



REMOTE PHARMACY SYSTEMS

Review of Current Requirements

DELIVERY SYSTEM

Definition

A structure, controlled by a pharmacy, that a patient-specific prescription is placed in for patient pick-up

Access Limitations

- Only the patient, or their agent, should be able to open the door or locker containing the patient's prescription
- Technology may need to be employed to assure only the patient, or their agent, has access to the prescription

Structure & Physical Requirements

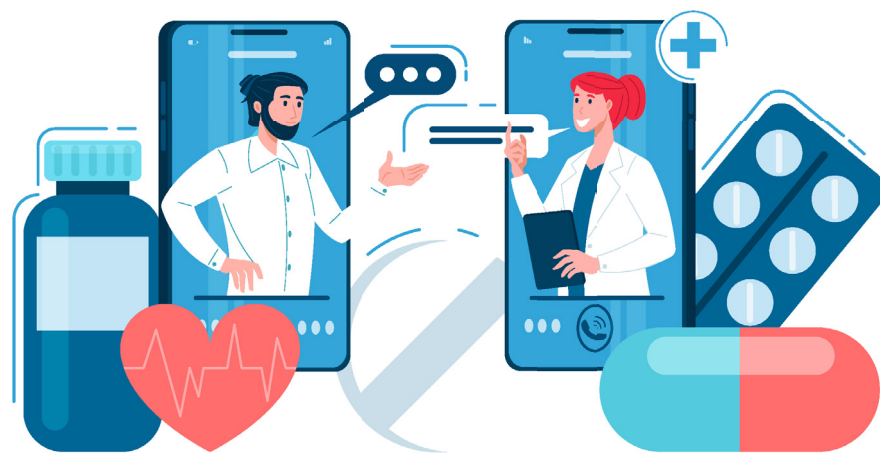
- Cannot disclose or display Protected Health Information
- Must have a system to maintain environmental controls, including temperature and humidity, to prevent drug alteration

Administrative & Operational Requirements

- Individuals picking up a schedule 2 or schedule 3 controlled substance must present an identification card belonging to the person picking up the prescription
- A log of all prescriptions delivered to the delivery system must be maintained
- The delivery system must be inventoried at least weekly, and a list of unclaimed prescriptions must be reviewed by a pharmacist
- The managing pharmacist must establish policies and procedures for stocking, determining access, and detection and mitigation of diversion and theft

Citations:

[Phar 7.41](#); [450.11 \(1b\)](#)



AUTOMATED DIRECT-TO-PATIENT DISPENSING SYSTEM

Definition

A practitioner-controlled system, typically considered a medication vending machine, from which prescriptions can be dispensed according to practitioner* dispensing laws

Access Limitations

- Only the practitioner or delegate of the practitioner can have access for stocking, inventory, and monitoring

Structure & Physical Requirements

- Must be located in a secure and professionally appropriate environment in any of the following locations:
 - » [Health care facility](#)
 - » Office or clinic of a practitioner
 - » County jail or rehabilitation facility
 - » Juvenile correctional facility

Administrative & Operational Requirements

- A supervising practitioner must be responsible for the operation of the automated direct-to-patient dispensing system and compliance with all of the requirements listed here:
 - » All dispensed prescriptions must be labeled in compliance with [Phar 7.05](#)
 - » Records of all prescription fills and dispenses must be maintained for a minimum of 5 years
 - » All monitored drugs dispensed from the system must be reported to the Wisconsin Prescription Drug Monitoring Program (PDMP)
- The practitioner or delegate of the practitioner must establish policies and procedures for stocking, determining access, and the detection and mitigation of diversion and theft



Citations:

[Phar 7.05](#); [Phar 7.11 \(1\)](#); [Phar 7.42](#); [450.09\(2\)](#)

*Practitioner means anyone who is licensed to prescribe drugs (e.g., MD, DO, APNP, PA)

REMOTE DISPENSING SITE

Definition

A licensed pharmacy where prescriptions can be filled and dispensed without a pharmacist physically present, but instead with remote pharmacist oversight.

Access Limitations

- A pharmacist, pharmacy technician, pharmacy graduate*, or certain pharmacy students** may dispense at a remote dispensing site

Structure & Physical Requirements

- May be located at any of the following locations:
 - » [Health care facility](#)
 - » Office or clinic of a practitioner
 - » County jail or rehabilitation facility
 - » Juvenile correctional facility
- Must display a sign to customers stating:
 - » *Prescriptions may be filled at this location. This store is a remote dispensing site being supervised by a pharmacist employed by:*
 - *[Insert Name of employer]*
 - *[Insert employer address]*
 - *[Insert employer telephone number]*
 - » Patient has a right to pharmacist consultation and information on how to file complaint to the board (click [here](#) for a Pharmacy Examining Board-approved consultation sign that can be printed and displayed - remote dispensing sites may also create their own sign, so long as it includes the required information)
- Dispensing cannot occur if a pharmacist is not available remotely
- Prescriptions cannot be dispensed if both the patient and pharmacist's delegate cannot communicate with a pharmacist
- A pharmacy may operate as both a traditional pharmacy and a remote dispensing site pharmacy; licensed pharmacies that meet all other remote dispensing site requirements may operate as a remote dispensing site, with remote pharmacist supervision, when a pharmacist is not present and may operate as a traditional pharmacy when a pharmacist is present.



Administrative & Operational Requirements

- Remote dispensing sites must be licensed as a pharmacy. Instructions for applying for a remote dispensing site pharmacy license can be found [here](#)
- Dispensing requirements
 - » The dispensing pharmacy professional must visually inspect all prescription orders, labels, and dispensed products
 - » The prescription label must comply with labeling requirements under [Phar 7.05](#); the name and address of the remote dispensing site should be on the label, not the address where the supervising pharmacist is located

*A pharmacy graduate is an individual who has graduated from a school of pharmacy, has submitted an application for a Wisconsin pharmacist license and is awaiting their license being issued

** Pharmacy students who have completed their second year of pharmacy school and are enrolled in an accredited pharmacy school may dispense at a remote dispensing site

- » A final check of each prescription must be completed and include the following:
 - Verification that the label is correct
 - Verification that the drug product or device is correct
 - Completion of a drug utilization review
- » The prescription record shall identify the pharmacist (or delegate or automated technology) responsible for each part of the final check
- » The remote dispensing site must comply with federal law if dispensing controlled substances
- Managing pharmacist requirements
 - » Written policies and procedures for system operation, safety, security, accuracy, and access are required
 - » An on-going quality assurance program that monitors performance that includes number of prescriptions dispensed per month, number of medication errors documented, loss or diversion, and documentation of remedial training to prevent future errors must be implemented and tracked
 - » The managing pharmacist must visit the remote dispensing location at least monthly
 - » Documentation of visits at the remote dispensing location must be maintained at the remote dispensing site for a minimum of 5 years
 - » The remote dispensing site must maintain documentation signed and dated by the managing pharmacist indicating that the managing pharmacist accepts responsibility for the site's compliance with all laws and regulations
 - » A managing pharmacist must report to the Pharmacy Examining Board (PEB) if they are responsible for 5 or more remote dispensing sites. A managing pharmacist may not be responsible for more than 10 remote dispensing sites at any given time without approval from the PEB
- Delegate requirements
 - » A pharmacy technician, pharmacy graduate*, or certain pharmacy students** may dispense at a remote dispensing site if they meet all of the following requirements to dispense remotely:
 - Be 18 years of age or older
 - Be a high school graduate or have equivalent education
 - Completed 1500 hours work as pharmacist delegate within 3 years prior to engaging in remote dispensing or completed an accredited pharmacy technician training program

Citations:

[Phar 7.05](#); [Phar 7.07](#); [Phar 7.43](#); [450.03\(1\) \(f\) \(g\)](#); [450.09\(2\)](#)

Have more questions?

Reach out to the Pharmacy Society of Wisconsin at info@pswi.org

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