

## Waiver Related to Remote Processing

In light of the Governor's [proclamation](#) of a state of emergency in response to the Palisades Fire and consistent with Business and Professions Code (BPC) section 4062, Seung Oh, President of the California State Board of Pharmacy, through delegated authority, has authorized the following waiver of specific provisions of Pharmacy Law.

### Remote Processing (BPC section 4071.1(a))

For the purposes of this waiver, "remote processing" means the entering of an order or prescription into a computer from outside of the pharmacy as defined in BPC section 4037.

In addition to the provisions of BPC section 4071.1(a), pharmacists performing remote processing may also receive, interpret, evaluate, clarify, and approve medication orders and prescriptions, including medication orders and prescriptions for controlled substances classified in Schedule II, III, IV or V. Under this waiver, remote processing may also include order entry, other data entry, performing prospective drug utilization review, interpreting clinical data, insurance processing, performing therapeutic interventions, providing drug information services, and authorizing release of medication for administration. The waiver does not include the dispensing of a drug or final product verification by remote processing.

Further, this waiver expands the provisions of BPC section 4071.1(a) to allow for remote processing by pharmacy technicians and pharmacy interns to include nondiscretionary tasks, including prescription order entry, other data entry, and insurance processing of prescriptions and medication orders for which supervision by a pharmacist is provided using remote supervision via technology that, at a minimum, ensures a pharmacist is (1) readily available to answer questions of a pharmacy intern or pharmacy technician; and (2) verify the work performed by the pharmacy intern or pharmacy technician.

### Pharmacy and Pharmacist Remote Processing Waiver Conditions

Pharmacists are permitted to conduct remote processing as permitted by this waiver if in compliance with the following:

- The pharmacist must be a California-licensed pharmacist who processes medication orders or prescriptions from a remote site.
- A California-licensed pharmacy may allow staff to engage in remote processing provided the pharmacy has policies and procedures that outline

the authorized functions to be performed. Policies and procedures must include methods for protecting the confidentiality and integrity of patient information and must expressly prohibit the printing or storage of protected health information on a device that is outside of the licensed pharmacy. Such policies must be readily retrievable and provided to the Board upon request (i.e. be able to be produced within three business days of request).

- A pharmacy utilizing remote processing shall ensure that all pharmacists providing such services have been trained on the pharmacy's policies and procedures relating to medication order, prescription processing, and remote supervision via technology that, at a minimum, ensures a pharmacist is (1) readily available to answer questions of a pharmacy intern or pharmacy technician; and (2) verify the work performed by the pharmacy intern or pharmacy technician.
- A pharmacy must ensure that any pharmacist performing remote processing shall have secure electronic access to the pharmacy's patient information system and to other electronic systems that an on-site pharmacist has access to when the pharmacy is open.
- Each remote entry record must comply with all record keeping requirements for pharmacies, including capturing the positive identification of the pharmacist involved in the remote review and verification of a medication order or prescription.
- A pharmacy utilizing remote processing is responsible for maintaining records of all medication orders and prescriptions entered into the pharmacy's information system.

#### Pharmacy Intern and Pharmacy Technician Remote Processing Waiver Conditions

Pharmacy interns and pharmacy technicians are permitted to conduct **nondiscretionary tasks** related to remote processing as permitted by the waiver if in compliance with the following:

- The pharmacy intern or pharmacy technician who enters medication orders or prescriptions from a remote site.
- A pharmacy utilizing remote processing shall ensure that all pharmacy interns and pharmacy technicians providing such services have been trained on the pharmacy's policies and procedures relating to medication order or prescription processing and remote supervision via technology that, at a minimum, ensures a pharmacist is (1) readily available to answer questions of a pharmacy intern or pharmacy technician; and (2) verify the work performed by the pharmacy intern or pharmacy technician.
- A pharmacy shall ensure that any pharmacy intern or pharmacy technician performing remote processing shall have secure electronic access to the pharmacy's patient information system and to other electronic systems to

which an on-site pharmacy intern or pharmacy technician has access when the pharmacy is open.

- Each remote entry record must comply with all record keeping requirements for pharmacies, including capturing the positive identification of the pharmacy intern or pharmacy technician involved in the authorized remote processing functions.
- A pharmacy utilizing remote processing is responsible for maintaining records of all medication orders and prescriptions entered into the pharmacy's information system.

**Effective:** January 10, 2025

**Expiration:** February 9, 2025