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WASHINGTON, DC 20002

September 25, 2024

3:02 PM – 4:36 PM

**DC Board of Pharmacy Legislative & Regulatory
Subcommittee Meeting Minutes
(WEBEX MEETING)**

Board of Pharmacy Mission Statement:

“To protect and improve the public health through the efficient and effective regulation of the practice of Pharmacy and Pharmaceutical Detailing; through the licensure of Pharmacists, Pharmaceutical Detailers, Pharmacy Interns, and Pharmacy Technicians.”

Open Session Agenda

Quorum:

Introduction:		
0925-O-01	<p>Pharmacist Scope of Practice – Priorities</p> <ul style="list-style-type: none"> ○ The order and administration of immunizations and vaccinations in accordance with the Centers for Disease Control and Prevention’s published guidelines and recommended immunization schedules for adults aged 18 and older with valid identification, adolescents and children aged 3 through 17 with written informed parental consent or without consent if authorized by District law. <ul style="list-style-type: none"> ○ <i>Discussed in next agenda item</i> ○ Initiation of Pre Exposure Prophylaxis (PrEP) and Post exposure Prophylaxis (PEP) for the prevention of HIV/AIDS pursuant to a protocol <ul style="list-style-type: none"> ○ <i>14 states where pharmacists can initiate PrEP and PEP – Dr. Friedman made a PDF with comparisons</i> ○ <i>To be shared via email with plan to come to next meeting to reach a consensus</i> ○ <i>Ms. Williams likes NV (does not mention a protocol. Do we need a DOH protocol for DC to use?)</i> ○ Extending prescriptions as medically necessary, excluding controlled substances or specialized medications. <ul style="list-style-type: none"> ○ <i>Discussed emergency Fill Regulations (from other jurisdictions)</i> ○ <i>Difference between emergency refill and governor-declared state of emergency (addressed by 3 jurisdictions)</i> ○ <i>Ms. Williams to investigate the meaning of "specialized" medications in HORA so that this can be defined in our new regs</i> ○ <i>CA – RPh can refill if prescriber is unavailable if RPh believes patient's ongoing care will be interrupted and have significant adverse effect on the patient's well-being</i> <ul style="list-style-type: none"> ▪ <i>Inform prescriber within a "reasonable" period of time (or should there be a specified timeline?)</i> ▪ <i>Documentation of inability to reach prescriber</i> ○ <i>DE – may dispense emergency supply if the supply dispensed is for an emergency period, prescriber is not available, medication is essential for continuation of therapy for a chronic condition, prescription was originally dispensed at the pharmacy</i> 	

- Only allows emergency supply "1 time"
- FL – up to 72-hour supply
 - Insulin mentioned separately – not to exceed 3 emergency refills/year
 - 30-day supply allowed in a state of emergency declared by Governor
- MD – different conditions when pharmacist can extend a prescription are spelled out in the regulations
 - Notify prescriber within 72 hours of dispensing
 - May only provide 1 refill of the prescription and not exceed 14-day supply or unit of use
- PA – Unlawful for a pharmacist to dispense an emergency prescription unless...
 - Notify prescriber within 72 hours
 - Amount not to exceed 30 days if not sold in a 72-hour supply
- RI
 - Up to 90 day supply
 - Notify prescriber within a reasonable time
- SC
 - Up to 14-day supply once per year (up to 30-day quantity for bulk products)
 - Notify prescriber within reasonable time, but no later than 10 days
- VA
 - Authorization to refill only requires the label of the prescription
 - Must inform the patient that you're refilling without the prescriber's authorization
 - Rationale, unavailability, date must be noted on the prescription
- WY
 - Up to 72-hour supply or the smallest available unit
 - Pharmacist is not "required" to refill
- VT - "Short-term prescribing by pharmacists"
 - 20-4-26:3. Short-term Prescribing by Pharmacists

Currentness

<Emergency action effective July 01, 2021 and expires Dec. 28, 2021.>

A pharmacist extending a previous prescription shall do so in a manner consistent with [26 V.S.A. § 2023\(b\)\(6\)](#) and only after taking steps reasonable under the circumstances to verify a patient's claim to hold an established prescription. Short-term prescribing of controlled drugs is prohibited. When determining whether short-term prescribing is clinically appropriate, a pharmacist shall consider the risk profile of a drug, including potential toxicity and misuse, and shall weigh potential risks against risks associated with interruption of access.

(6) Short-term extensions.

	<p><i>(A) A pharmacist may extend a previous prescription in the absence of a collaborative practice agreement or a State protocol so long as the pharmacist provides only sufficient quantity to the patient until the patient is able to consult with another practitioner, not to exceed a five-day supply or the smallest available unit, and takes all reasonable measures to notify the patient's primary care provider of record or the appropriate original prescriber, if the original prescriber is different from the primary care provider of record.</i></p> <p><i>(B) A short-term extension shall be provided on a one-time basis.</i></p> <p>(Suggested By Executive Director based off stakeholder inquires)</p>	
0925-O-02	<p>Review of Title 17 District of Columbia Municipal Regulations for Pharmacists § 6512</p> <ul style="list-style-type: none"> ○ <i>Ms. Willams shared edits necessary for Chapter 65, Section 6512</i> ○ <i>Repeal 6512.5, 6512.6, 6512.7, 6512.8, 6512.15</i> ○ <i>Modify 6512.12 - no longer restricted to COVID and influenza – language for interns and technicians is the same as that for pharmacists</i> ○ <i>6512.19 - Pharmacy must have a written protocol addressing anaphylaxis treatment – Ms. Williams will clean up this section</i> ○ <i>6512.20 - remove reference to written protocol</i> ○ <i>9910.2 - Add administration of immunizations and vaccinations (language as set for in HORA) to scope of practice of a technician</i> ○ <i>9910.3 - Repeal vaccination or immunization administration</i> ○ <i>Discussion on whether to add a requirement for pharmacy technicians to complete vaccination continuing education – will pose as a question to full Board</i> 	
0925-O-03	<p>Action Items/Next Steps</p> <ul style="list-style-type: none"> ○ Mr. Friedman to pull together draft for extending prescriptions based on review of other states for this committee to review ○ Mr. Friedman to send PrEP and PEP information to the committee for review prior to next meeting 	
<u>Comments from the Public</u>	None	

This concludes the Public Open Session of the DC Board of Pharmacy Legislative & Regulatory Subcommittee meeting.

Open Session Meeting Adjourned at 4:36 PM

This meeting is governed by the Open Meetings Act. Please address any questions or complaints arising under this meeting to the Office of Open Government at opengovoffice@dc.gov.