



CONNECTICUT DEPARTMENT OF CONSUMER PROTECTION

DRUG CONTROL DIVISION

To pharmacists and relevant credential holders:

In order to ensure that medications are able to be dispensed, and patients do not have interruptions in their care, the Department of Consumer Protection's (DCP) Drug Control Division is permitting remote order entry and remote order entry verification while the current public health and civil preparedness emergency declarations related to COVID-19 are in effect in the State of Connecticut.

Pharmacy staff is permitted to perform **Remote Order Entry** and **Remote Order Entry Verification under the following conditions**, consistent with current pharmacy requirements:

- Each pharmacist, pharmacy technician, and pharmacy intern practicing and engaged in remote order entry and remote order entry verification must have current and appropriate credentials with the State of Connecticut.
- "Pharmacy Technician to Pharmacist" ratios and "Pharmacy Intern to Pharmacist" ratios must be maintained in accordance with current statutes and regulations enforced by the Drug Control Division.
- Medication may not leave the licensed pharmacy premises for storage outside of the licensed pharmacy premises.

Protected Health Information (PHI)

- Patient and medication information must be processed and maintained in a manner that protects each patient's PHI.
- Physical PHI must not leave the licensed pharmacy premises.
- PHI accessed during remote order entry and remote order entry verification must be protected from accidental disclosure.
- Failure to appropriately protect PHI is a violation of HIPAA and may result in disciplinary action.

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Prescription Images

- Prescriptions must have the capability to be scanned from within the licensed pharmacy premises, and an image of each scanned prescription must be able to be displayed at the remote order entry and remote order entry verification locations. The pharmacist conducting the final verification during the dispensing process must be able to view the image of each scanned prescription from within the licensed pharmacy premises.
- Prescription images must be able to be accessed at all times data entry is being conducted, whether it be from within the licensed pharmacy premises or from a remote location.

Audits

- An audit trail that identifies each appropriately credentialed pharmacist, pharmacy technician, and pharmacy intern involved in the receipt, entry, verification, and dispensation of a prescription must be available. Such audit trail must include the identity of each appropriately credentialed pharmacist conducting the final verification of each prescription during the dispensing process.

Drug Utilization Reviews (DURs)

- DURs can be done from a remote location or from within the licensed pharmacy premises but only by an appropriately credentialed pharmacist or pharmacy intern personally supervised by the appropriately credentialed pharmacist.
- A record of each DUR must be maintained that details the identity of each appropriately credentialed pharmacist conducting each DUR.

Quality Assurance Reports

- Any and all quality assurance reports must be maintained within the licensed pharmacy premises where the respective prescription was accepted for dispensing and from which such prescription was ultimately dispensed for delivery to the patient or patient's representative.
- The pharmacy at which remote order entry and remote order entry verification is conducted by appropriately credentialed individuals must be documented in any and all quality assurance reports when the prescription is dispensed with the involvement of appropriately credentialed individuals from multiple Connecticut licensed pharmacies.

The appropriately credentialed pharmacist conducting the final verification of a prescription during the dispensing process is responsible for the dispensing of such prescription in its totality.

Thank you,

Rodrick Marriott

Director

Department of Consumer Protection – Drug Control Division