dangerous drugs (TDDD) to mail or deliver non-controlled drugs to patients that have been personally furnished by a prescriber that is employed or contracted by the terminal distributor. This resolution can be accessed here .	RESCINDED – EFFECTIVE 8/10/22
12/17/2020	Temporarily suspends in-person training requirements for obtaining BLS in paragraph (M) of rule 4729:1-3-02 and (A)(3) of rule 4729:2-3-03 of the Administrative Code. For more information review the following guidance documents: <ul style="list-style-type: none"> ▪ www.pharmacy.ohio.gov/CV2020 ▪ www.pharmacy.ohio.gov/COVIDvaccine 	RESCINDED – EFFECTIVE 8/10/22
2/16/2021	Temporarily expands the pharmacy intern supervision requirements in OAC 4729:2-1-01 for interns administering COVID-19 vaccine. For more information see Q17 of this guidance document: www.pharmacy.ohio.gov/COVIDvaccine	RESCINDED – EFFECTIVE 8/10/22
1/3/2022	National Guard personnel assigned to any Ohio-licensed pharmacy may perform technician trainee activities pursuant to rule 4729:3-3-01 of the Ohio Administrative Code and any other COVID-19 wairs issued by the Board under the direct supervision of a pharmacist without registration by the Board: www.pharmacy.ohio.gov/GuardTech	RESCINDED – EFFECTIVE 8/10/22

COVID-19 Waivers and Resolutions for Licensees

To allow for licensees to adjust business operations accordingly, the State of Ohio Board of Pharmacy shall provide a minimum of 30 days’ notice prior to the rescission of any resolutions or waivers issued due to the COVID-19 pandemic. The 30-day notice requirement does not apply to any resolution that is based upon authorization of a federal agency or the Governor of the State of Ohio.

Waiver Issue Date	Description	Expiration of the Guidance
3/14/2020 – UPDATED 3/30/2020 & 6/11/2020	Authorized the compounding and sale of certain alcohol-based hand sanitizer products by Ohio-licensed pharmacies and outsourcing facilities. This resolution can be accessed here .	This resolution is in effect until rescinded by the Board or the United States Food and Drug Administration.
3/14/2020 - UPDATED 4/14/2020 & 5/15/2020	Authorized licensees conducting sterile compounding to reuse certain personal protective equipment (PPE). The waiver was updated to align with recently released PPE conservation guidance issued by the FDA. This resolution can be accessed here .	This resolution is in effect until rescinded by the Board or the United States Food and Drug Administration.
3/16/2020 – UPDATED 3/26/2020 & 6/8/2020	Authorized pharmacists, pharmacy interns, and pharmacy technicians licensed in other states to work in Ohio pharmacies under certain conditions. This resolution can be accessed here .	This resolution is in effect until rescinded by the Board.
3/16/2020 – UPDATED 3/26/2020	Authorized expedited onboarding of pharmacy technician trainees. This resolution can be accessed here .	This resolution is in effect until rescinded by the Board.
3/18/2020	Authorized home delivery of medications by opioid treatment programs under specific conditions. This resolution can be accessed here .	This guidance, as is authorized by the Drug Enforcement Administration, shall remain in effect until the Secretary of Health and Human Services (HHS) rescinds the declared public health emergency.
3/18/2020 – UPDATED 3/20/2020, 6/8/2020 & 8/31/2020	Authorized the temporary expansion of the maximum days’ supply permitted under rules 4729-9-23 and 4729:5-5-18 of the Administrative Code from 31 days to 60 days. This resolution can be accessed here .	This resolution is in effect until rescinded by the Board.
3/20/2020 – UPDATED 4/23/2020	Authorized licensees to perform sterile compounding for another licensee, referred to as central compounding. This resolution can be accessed here .	This guidance shall remain in effect until rescinded by the Board.

3/20/2020	Authorized registered pharmacy technicians to stock automated drug storage systems and send and receive copies of non-controlled prescriptions, under certain conditions. Additionally, provides clarification on the positive identification requirements for technicians transferring prescriptions. This resolution can be accessed here .	This guidance is in effect until rescinded by the Board.
3/24/2020 – UPDATED 6/8/2020 & 8/31/2020	Authorized expedited licensure of drug distributors. This resolution can be accessed here .	This resolution is in effect until rescinded by the Board.
4/3/2020, 12/1/2020 – UPDATED 1/11/2020	Permits the temporary reinstatement of lapsed or expired Ohio pharmacist licenses in Ohio under certain conditions. This resolution can be accessed here .	This resolution has been rescinded and replaced by a change in the Federal PREP Act. Click here for more information.
4/7/2020	Authorized nurses (LPN, RN, APRN) to stock automated drug storage systems within a terminal distributor of dangerous drugs that has an on-site pharmacy under certain conditions. This resolution can be accessed here .	This resolution is in effect until rescinded by the Board.
4/14/2020	Authorized an Ohio pharmacy to request a temporary waiver to permit a pharmacist to supervise up to five pharmacy technician trainees at one time (up from the current limit of three). This resolution can be accessed here .	This resolution shall remain in effect until rescinded by the Board.
4/17/2020 – UPDATED 5/15/2020	Formally adopted FDA’s “ Temporary Policy for Compounding of Certain Drugs for Hospitalized Patients by Outsourcing Facilities During the COVID-19 Public Health Emergency ” for Ohio-licensed outsourcing facilities. This resolution can be accessed here .	This guidance shall remain in effect only for the duration of the public health emergency related to COVID-19 declared by the Department of Health and Human Services (HHS), including any renewals made by the HHS Secretary in accordance with section 319(a)(2) of the Public Health Service Act (42 U.S.C. 247d(a)(2)).
4/23/2020	Formally adopted FDA’s “Temporary Policy on Repackaging or Combining Propofol Drug Products During the COVID-19 Public Health Emergency” for Ohio-licensed pharmacies,	This guidance shall remain in effect only for the duration of the public health emergency related to COVID-19 declared

	repackagers, and outsourcing facilities. This resolution can be accessed here .	by the Department of Health and Human Services (HHS), including any renewals made by the HHS Secretary in accordance with section 319(a)(2) of the Public Health Service Act (42 U.S.C. 247d(a)(2)).
7/7/2020	Formally adopted FDA's " Temporary Policy on Prescription Drug Marketing Act Requirements for Distribution of Drug Samples During the COVID-19 Public Health Emergency (June 2020) " authorizing Ohio-licensed drug distributors to deliver drug samples to a patient's home. This resolution can be accessed here .	This guidance shall remain in effect only for the duration of the Public Health Emergency related to COVID-19 declared by the Secretary of Health and Human Services (HHS) on January 31, 2020, effective January 27, 2020, including any renewals made by the HHS Secretary in accordance with section 319(a)(2) of the Public Health Service Act (PHS Act) (42 U.S.C. 247d(a)(2)).
12/14/2020	Permits registered pharmacy technicians and pharmacy technician trainees to stock automated pharmacy systems and automated drug storage systems at a location licensed as a terminal distributor of dangerous drugs, subject to certain conditions. This resolution can be accessed here .	This resolution shall remain in effect until rescinded by the Board.
12/14/2020	Authorizes the use of support personnel for packaging shipping containers and to package medications for delivery or sale. This resolution can be accessed here .	This resolution shall remain in effect until rescinded by the Board.

Licensees seeking waivers to Ohio laws and regulations governing the practice of pharmacy or distribution of dangerous drugs due to COVID-19 can submit a request to: compliance@pharmacy.ohio.gov. Please include a detailed justification for the waiver request and the expected time period.

Important COVID-19 Reminders

Compounding and Preparing Fit Test Solutions for PPE

- The Board has received several inquiries regarding the ability of pharmacies to prepare fit-test solutions for personal protective equipment. As these solutions are not considered dangerous drugs, pharmacies are permitted to compound these solutions, as long as they comply with the OSHA requirements set forth in Appendix A to §1910.134, which can be accessed [here](#).

Notification of Closures or Reduction in Hours

- As a reminder, pharmacies and other terminal distributors of dangerous drugs are not required to submit notification to the Board for any temporary closures or reduction in operating hours. If modifying hours of operation, a pharmacy is required to update signage to reflect the change in store hours.

Delivery Services

- Pharmacies are permitted to use couriers, pharmacy staff (including support staff), and other delivery services (i.e. United States postal service or common or contract carrier) to deliver patient medications. Be advised that pharmacies seeking to return drugs to stock shelves that cannot be delivered to the patient are required to have policies and procedures in place pursuant to paragraphs (B)(6) and (B)(8) of rule [4729-5-14](#) of the Administrative Code.
- Additionally, nothing in rule or law prohibits using technicians, interns or support personnel to deliver medications to patients waiting at the store (ex. for curbside pickup).

Providing Services at Alternate Locations

- Pharmacies and other locations licensed as terminal distributors of dangerous drugs can provide services outside of the pharmacy as long as they are on the physical premises of the licensed location (i.e. setting up temporary drive-thru to limit pharmacy personnel exposure, offering immunizations at another location in the store, etc.).
- Pharmacies are reminded that any drugs removed from the pharmacy to provide additional on-site services must be under the supervision of a pharmacist to deter and detect possible diversion. **NOTE:** This does not apply to dispensed medications that are being provided to patients by pharmacy technicians, interns or support personnel (for example, for curbside pickup or temporary drive thru).
- If seeking to provide services off-site (except for delivery) involving drugs, please refer to the temporary off-site requirements in rule [4729:5-3-13](#) of the Administrative Code.

Use of Signatures for Prescription Pick-Up

- Please be advised that the use of signatures for picking up a prescription is not required by Board of Pharmacy rules. For patient counseling, a verbal offer or providing an offer to counsel in writing (i.e. a telephone number where a pharmacist may be reached) is required under the [patient counseling rule](#).

Administration of Testing

- Pharmacy personnel guidance for COVID-19 testing can be accessed [here](#).

Combining Refills

- Section [4729.40](#) of the Revised Code authorizes a pharmacist who is filling or refilling a prescription that has one or more refills to dispense the drug in a quantity or amount that varies from the quantity or amount that would otherwise be dispensed. Guidance can be accessed [here](#).

Emergency Refills

- Ohio law authorizes a pharmacist to dispense medications without a prescription under certain conditions. Updated guidance can be accessed [here](#).

Pharmacist Consult Agreements

- Ohio law authorizes one or more pharmacists practicing under a consult agreement with one or more prescriber to (1) manage a patient's drug therapy (including authorizing refills) for specified diagnoses or diseases; and (2) order and evaluate diagnostic testing. Guidance can be accessed [here](#).

Boards of Health – Public Health Emergencies

- The Board has issued the following resolutions that apply to local boards of health during public health emergencies:
 - Temporary Removal of Drugs: The Board authorized a board of health, as defined in section 3701.048 of the Revised Code, that is licensed as a terminal distributor of dangerous drugs to temporarily remove dangerous drugs upon the governor's declaration of an emergency that affects public health. A complete copy of the resolution can be accessed [here](#).
 - Waiver of Wholesale Licensure Requirements: Pursuant to section 4729.25 of the Revised Code, the Board finds it is in the public's interest to waive the drug distributor licensure requirements pursuant to section 4729.52 of the Revised Code for a board of health, as defined in section 3701.048 of the Revised Code, that is licensed as a terminal distributor of dangerous drugs (TDDD) for the purpose of distributing dangerous drugs to another TDDD during a declared public health emergency or emergency preparedness incident. A complete copy of the resolution can be accessed [here](#).

Naloxone Distribution by Mail or Delivery Personnel

- The Board has authorized the distribution of naloxone via mail (or other contract carrier) or delivery personnel. A complete copy of the resolution can be accessed [here](#).