

Report for State Controlled Substances Issues Related to COVID-19

Response Counts

Completion Rate:

70.4%



Complete



19

Partial



8

Totals: 27

1. Please identify your state, agency, agency address and your contact information (name, title, phone number, and email address).

State (Please use 2-letter abbreviation)

ResponseID	Response
6	Pa
7	MO
8	SC
9	South Dakota
10	IA
11	MN
13	KS
14	TX
15	LA
16	OH
17	UT
18	MS
19	GA
20	Virginia
21	CT
22	ia
24	ARIZONA
25	NV
27	NY

Agency

ResponseID	Response
6	Attorney General
7	Bureau of Narcotics and Dangerous Drugs
8	DHEC Drug Control
9	Board of Pharmacy
10	Board of Pharmacy
11	Minnesota Board of Pharmacy
13	Kansas Board of Pharmacy
14	Texas State Board of Pharmacy
15	Louisiana Board of Pharmacy
16	State of Ohio Board of Pharmacy
17	Division of Occupational & Professional Licensing
18	MS Board of Pharmacy
20	Virgina Board of Pharmacy
21	Consumer Protection
22	Board of Pharmacy
24	Arizona State Board of Pharmacy
25	Nevada Board of Pharmacy
27	Dept. of Health

Agency address

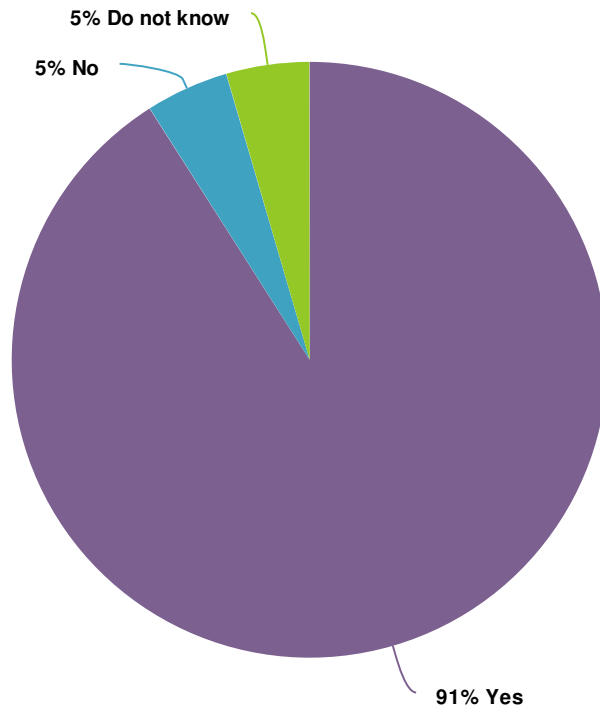
ResponseID	Response
6	Harrisburg, Pa
7	PO Box 570, Jefferson City, MO 65102
8	2600 Bull St Columbia SC
9	4001 w. Valhalla Blvd., Ste 106, Sioux Falls, SD 57106
10	400 SW 8th St., STE E
11	2829 University Ave SE Ste 530
13	800 SW Jackson, Suite 1414
14	333 Guadalupe, Suite 3-500 Austin TX 78701
15	3388 Brentwood Drive, Baton Rouge, LA 70809
16	77 S. High St. Fl. 17
17	160 E 300 S, SLC, UT 84111
18	6360 I-55N Jackson, MS 39211
19	254 Washington Street SW
20	9960 Mayland Drive, Ste 300, Henrico, VA 23233
21	450 Columbus Blvd Ste 901
22	400 SW 8th St Ste E
24	1616 W. Adams St, Suite 120
25	985 Damonte Ranch Parkway Suite 206
27	150 Broadway, Albany, NY 12204

Person completing this survey

ResponseID	Response
6	Senior Supervisory Special Agent
7	Administrator
8	Director
9	Executive Director
10	Executive Director
11	Executive Director
13	Director of Compliance
14	Executive Director
15	Assistant Executive Director
16	Chief Pharmacist
17	Chief Investigator
18	Sr. Compliance Agent
20	Executive Director
21	Director
22	Exec Officer
24	Executive Directo
25	Deputy Executive Director
27	Director

Phone number

2. During any time during the declared state of emergency due to the pandemic, did your agency pause/delay inspections ?



Value	Percent	Responses
Yes	90.9%	20
No	4.5%	1
Do not know	4.5%	1

Totals: 22

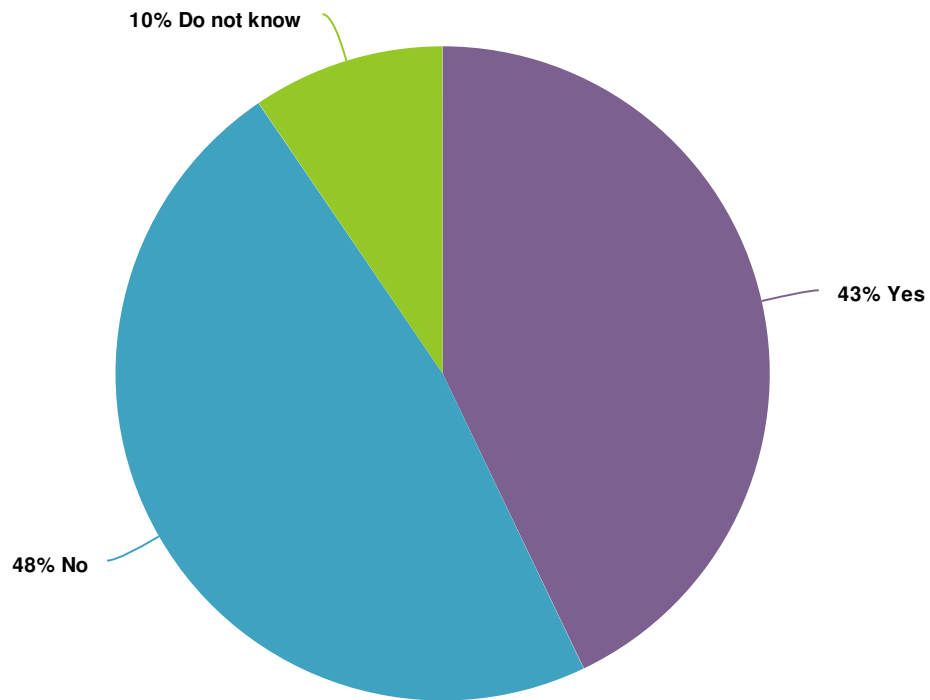
3. What date were the inspections paused/delayed ?

ResponseID	Response
7	3/28/20
8	3/15/20
9	March 12
10	on or around 3/1/20
11	March, 2020
12	March 16, 2020
13	March 16, 2020
14	3/16/2020
15	3/23/2020, exceptions were made
17	March 2020
18	March 23, 2020
19	03/18/2020
20	early March
22	3/17/2020
23	March 21, 2020
24	May 19, 2020
25	03/12/2020
27	Approximately March 13, 2020

4. What date(if you have) did the inspection process start again?

ResponseID	Response
7	7/1/20
9	July 1
10	on or around 7/1/20
11	Undetermined
12	July 2020
13	Have not
14	unsure of exact date but sometime shortly after 3/16
15	06/05/2020
17	May 2020
18	June 1, 2020
19	05/01/2020
20	routine inspections of pharmacies have not resumed yet
22	07/04/2020
23	July 27, 2020
24	June 29, 2020

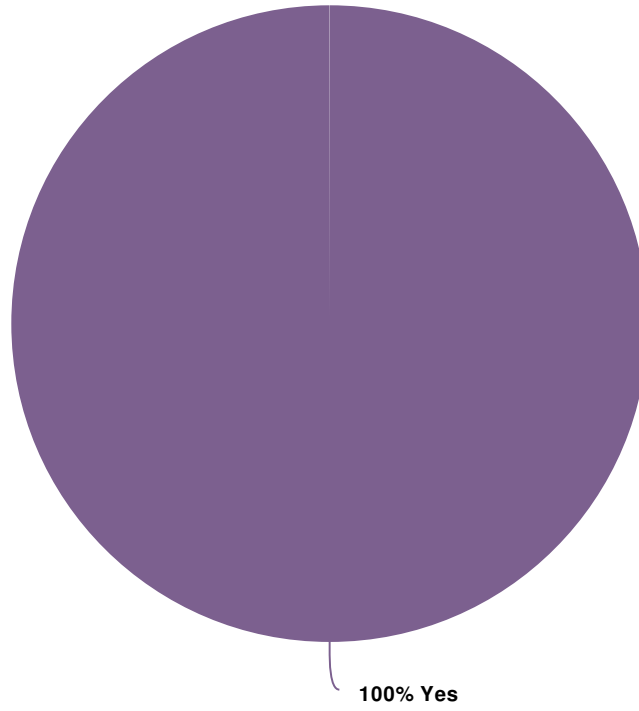
5. At any time did your agency conduct virtual inspections ?



Value	Percent	Responses
Yes	42.9%	9
No	47.6%	10
Do not know	9.5%	2

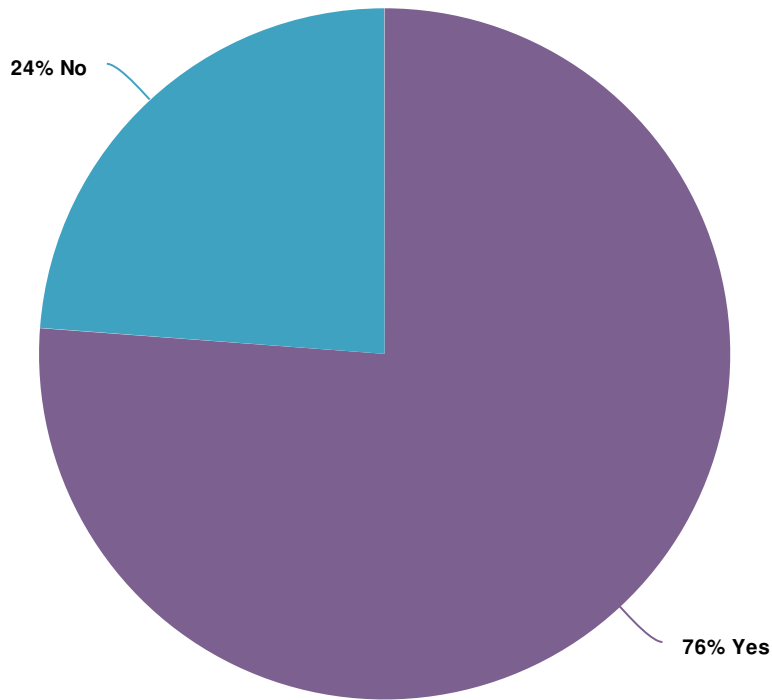
Totals: 21

6. Would you be willing to share additional information on how this was done ?



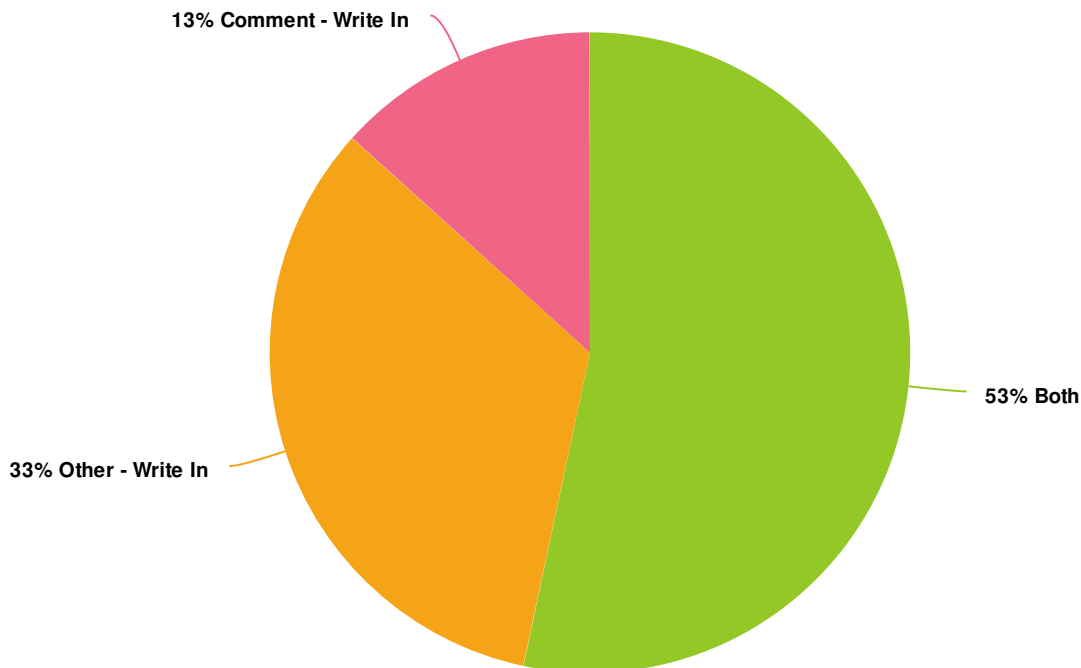
Value	Percent	Responses
Yes	100.0%	9
		Totals: 9

7. At the present time is your agency conducting on-site inspections?



Value	Percent	Responses
Yes	76.2%	16
No	23.8%	5
		Totals: 21

8. Is your agency:



Value	Percent	Responses
Both	53.3%	8
Other - Write In	33.3%	5
Comment - Write In	13.3%	2

Totals: 15

Other - Write In	Count
Mission Critical and initial license issuance inspection	1
New opening inspections & diversion investigations	1
Technically it is on a case by case basis and depending on whether the facility is allowing visitors to enter. The answer to 7 is that we are doing some in person inspections, but mostly by telephone.	1
opening, closing, diversion	1
routine inspections of certain facilities are being performed, pharmacies, phsician offices/clinics are excluded; investigations are being performed	1
Totals	5

Comment - Write In**Count**

Needs Basis, some inspections are being conducted

1

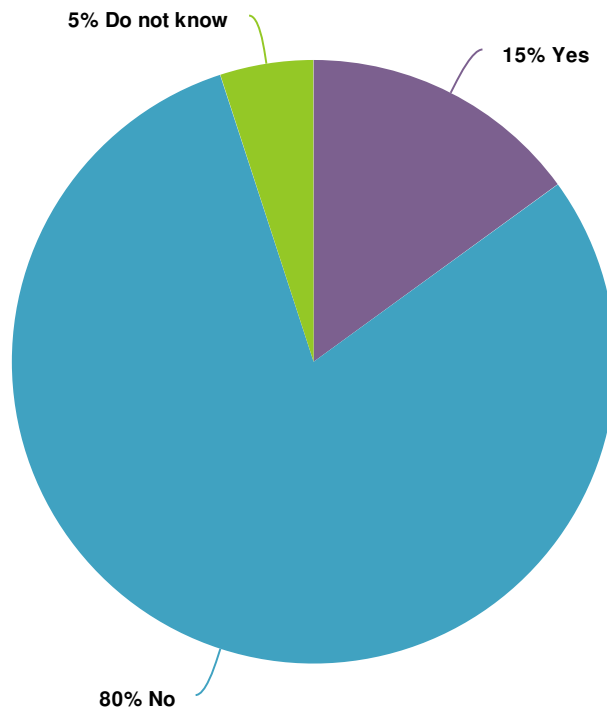
Routine sterile compounding have not been resumed




1

Totals

2

9. Has your agency waived the signature requirement for the receipt of a drug delivery from a wholesaler ?



Value		Percent	Responses
Yes		15.0%	3
No		80.0%	16
Do not know		5.0%	1

Totals: 20

10. You have indicated your agency waived the signature requirement for the receipt of a drug delivery from a wholesaler; Please describe:

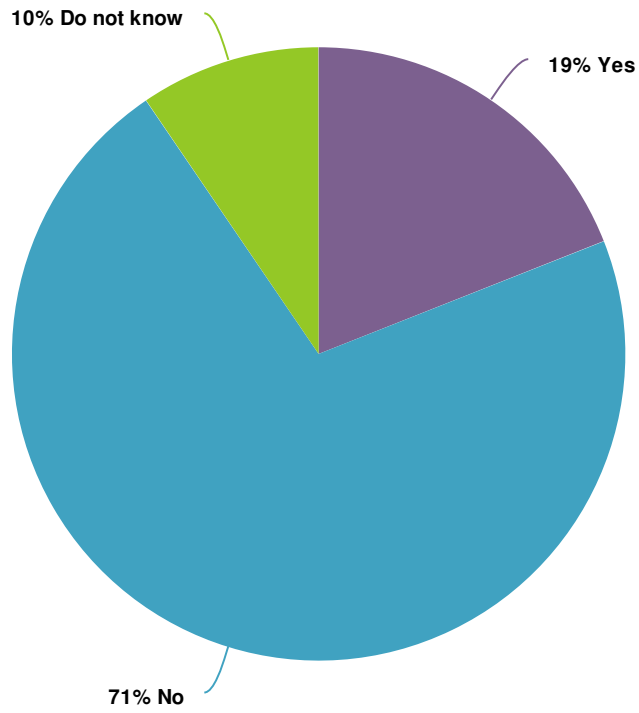
ResponseID Response




7 We require that a receipt record be kept. We do not require a written signature.

16 The board of pharmacy does not require signature at receipt of drug delivery.

18 Very receipt of order. Notate time and date order received. "COVID-19"

11. Has your agency waived the requirement for a patient's signature for a controlled substance prescription?



Value		Percent	Responses
Yes		19.0%	4
No		71.4%	15
Do not know		9.5%	2

Totals: 21

12. You have indicated your agency waived the requirement for a patient's signature for a controlled substance prescription; Please describe:

ResponseID Response

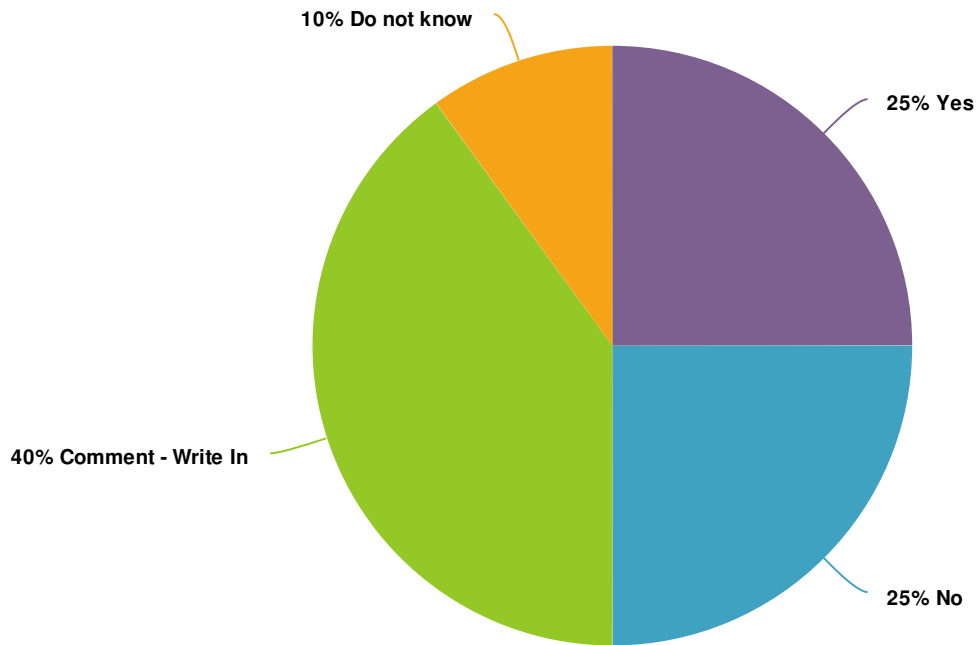
7 Our state does not require a patient's signature.


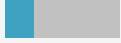


16 The board of pharmacy does not require signature for controlled substance prescription.

18 Notate on internal Pad/system

19 On 03-20-2020 the GA Board of pharmacy passed an emergency rule, 480-48-0.37 which did away with the delivery signature requirement during the COVID state of emergency in GA

13. Has your agency allowed for changes in the traditional distribution model to ensure social distancing yet continued compliance (e.g. permitting home delivery, alternate locations (eg. Vehicle). ?



Value		Percent	Responses
Yes		25.0%	5
No		25.0%	5
Comment - Write In		40.0%	8
Do not know		10.0%	2

Totals: 20

Comment - Write In	Count
Delivery has always been an option. We do not allow alternate sites.	1
These are all allowed in SD	1
We have let the business take ownership as long as they are in compliance.	1
We have never restricted this to begin with	1
home delivery was always permitted, patient counseling may be done via telephone	1
no changes in distribution model; alternate delivery of dispensed drugs is already allowed	1
not addressed by Board	1
was not restricted	1
Totals	8

14. You have indicated your agency allowed for changes in the traditional distribution model to ensure social distancing yet continued compliance (e.g. permitting home delivery, alternate locations (e.g. Vehicle): Please describe:

ResponseID Response

10 The BOP intends to utilize enforcement discretion as necessary to allow pharmacies to take care of patients appropriately even if a rule must be broken.

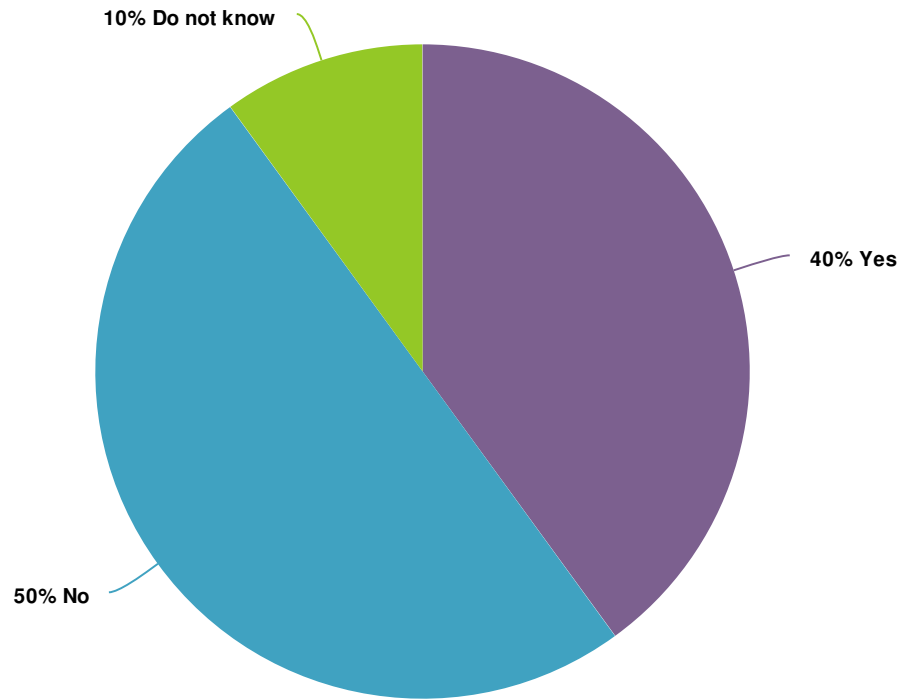
16 Permitting home delivery and other courier services, alternate location.




18 Curb side ... home delivery

23 Curb-side pick up, arranged home deliveries

25 We are utilizing the DEA's MAT guidance.

15. Has your agency allowed for the temporary registration for in-state pharmacy locations to create an alternative medication pick up or dispensing location?



Value		Percent	Responses
Yes		40.0%	8
No		50.0%	10
Do not know		10.0%	2

Totals: 20

16. You have indicated your agency allowed for the temporary registration for in-state pharmacy locations to create an alternative medication pick up or dispensing location; Please describe:

ResponseID Response

7 We have had pharmacies change some operations due to both COVID and also rioting.

9 We have a policy statement on what we call "remote drop sites" which discusses the requirements and the fact that the board would need to approve the location based upon the policies and procedures provided. This has been in effect for many years, not just since covid.

11 we have a guidance document that describes how pharmacies can operate satellites - without having to have them licensed.

12 Temporary pharmacies allowed if tied to existing registrant.

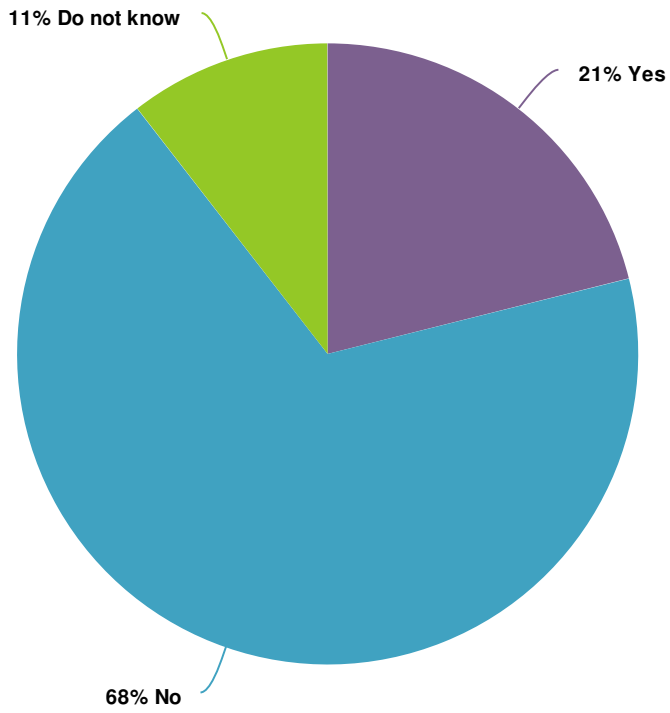
14 We have allowed for emergency pharmacy licenses but few have been issued.




16 We have allowed licensed facility to establish satellite location that relates to treatment of covid patients (make shift hospitals, quarantine homeless shelters, and alternate areas due to emergency (pandemic or during protest).

19 The GA Board has made such a allowance as Section 5. of their Policy #14: Public Emergencies which can be found on the GA Board of Pharmacy website

27 Additional info available upon request.

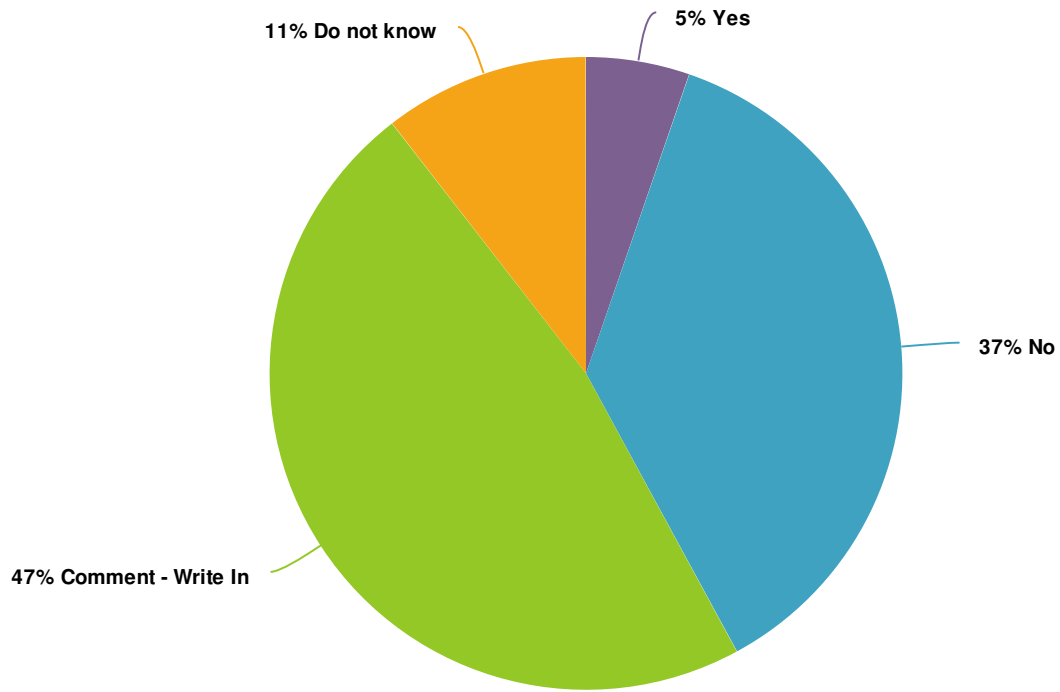
17. Since the pandemic began, has your agency issued any guidance or authorized one-time early refills of Schedule III-V prescriptions for valid refills ?



Value		Percent	Responses
Yes		21.1%	4
No		68.4%	13
Do not know		10.5%	2

Totals: 19

18. Has your agency allowed for Schedule II drugs to be filled by a verbal authorization from a prescriber ?

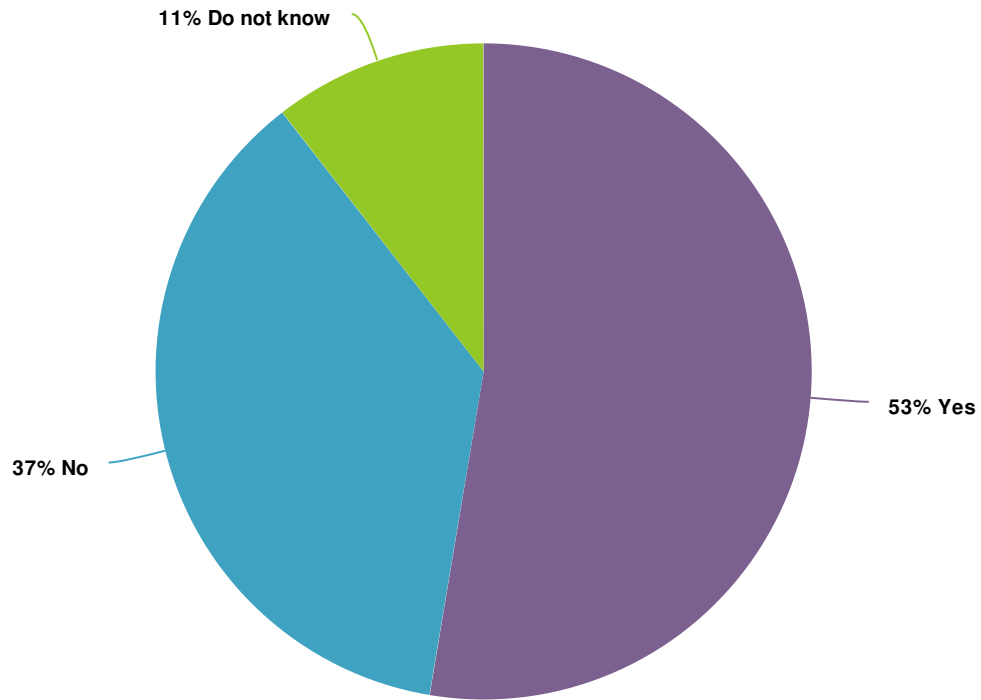





Value	Percent	Responses
Yes	5.3%	1
No	36.8%	7
Comment - Write In	47.4%	9
Do not know	10.5%	2

Totals: 19

Comment - Write In	Count
Allowed federally during pandemic.	1
Only under an emergency	1
Schedule II prescriptions can be issued as emergency prescriptions which can be verbal	1
The GA Board passed an emergency rule to mirror the DEA rule change regarding CII scripts	1
We have existing exceptions for emergency circumstances.	1
We have maintained the same requirements as the DEA	1
Yes, but still must receive hard copy	1
Yes, consistent with DEA's emergency provisions which require written follow-up prescription within 15 days	1
we follow DEA guidelines and for emergency only	1
Totals	9

19. Has your agency extended or waived license requirements (e.g. out of state wholesalers, controlled substances registrations, pharmacies) ?



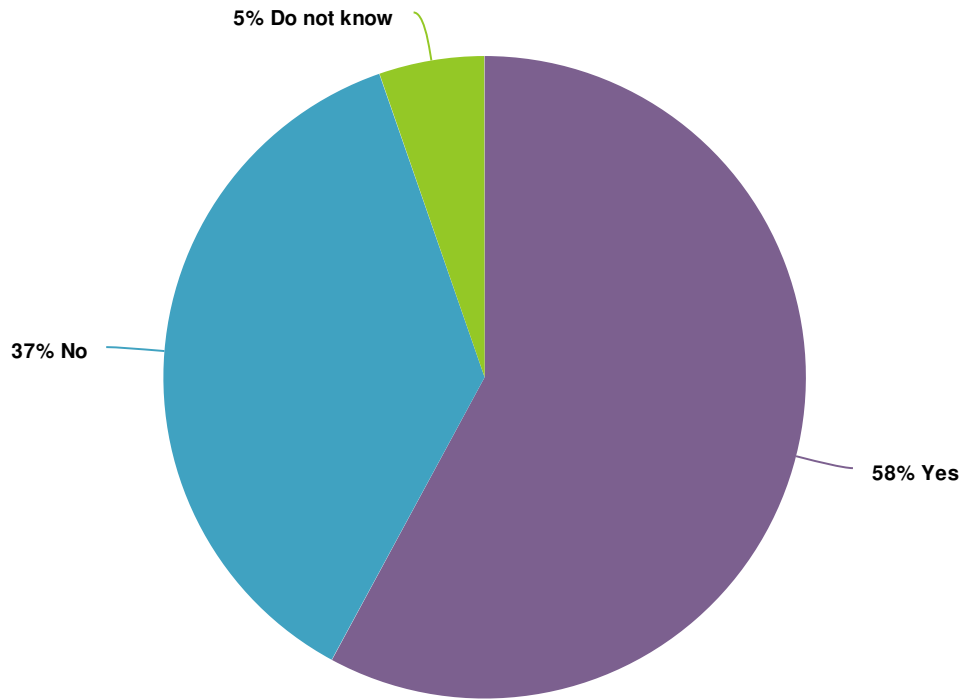
Value		Percent	Responses
Yes		52.6%	10
No		36.8%	7
Do not know		10.5%	2




Totals: 19

20. You have indicated that your agency extended or waived license requirements (e.g. out of state wholesalers, controlled substances registrations, pharmacies); Please describe:

ResponseID	Response
8	extended deadline by 30 days
9	We waived licenses for wholesale distributors and nonresident pharmacies during the pandemic. The state Health Department waived CS registrations.
10	Just for licensed people, not entities.
11	Our facility license all expire in the spring. We have allowed facilities to remain operating if they are unable to process their renewal applications on time - due to COVID-19.
14	Waived rules can be found here: https://www.pharmacy.texas.gov/coronavirus/temporary-rule-suspensions.asp
16	Authorized the sale and shipment of nonreportable dangerous drugs that are in shortage by unlicensed, out-of-state facilities.
21	non-resident pharmacies and pharmacists that are licensed in another state can practice here without a license.
22	Existing licenses and registrations that expired during the declared emergency period (currently 3/23/2020 to 7/25/2020) are extended without renewal until the end of the declared renewal; licensees/registrants/applicants required to complete on or more examinations are issued the requested license/registration on an emergency basis due to delays in testing.
24	For wholesalers and manufacturers. They are allowed to ship FDA approved products as long as they are licensed in their home state and in good standing.
25	We have issued temporary licenses and have waived license requirements for practitioners meeting a certain criteria.

21. If your state requires an inspection within a specific period of time, did your agency waive or relax this requirement?



Value		Percent	Responses
Yes		57.9%	11
No		36.8%	7
Do not know		5.3%	1

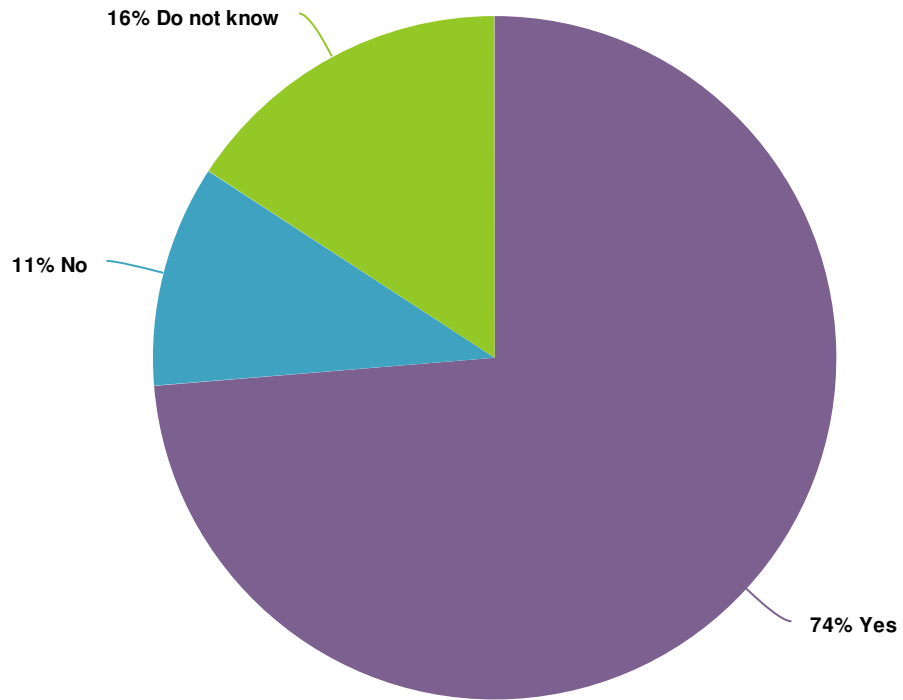
Totals: 19

22. You have indicated your state requires an inspection within a specific period of time and your agency waived or relaxed this requirement; Please describe:

ResponseID Response

11	We have been allowing some out-of-state facilities to renew if they have not been able to have an inspection due to COVID-19.
12	No time-limited inspection requirement
13	The facility could request a waiver. The waiver is temporary and when the facility receives an inspection they are to send the copy to the KBOP.
14	Pharmacies engaged in sterile compounding are required to be inspected every two years, prior to renewal. The requirement was waived by the governor (more info here: https://www.pharmacy.texas.gov/coronavirus/)
16	Due to delay with other agencies (such as FDA, and other state), we have modified the requirement.
18	LTC locations are not being inspected at this time.
20	Only applicable to nonresident pharmacies and nonresident outsourcing facilities. Current inspection required for initial registration and annual renewal. Extended allowable timeframe by 12 months for what constitutes a "current inspection".
22	Waivers for extension of time for required accreditation or inspection have been granted by the Board to some licensees (i.e. wholesalers, 3PLs) on a case-by-case basis.
25	We were not doing in-person inspections for a period and in the last month have started doing virtual inspections.
27	We exercise discretion in scheduling to give our staff opportunities to do them around their COVID assignments, and have changed the order of licensing/ inspection processes to accommodate the needs of licensees as well as the Department.

23. Has your agency allowed for remote pharmacy operations ?



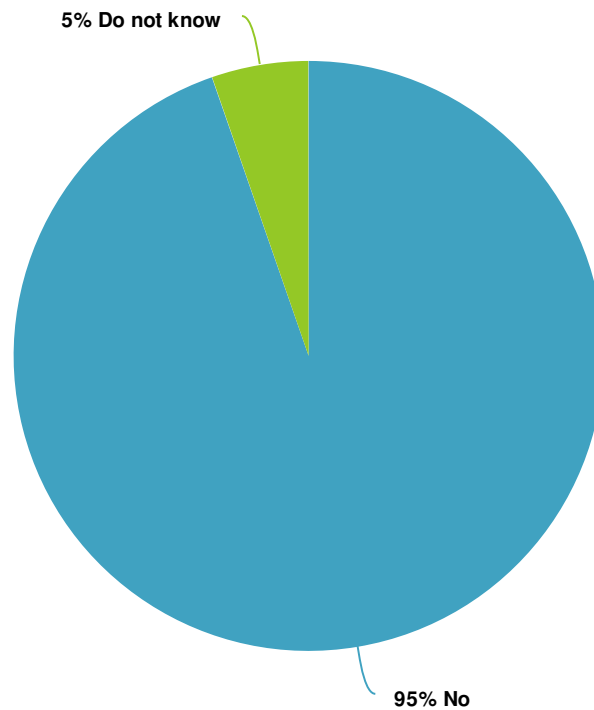
Value	Percent	Responses
Yes	73.7%	14
No	10.5%	2
Do not know	15.8%	3

Totals: 19

24. You have indicated your agency allowed for remote pharmacy operations; Please describe:

ResponseID	Response
7	The Missouri Board of Pharmacy has a new permit for remote pharmacies. These locations would need controlled substance registrations.
9	A policy statement on our website discusses remote pharmacy operations. This was there prior to covid. It was utilized more frequently during covid for both pharmacists and technicians.
10	In terms of clinical, data entry, data review, DUR or other functions that can be done by utilizing technology, yes. In terms of drug inventory and drug dispensing, no.
11	We have allowed pharmacists and technicians to work from home as long as they use appropriate equipment and take appropriate precautions to protect private data.
12	Remote processing allowed by pharmacists and technicians during public health emergency.
13	Technicians and pharmacists may work remotely IF their job function allows. Typically for technicians it is clerical in nature.
14	Pharmacists and pharmacy technicians are allowed to work remotely (except for the dispensing of prescriptions).
16	Authorized the practice of remote order entry for all licensed/registered pharmacy personnel (pharmacists, pharmacy interns, and technicians).
19	On 03/20/2020 the Governor of GA made an Executive order to allow pharmacy technicians and pharmacists to complete computer-based processing of prescriptions at alternative locations, including from the residence of the pharmacy technician or pharmacist.
20	Remote processing has always been allowed. Telepharmacy is not currently allowed.
21	we wrote guidance, the law was previously silent on the matter
22	This is not due to COVID-19. The Board licenses telepharmacies.
24	We have language for tele-pharmacy and automated dispensing kiosks.
25	The Board has temporarily authorized the practice of remote order entry for all licensed/registered pharmacy personnel (pharmacists, intern pharmacists, and pharmaceutical technicians)

25. Were there any changes to existing Prescription Monitoring Program requirements that have been implemented ?



Value	Percent	Responses
No	94.7%	18
Do not know	5.3%	1

Totals: 19

26. You have indicated there were changes to existing Prescription Monitoring Program requirements that have been implemented; Please describe:

ResponseID

Response
