

## Considerations for Temporary Waivers or Changes to Promote Pharmacy Access and Flexibility

*To help empower pharmacy professionals to support our nation's COVID-19 response, pharmacy benefit managers (PBMs) are supporting policy solutions that ease operational barriers and address temporary challenges facing the pharmacy workforce.*

**In response to guidance from federal, state, and local public health agencies, including shelter-in-place requirements, many PBMs have transitioned staff to virtual and home-based work environments, including pharmacy professionals supporting mail-order and specialty pharmacies.** Such action has not only supported the health and safety of staff, but also facilitated services continuity and access to care for patients during this time of need.

**In response to governors' emergency orders and declarations, some State Boards of Pharmacy have authorized temporary waivers or changes to existing pharmacy regulations.** Many of these actions, including waivers to allow pharmacy professionals to process prescriptions and medication orders from a remote location, are needed to sustain continuity and access to care for patients served by these professionals.

**PCMA recommends states, through their Boards of Pharmacy, provide pharmacy professionals with increased workflow flexibility to deliver essential services to those impacted by COVID-19, including by temporarily:**

- **Allowing pharmacists and pharmacy technicians with valid licenses/certifications to operate across state lines**, including to support a pharmacy in states other than where their license was issued;
- **Authorizing pharmacists and pharmacy staff to conduct routine pharmacy tasks remotely when the technology allows** (i.e., prescription data entry and script verification), including those licensed outside the state and including technicians, so long as their work is verified electronically by the supervising pharmacist;
- **Issuing licensing waivers and expediting conditional approval for pharmacy technician duties, such as allowing pharmacy technician trainee applicants to perform pharmacy technician functions *while* their application is being reviewed** by the Board of Pharmacy (e.g., the state of Ohio is granting "In-Review – Conditional Approval" within 2 business days);
- **Waiving pharmacy technician ratios or allowing the supervising pharmacist to expand the ratio at their discretion;**
- **Waiving proof-of-receipt (signature) requirements;** and
- **Ensuring pharmacy professionals are designated essential personnel** with freedom of movement during shelter-in-place and similar requirements and for purposes of priority access to COVID-19 testing.

**These areas are the most urgent and relevant to the current situation; further flexibilities may be important as the weeks progress.**