

Remote Order Entry by Technicians Policy and Procedure 151

The SC Board of Pharmacy interprets ‘direct supervision’ and ‘personal supervision’ as stated in the SC Pharmacy Practice Act and its corresponding regulations and policies to allow remote order entry by technicians registered with the SC BOP when the best practices listed below are being utilized and are being supervised by a SC licensed pharmacist:

- 1. Use of a Secured Access (ie. Virtual Private Network (VPN))**
 - a. Definition- A set of authorized users on a public network such as the internet that communicate among themselves using encryption technology so that their messages are as safe from being intercepted and understood by unauthorized users as if the authorized users were connected by private lines.
- 2. Data Restrictions**
 - a. No Data should reside on any workstation being used for remote order entry and the operating system should prevent any personal health information from being printed or retrieved from the workstation.
- 3. Use of a Two-Point User Authentication**
 - a. Each user should first identify themselves through a VPN secure token access before using their unique credentials to access the operating system.
- 4. Use of a Unique User ID**
 - a. Each user receives a unique user ID and should establish a complex password for identification and audit tracking.
- 5. Lock Out Process**
 - a. If no activity is detected for a set period of time, the system should automatically sign off the user until they go through the sign on process to re-establish connection.
- 6. Training**
 - a. Only SC registered technicians who have been properly trained should be eligible to work from a remote alternative worksite. While not required, it is encouraged that the technician be State and Nationally Certified.

• This policy does not waive, limit, or dissolve any requirements mandated by the Board, in its rules and regulations, regarding supervision of pharmacy technician functions or the role of a pharmacist in dispensing processes.

1. Definitions

- A. “Remote Order Entry” may include any of the activities performed by a pharmacy technician registered with the SC BOP from a remote location (may include an unpermitted site) as referenced in Policy # 140:
- B. Remote Order Entry by a technician does not allow a remote technician to store, maintain, or compound any prescription drugs or devices.
- C. Remote Order Entry by a technician does not allow a remote technician to administer immunizations without the physical presence of a SC licensed Pharmacist.

2. General Requirements.

- A. An entity may utilize remote order entry if the SC registered remote technician performing the remote order entry has access to or shares a common electronic file such that the technician performing remote order entry has sufficient patient information.
 - i. The technician may be employed or contracted by the entity as well as employed by a contractor of the entity to provide remote order entry from a physical location in or outside South Carolina.
 - 1. The technician must be a registered SC technician.
 - 2. The entity must have a written agreement or contract with the SC registered technician. The written agreement or contract shall:
 - a. Outline the services to be provided;
 - b. Delineate the responsibilities of each party including compliance with federal and state laws and regulations governing the practice of pharmacy as well as state and federal medical privacy requirements including compliance with applicable Federal HIPAA regulations;
 - c. Require that the parties adopt a policies and procedures manual.
 - d. Provide that the parties have access to or share a common electronic file such that the technician performing remote order entry has sufficient patient information.
- B. An entity utilizing remote order entry by technicians is required to act in accordance with section 40-43-86(B)(4)(b) and (c) of the SC Pharmacy Practice Act. Remote technicians engaging in data entry from a remote alternative worksite **are** included in the ratio requirements set forth in statute.
- C. All SC registered remote technicians working at remote worksites shall comply with all applicable Federal and State laws and regulations and all shall be registered in South Carolina and supervised by a pharmacist licensed in South Carolina.

3. Policies and Procedures. A policies and procedures manual shall:

- A. Be accessible to each party involved in remote order entry.
- B. Be available for inspection by the Board or an authorized agent of the Department;
- C. Outline the responsibilities of each party involved in remote order entry;

- D. Include a current list of the name, address, contact information, and registration number of each SC registered remote technician involved in remote order entry.
- E. Include policies and procedures for:
 - i. Ensuring the security and privacy of confidential patient records, including compliance with applicable Federal HIPAA regulations;
 - ii. Ensuring that effective communication channels must be established and regularly utilized between the SC registered remote technician, SC BOP permitted facility, supervising pharmacist, and healthcare providers on site.
 - iii. Maintaining records to identify the name, initials, or identification code of each person who performs a processing function for a medication order.
 - iv. Complying with federal and state laws and regulations.
 - v. Operating or participating in a continuous quality improvement program for pharmacy services designed to objectively and systematically monitor and evaluate the quality and appropriateness of patient care, pursue opportunities to improve patient care, and prevent and document medication errors.
 - vi. Training and orientation for all personnel involved in the remote order entry.
 - vii. Annual review of policies and procedures with documentation of review.

4. Records.

- A. The entity involved in remote order entry shall maintain a record that identifies the name, initials, or identification code of each person who performed a processing function for every medication order.
- B. The record may be maintained in a common electronic file if the record is maintained in such a manner that the data processing system can identify every person who performed a processing function for a medication order.
- C. The record shall be readily retrievable for at least two years from the last action taken on the prescription. The record shall be available for inspection by the Board or an authorized agent of the Department upon request.

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