

COVID-19

Pharmacy Frequently Asked Questions (FAQs)

Revisions from 3/27/2020 in Purple

Revisions from 4/3/2020 in Green

BOARD OPERATIONS

The Board office will be closed from March 21 – April 5, 2020. During that time, the Board will only provide emergency support to licensees and registrants regarding pharmacy practice and COVID-19 guidance. For assistance, please **email**:

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The information in this memo will be updated as needed. Please also refer to the Board of Pharmacy website's regular [FAQ](#) page for answers to questions.

FAQ's

Q: Is the Board of Pharmacy going to suspend the requirement for collecting the patient's signature when picking up a prescription?

A: The Kansas State Board of Pharmacy has no requirements for a patient signature when picking up a prescription. You will need to refer to your insurance contracts and PBM notices in determining what you need or can accept for patient signatures.

Q: What do we do about our quarterly documentation at our ambulatory surgery centers when they are closed or locked down?

A: We ask that you please document that you were unable to perform the quarterly review due to COVID-19. Then resume quarterly checks as soon as you are able.

Q: What do I do if I cannot get a certifier into my facility to certify my ISO areas?

A: As long as you have passed your last two certifications, the board is implementing a grace period until August 31st, 2020. During this time, the facility must continue to perform and document all required cleaning. The Board will continue to assess whether additional extensions are necessary.

Q: What if I cannot get a certifier into my facility to certify my ISO areas and we have not passed our last two certifications?

A: You will need to switch to immediate use compounding only.

Q: Has there been a change to allow any faxed C2 prescription to be used as an original during this state of emergency?

A: At this time, we have not seen any changes by the DEA to current regulations regarding the faxing of C2 prescriptions. Please monitor the DEA's website for updates to the allowances they are instituting. Procedures for physician calling of emergency C2 prescriptions have not changed at this time, either. They may prescribe only the amount necessary to treat the patient during the emergency and must provide the written prescription to the pharmacy within 7 days. The pharmacy shall notify the area DEA office if the physician fails to provide the prescription. Please see K.A.R. 68-20-19(a)(4) for more information on this subject.

Q: Where is our area DEA office?

DEA Overland Park Field Office
7600 College Blvd, Suite 100
Overland Park, KS 66210
913-951-4100

Q: Do pharmacy personnel need official letters to be deemed essential for shelter-in-place or stay-at-home orders?

A: No, these are rumors. We have confirmed with the State Emergency Operations Center team that no letters are required at this time. We recommend pharmacy personnel keep their name tag or badge with them if questions arise.

Q: Will the Board issue waivers for the 18-month inspection requirement for non-resident pharmacy renewals (22-_____) in June?

A: Yes. Requests for temporary waiver of the 18-month inspection requirement should be made in conjunction with the 2020 renewal application. Requests should include detailed documentation of steps toward completion of the inspection requirement, such as proof of pending NABP applications, emails documenting an upcoming inspection or cancellation, etc. Please do not request this waiver prior to the renewal.

Q: Can a hospital send medication, like an inhaler, home with a patient?

A: Yes, the hospital pharmacy will need to comply with the labeling requirements found in K.A.R. 68-7-14. The prescriber would need to write a discharge order stating the medication was to be labeled for take home. The pharmacy could then affix an appropriate dispensing label. Many hospitals address this through their Pharmacy and Therapeutics to label all inhalers (or other items like ointments/creams) for take home and they are sent home upon discharge UNLESS the prescriber discontinues the drug prior to discharge. Unfortunately, this means that those medications would need to reside in the pharmacy so the labels could be attached before they are sent to the floor for administration.

Q: Is the Board utilizing the new NABP Passport for obtaining emergency or temporary licenses and registrations in Kansas?

A: No, the Board is not utilizing the NABP Passport at this time. However, the Board will continue to process reciprocity applications and all other new applications.

Q: What steps are required to set up and register a pharmacy in an field hospital?

A: Complete the first three pages of the [BA-02 Pharmacy Application](#) and submit it to the Board via email to pharmacy@ks.gov. No fee is required. An inspector will reach out to the PIC's email or direct phone to schedule a virtual reopening inspection as soon as possible. Upon approval, the Board office will issue a temporary registration through August 31, 2020 which will be delivered electronically. The pharmacy can then request a temporary registration with the DEA; for information visit <https://www.deadiversion.usdoj.gov/coronavirus.html>.