

Remote Processing During COVID-19

Survey of Boards of Pharmacy

In State -- Both Licensed

State Board Responding	Do you allow prescription drug order entry, DUR and drug order entry review processing to be completed remotely (outside a pharmacy) within your state, by an individual that IS licensed, registered or certified by your board, for a pharmacy licensed and located within your state borders?	Additional Details	Which type of individual do you allow to complete the remote prescription drug order processing activities as described in the first question?	Please provide statutory/rule reference or if authority is per Emergency Executive Order.
Alabama	Yes	With Board approval and only for pharmacists.	Pharmacist	With Board approval. Emergency Rule 680-X-2-.39ER
Alaska	Yes		Pharmacist, Intern,	https://www.commerce.alaska.gov/web/portals/5/pub/PHAFiledEmergencyRegulations4_2020.pdf
Arkansas	Other	Guidance on this is available on our website at https://pharmacyboard.arkansas.gov/covid under the Emergency Rule Suspensions header.	Pharmacist	https://pharmacyboard.arkansas.gov/Websites/pharmacy/images/COVID%2019%20Emergency%20Rule%20Suspensions%20Approved.pdf
Arizona	Yes		Pharmacist, Intern, Technician, Certified Technician	R4-23-621 (F)
California	Yes	Yes, the board has an approved waiver under specified conditions.	Pharmacist, Intern, Technician, Certified Technician	Approved waiver
Colorado	Other	Pharmacist only at this time.	Pharmacist	
District of Columbia	Other	Only Institutional Settings and must be approved	Pharmacist	DCMR 1917 only institutional setting
Georgia	Yes		Pharmacist	

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Hawaii	Yes		Pharmacist, Intern, Technician, Certified Technician	None.
Iowa	Yes		Pharmacist	
Idaho	Yes	Permitted prior to COVID	Pharmacist, Intern, Technician, Certified Technician	Rule 100 - Not expressly prohibited by federal or state law Rule 301 - Technology and location agnostic
Kansas	Yes		Pharmacist	see additional guidance regularly updated by the Board at www.pharmacy.ks.gov
Louisiana	Yes			Per rule waiver, pharmacy technicians and pharmacy interns may assist the pharmacist in remote processing, but only pharmacy can perform final check.
Massachusetts	Other	licensed in State now, but working on approval for other States license	Pharmacist	waiting for approval for remote technicians

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Minnesota	Other	Yes - but only as a matter of enforcement discretion as long as our Governor's declaration of a peacetime emergency is in effect. This is not allowed under current law. Pharmacies must notify the Board that they will be having pharmacists or technicians work remotely.	Pharmacist, Intern, Technician, Certified Technician	As noted in last question, this is not allowed under current statutes. Nor has our Governor issued an Executive Order. The Board is exercising enforcement discretion and allowing this to occur.
Missouri	Yes		Pharmacist, Intern, Technician, Certified Technician	Pharmacist is by rule. Interns and pharmacy technicians
Mississippi	Yes	Institutional only	Pharmacist	
Montana	Yes		Pharmacist	ARM 24.174.1112 Remote Medication Order Processing Services; and ARM 24.174.823 Centralized Prescription Filling and Processing of Drug Orders.
New Brunswick	Yes		Pharmacist, Intern, Technician, Certified Technician	

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North Carolina	Yes	Pursuant to emergency services waiver.	Pharmacist, Intern, Certified Pharmacy Technician	Pursuant to emergency services waiver.
North Dakota	Yes		Pharmacist	
Nebraska	Yes		Pharmacist	
New Jersey	Yes	Streamlined Remote Processing Pilot Program Request procedure is in place.	Pharmacist, Pharmacy Technician	Our rules do not address Remote Processing, so these are being approved as temporary Pilot programs
New York	Yes		Pharmacist, Intern, Pharmacy Technician	Per EO 202.11
Oklahoma	No			
Pennsylvania	Yes		Pharmacist	Emergency Executive Order: A pharmacist may provide direct or personal supervision of pharmacy interns and pharmacy technicians conducting data entry via technological means.
Rhode Island	Yes		Pharmacist, Intern, Technician, Certified Technician	
South Carolina	Yes		Pharmacist, Pharmacy Technician, Certified Pharmacy Technician	temporary board order

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South Dakota	Yes	Per policy statement on website.	Pharmacist, Intern, Technician, Certified Technician	while our policy statement does not specify, we are allowing for work remotely for pharmacists, interns, and technicians.
Tennessee	Yes		Pharmacist, Intern, Technician, Certified Technician	
Texas	Yes		Pharmacist, Pharmacy Technician	Board rule 291.32(c) https://texreg.sos.state.tx.us/public/readtac\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=22&pt=15&ch=291&rl=32
Utah	Yes		Pharmacist, Intern, Technician, Certified Technician	
Virginia	Yes		Pharmacist, Pharmacy Technician	18VAC110-20-276, 18VAC110-20-515, and emergency waivers on board website.

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Vermont	Yes	a quality assurance plan must be developed to verify and ensure maintenance of HIPAA compliant and accurate telecommunications and EMR's used.	Pharmacist	
West Virginia	Yes	Issued waiver permitting this on 3/21/2020	Pharmacist, Intern, Technician, Certified Technician	Only the pharmacist may complete the DUR
Wyoming	Other	The Board's Rules are silent about pharmacists working remotely outside of a pharmacy.		The Board's Rules are silent about working remotely outside of a pharmacy.

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Out of State -- Both Licensed

State Board Responding	Do you allow prescription drug order entry, DUR and drug order entry review to be completed remotely outside of your state, by an individual that IS licensed, registered or certified by your board, for a facility which IS licensed by your board as a nonresident pharmacy?	Additional Details	Which type of individual do you allow to complete the remote prescription drug order processing activities as described in the first question?	Please provide statutory/rule reference or if authority is per Emergency Executive Order.
Alabama	Yes	With prior Board approval by pharmacists only	Pharmacist	680-X-2-.39ER
Alaska	Yes		Pharmacist, Intern	AK Rule 12 AAC 52.445
Arkansas	Other	Not under consideration at this time as it is mainly the practice of pharmacy in another state.		
Arizona	Yes		Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	
California	Other	Issue is evolving.		Issue is under review.
Colorado	Other	Unknown at this time.		Unknown at this time.
District of Columbia	No			
Georgia	Other	The pharmacist could be in another state, but GA licensure is required.	Pharmacist	
Hawaii	Yes		Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	None
Iowa	Yes		Pharmacist	Same response as previous answer.
Idaho	Yes		Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	Rule 100 - Not expressly prohibited by federal or state law Rule 301 - Technology and location agnostic
National Association of Boards of Pharmacy®				April 9, 2020

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Kansas	Yes		Pharmacist	see additional guidance regularly updated by the Board at www.pharmacy.ks.gov
Louisiana	Yes			Pharmacy technician or pharmacy intern may assist pharmacist in remote processing, but only pharmacist can perform final check.
Massachusetts	Other	we don't license non-residents	Pharmacist, Pharmacy Technician	remote ok, but currently must be licensed in state and technicians need directly supervised by RPh. we have proposed approval of emergency measures.

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Minnesota	Other	Yes. Normally, a pharmacy would be required to submit a variance request and policies and procedures before doing so. For the duration of the peacetime emergency declared by our Governor, the Board will allow this to occur without prior approval.	Pharmacist, Pharmacy Technician, Certified Pharmacy Technician	The Board is effectively granting a variance, without requiring the submission of a variance request or policies or procedures. Several sections of rules might be involved - depending on the exact nature of the remote prescription processing.
Missouri	Yes		Pharmacist, Intern, Pharmacy Technician	Pharmacist by rule. Intern and pharmacy technician by Emergency Executive Order
Mississippi	No			

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Montana	Yes		Pharmacist	ARM 24. 174.1112, Remote Medication Order Processing Services; ARM 24.174.823 Centralized Prescription Filling and Processing of Drug Orders in combination with the pharmacy being licensed as an out-of-state mail-order pharmacy.
New Brunswick	No	not yet, but are considering		
North Carolina	Yes	Pursuant to emergency services waiver.	Pharmacist, Intern, Certified Pharmacy Technician	Pursuant to emergency services waiver.
North Dakota	Yes		Pharmacist	NDCC 43-15
Nebraska	Yes		Pharmacist	
New Jersey	Yes	As long as the state they are licensed in permits remote processing. We can also accommodate a pharmacy that is not currently licensed in NJ	Pharmacist, Pharmacy Technician	Pilot program
New York	Yes		Pharmacist, Intern, Pharmacy Technician	Per EO 202.11
Oklahoma	No			

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Pennsylvania	No	Please review the telemedicine notice posted at www.dos.pa.gov/pharm and consult with the nonresident pharmacy's resident state board of pharmacy.		
Rhode Island	Yes		Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	Emergency EO
South Carolina	Yes	temporary board order	Pharmacist	
South Dakota	Yes		Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	It is not specifically allowed via statute or rule, but we allow it.
Tennessee	Yes		Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	
Texas	Yes	If also allowed in the other state.	Pharmacist, Pharmacy Technician	
Utah	Yes		Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	

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Virginia	Yes		Pharmacist, Pharmacy Technician	18VAC110-20-276, 18VAC110-20-515, and emergency waivers on board website.
Vermont	Other	must have an out-of-state telepharmacist license with Vermont to do this	Pharmacist	
West Virginia	Yes		Pharmacist, Intern, Certified Pharmacy Technician	Only pharmacist may complete the DUR, per Board Waiver issued 3/21/2020

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Wyoming	Other	<p>There are requirements for centralized prescription processing. This may be done at pharmacies that are licensed by the Board. If out of state support is needed, those pharmacies would need to be licensed as non-resident pharmacies with the Board.</p> <p>There are requirements for institutional pharmacies that utilize off-site/after-hours order entry. Pharmacists outside Wyoming must be licensed with the Board to provide off-site/after-hours order entry for an institutional pharmacy located in Wyoming.</p>	Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	<p>There are requirements that pharmacists outside Wyoming must be licensed with the Board to provide off-site/after-hours order entry for an institutional pharmacy located in Wyoming.</p>

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Out of State -- Facility Licensed				
State Board Responding	Do you allow prescription drug order entry, DUR and drug order entry review to be completed remotely outside of your state, by an individual that IS NOT licensed, registered or certified by your board, for a facility that IS licensed by your board as a nonresident pharmacy?	Additional Details	Which type of individual do you allow to complete the remote prescription drug order processing activities as described in the first question?	Please provide statutory/rule reference or if authority is per Emergency Executive Order.
Alabama	No			
Alaska	No			
Arkansas	Other	Not a point of concern when the person and the pharmacy are both outside of our borders.		
Arizona	Yes		Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	
California	No			
Colorado	No		Pharmacist	
District of Columbia	No			
Georgia	No			
Hawaii	No			
Iowa	Yes		Pharmacist	
Idaho	Yes		Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	Rule 210, 230 and 250
Kansas	Yes		Pharmacist	see additional guidance regularly updated by the Board at www.pharmacy.ks.gov

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Out of State -- Facility Licensed				
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Louisiana	Other	Non resident PIC must be LA-licensed pharmacist, but staff is not required to be LA-licensed pharmacist.		Same as previous answers.
Massachusetts	Other	see previous answers		see previous answers
Minnesota	No	However, this might change.		
Missouri	Yes		Pharmacist	
Mississippi	No			
Montana	Yes		Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	ARM 24.173.1003 Identification of PIC of Dispensing to MT; ARM 24.174.1008 Use of pharmacy technicians by out-of-state-mail-order pharmacies.
New Brunswick	No			
North Carolina	Yes	Pursuant to emergency services waiver.	Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	
North Dakota	Yes		Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	

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Nebraska	Other	A Nebraska licensed pharmacist is required to review all prescriptions prior to being shipped.		
New Jersey	Yes	As long as their state allows remote processing	Pharmacist, Pharmacy Technician	
New York	Other	Pharmacist and Pharmacist Interns must be NY licensed and registered	Pharmacy Technicians	According to EO 202.11
Oklahoma	No			
Pennsylvania				
Rhode Island	Yes		Pharmacist	EO
South Carolina	Yes		Pharmacist	S.C. Ann 40-43-170
South Dakota	Yes	Not defined in the non-resident regulations. Nothing in rule indicates that the pharmacist must be licensed in our state.	Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	
Tennessee	Other	Interpreted under Executive Order, those individuals with licenses in good standing may do so	Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	
Texas	Yes	If allowed in the other state	Pharmacist	
Utah	Yes	They must be licensed in their home state	Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	

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Virginia	Yes		Pharmacist, Pharmacy Technician	emergency waivers on board website (18VAC110-20-276, 18VAC110-20-515)
Vermont	No	Not at this time		
West Virginia	No			
Wyoming	Yes	There are requirements for centralized prescription processing. This may be done at pharmacies that are licensed by the Board. If out of state support is needed, those pharmacies would need to be licensed as non-resident pharmacies with the Board. Staff at non-resident pharmacies providing centralized prescription processing are not required to be licensed in Wyoming.	Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	

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Out of State -- No Licenses

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Alabama	No			
Alaska	No			
Arkansas	No			
Arizona	No			
California	No			
Colorado	No			
District of Columbia	No			
Georgia	No			
Hawaii	No			
Iowa	No			
Idaho	Other	Not under current rules and statutes, but during COVID-19, temp licensure permitted if they have documentation showing registration/licensure in the home state.	Pharmacist, Intern, Pharmacy Technician, Certified Pharmacy Technician	Emergency Executive Order, Board FAQ
Kansas	No			
Louisiana	No			
Massachusetts	No	see previous answers		
Minnesota	No	However, this might change.		

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Missouri	Other	We wouldn't have jurisdiction if the activity occurs out of state, the individual is not licensed by our state and the pharmacy isn't licensed by the Board.		Board would not have jurisdiction
Mississippi	No			
Montana	No			
New Brunswick	No			
North Carolina	No			
North Dakota	No			
Nebraska	No			
New Jersey	Yes	The pharmacy must complete a non-resident application, confirm all participants are licensed as required in their home state, and complete a brief questionnaire explain how security of patient information will be maintained.	Pharmacist	permit holder
New York	No			
Oklahoma	No			
Rhode Island	No			
South Carolina	No			

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South Dakota	No			
Tennessee	Other	The facility is not addressed in the order.	Pharmacist	
Texas	No			
Utah	No			
Virginia	No			
Vermont	No			
West Virginia	No			
Wyoming	No			