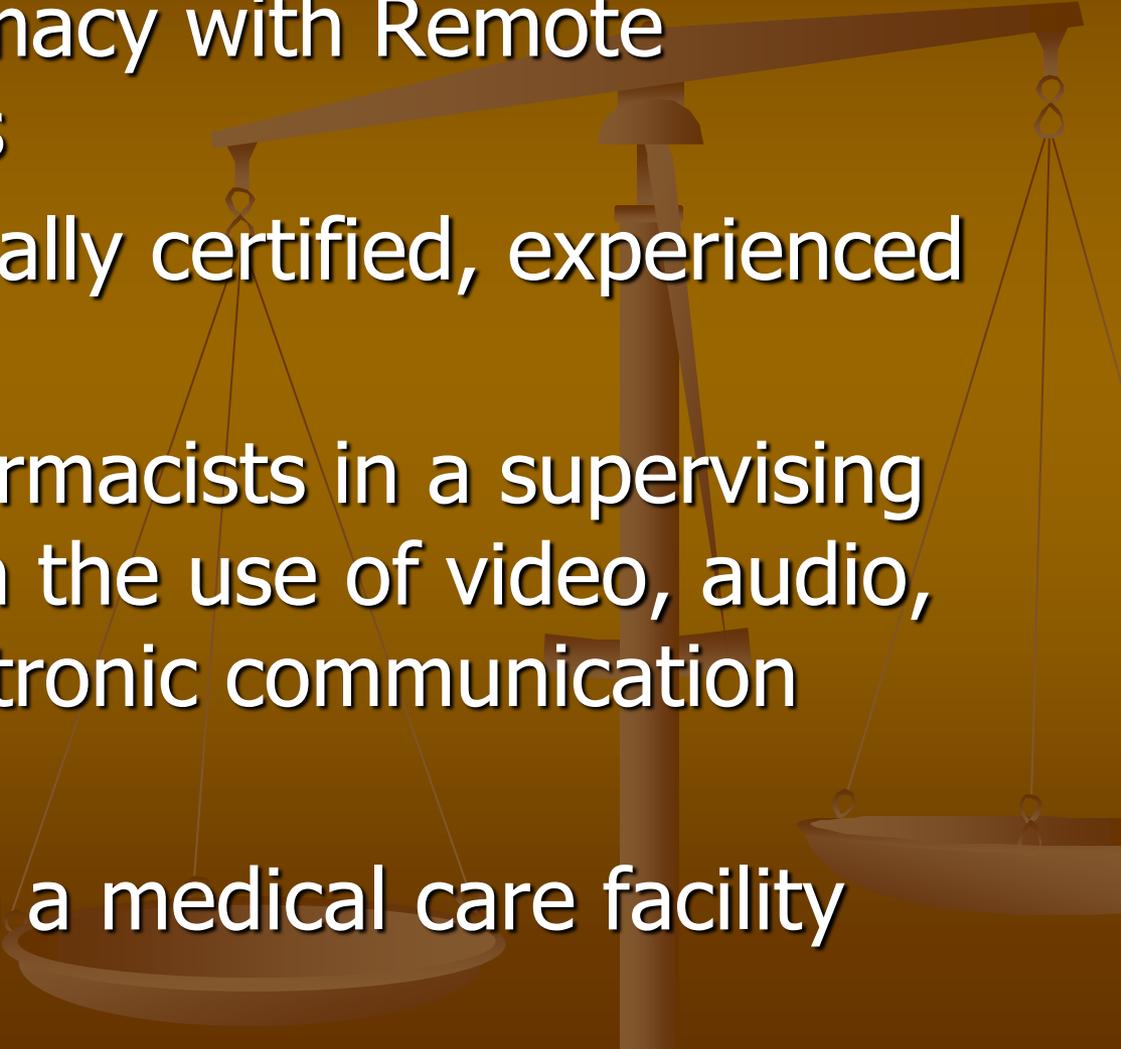


# Idaho Telehealth Council



Mark Johnston  
Executive Director  
Idaho State Board of Pharmacy

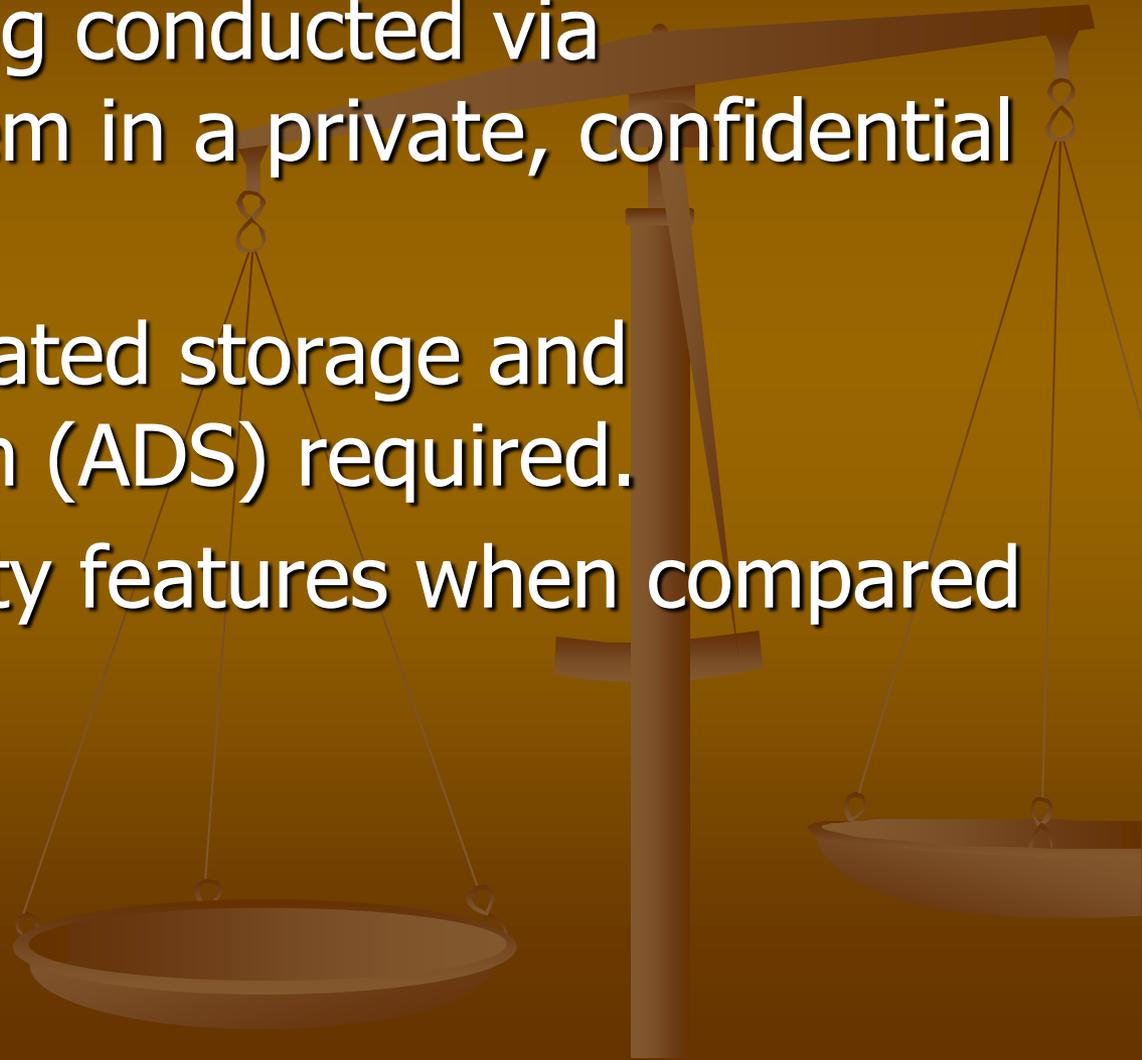
# Telepharmacy



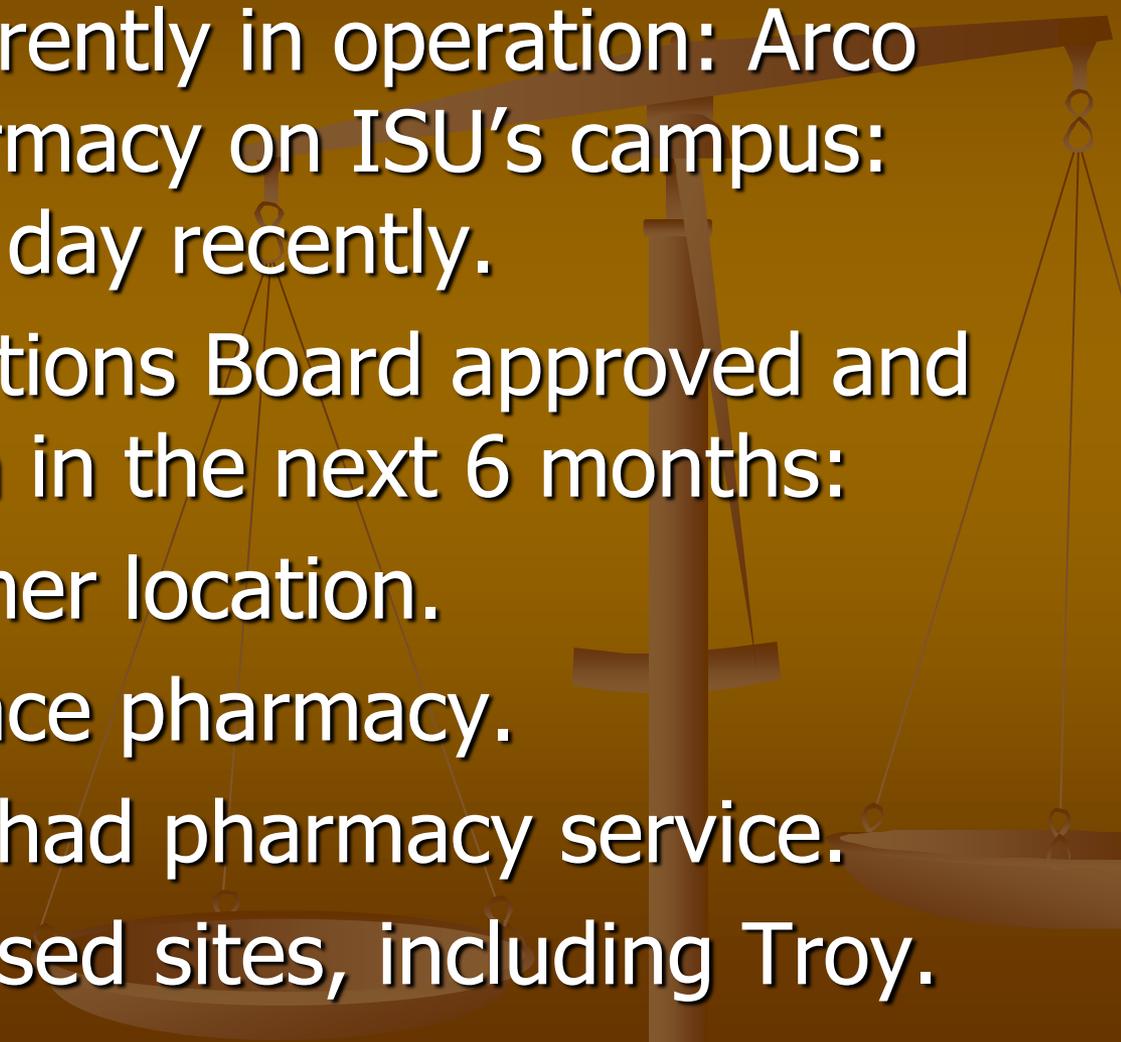
- Retail Telepharmacy with Remote Dispensing Sites
  - Staffed by nationally certified, experienced technicians.
  - Oversight by pharmacists in a supervising pharmacy through the use of video, audio, and common electronic communication systems.
  - Located rurally in a medical care facility

# Telepharmacy

- Patient counseling conducted via audio/visual system in a private, confidential area.
- Use of an automated storage and dispensing system (ADS) required.
- Additional security features when compared to a pharmacy.

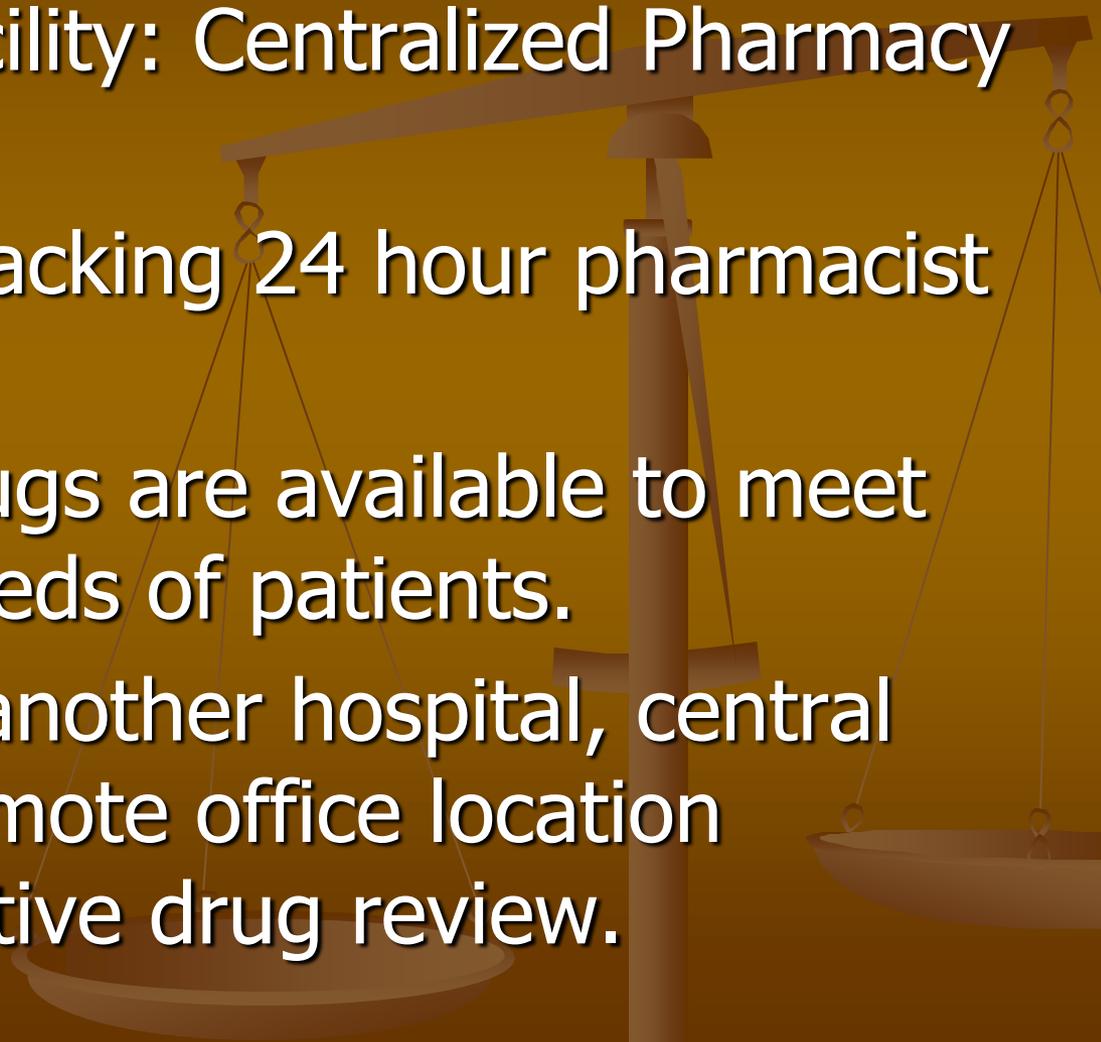


# TelePharmacy



- One location currently in operation: Arco from Bengal Pharmacy on ISU's campus: filled 199 Rx in a day recently.
- 4 additional locations Board approved and expected to open in the next 6 months:
  - Counsel: a former location.
  - Challis: to replace pharmacy.
  - Mackay: never had pharmacy service.
- Additional proposed sites, including Troy.

# Telepharmacy



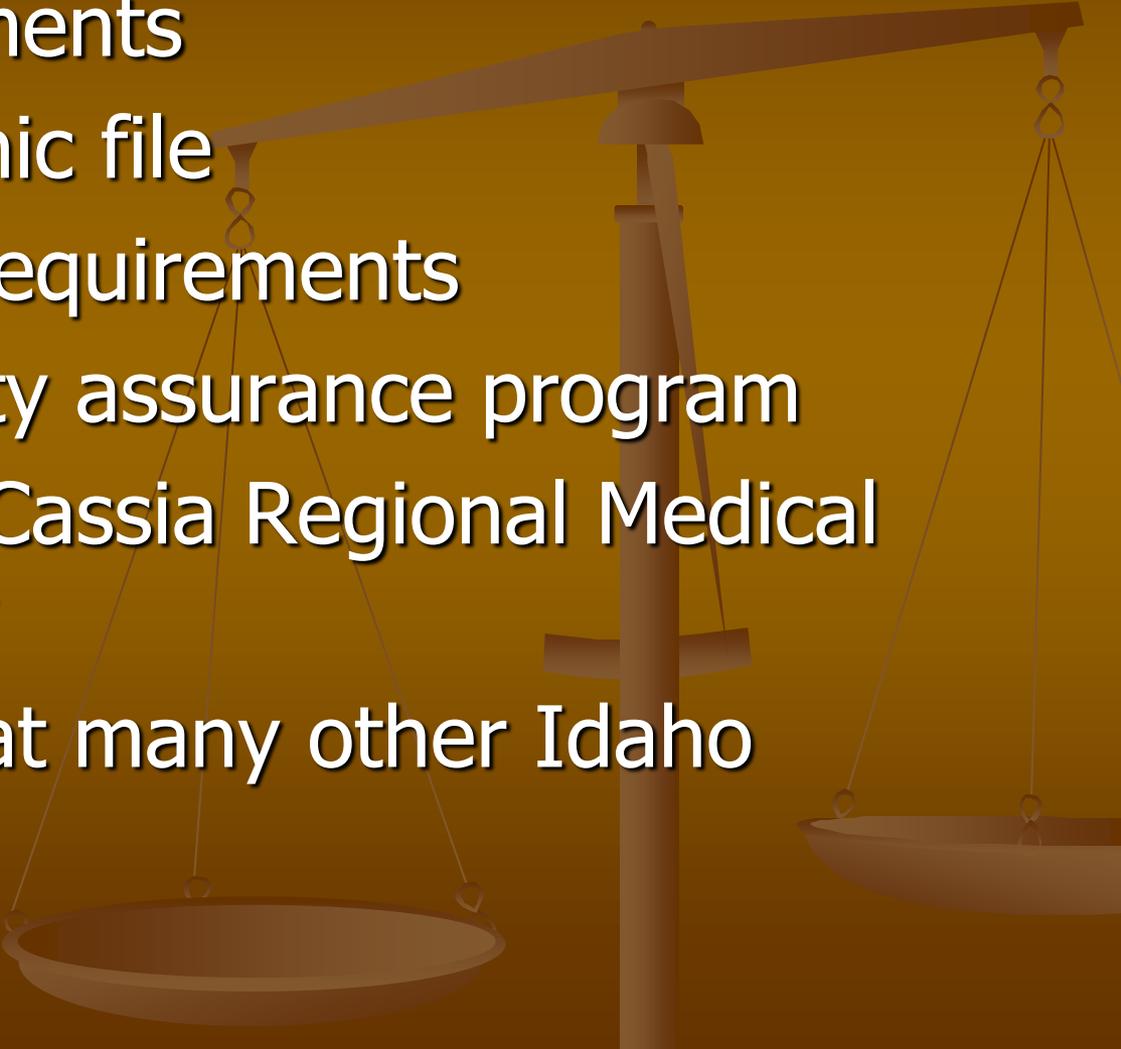
- Institutional Facility: Centralized Pharmacy Services

- For pharmacies lacking 24 hour pharmacist coverage.

- Ensuring that drugs are available to meet the immediate needs of patients.

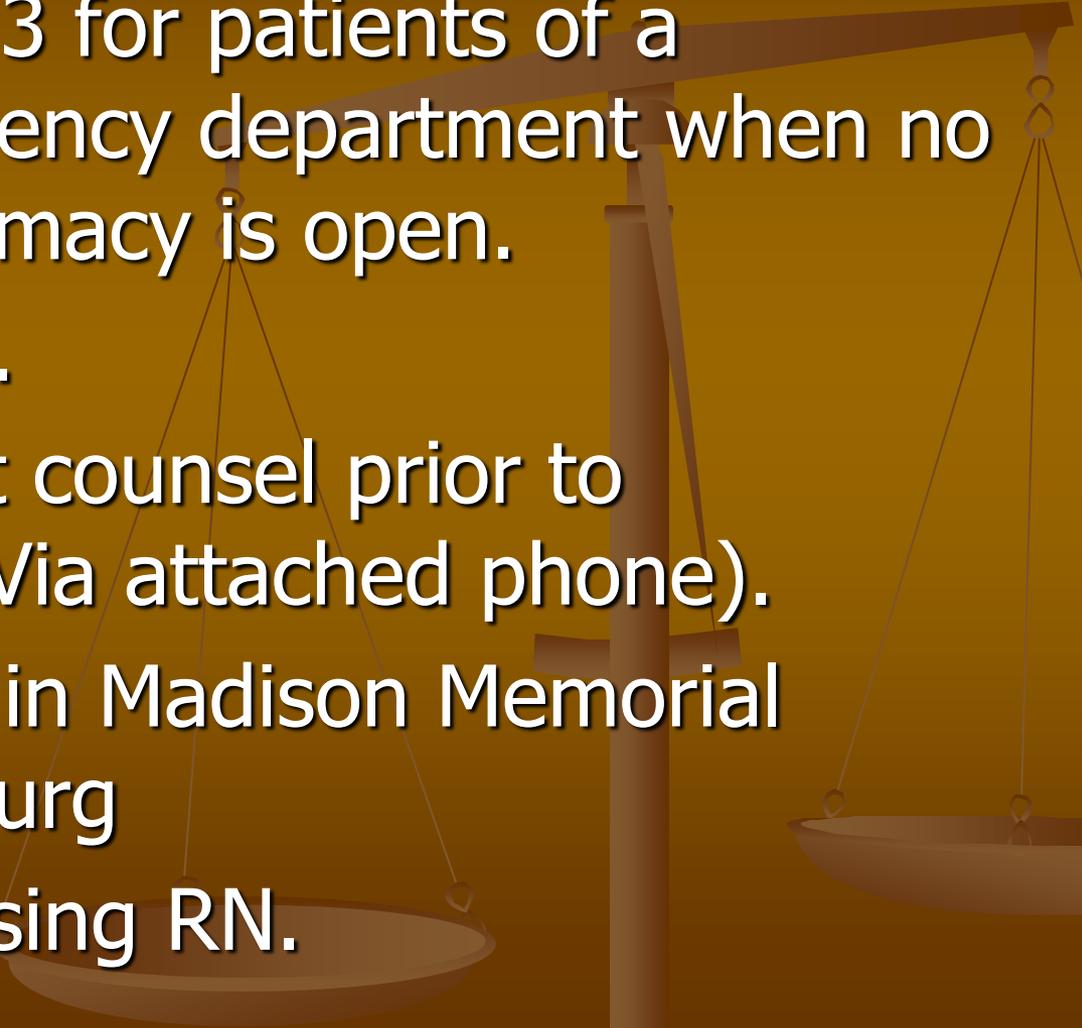
- A pharmacist in another hospital, central drug outlet, or remote office location performs prospective drug review.

# Telepharmacy



- Training requirements
- Common electronic file
- Communication requirements
- Continuous quality assurance program
  - Initial location: Cassia Regional Medical Center in Burley
- Currently in use at many other Idaho hospitals

# ADS: Self Service Systems

- Approved in 2013 for patients of a hospital's emergency department when no other retail pharmacy is open.
  - Limited quantity.
  - Pharmacist must counsel prior to dispensing (Ex. Via attached phone).
  - Currently in use in Madison Memorial Hospital in Rexburg
  - Replaces dispensing RN.
- 

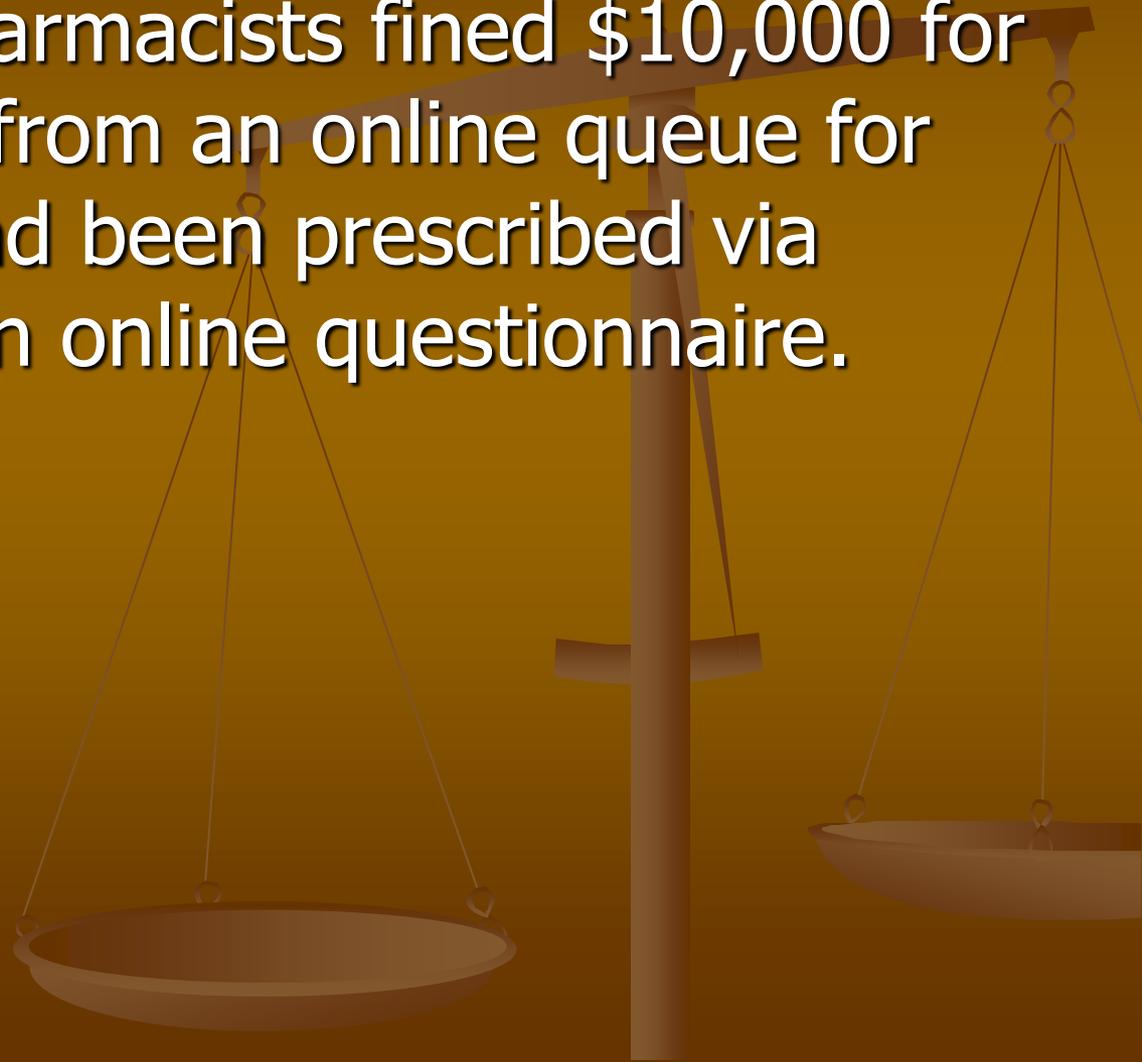
# Rogue Online Drug Outlets

- Citizen's Alliance 2011 report: 15% of college students admit to purchasing prescription drugs online, illegally.
- National Association of Boards of Pharmacy report: 11/6/14
  - 10,743 are illegal (96%)
  - Only 137 verified legitimate

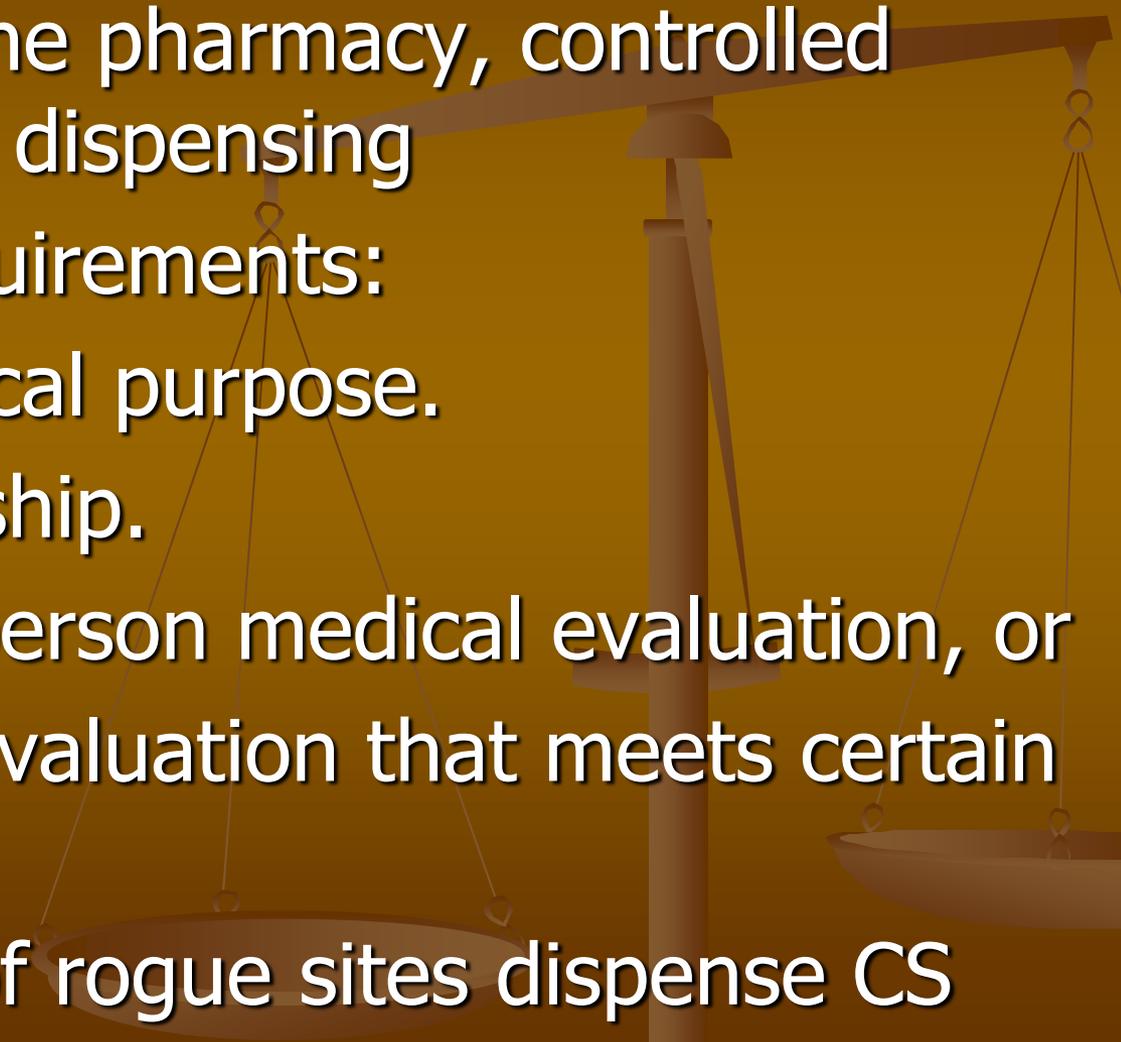


# Rogue Online Prescribing

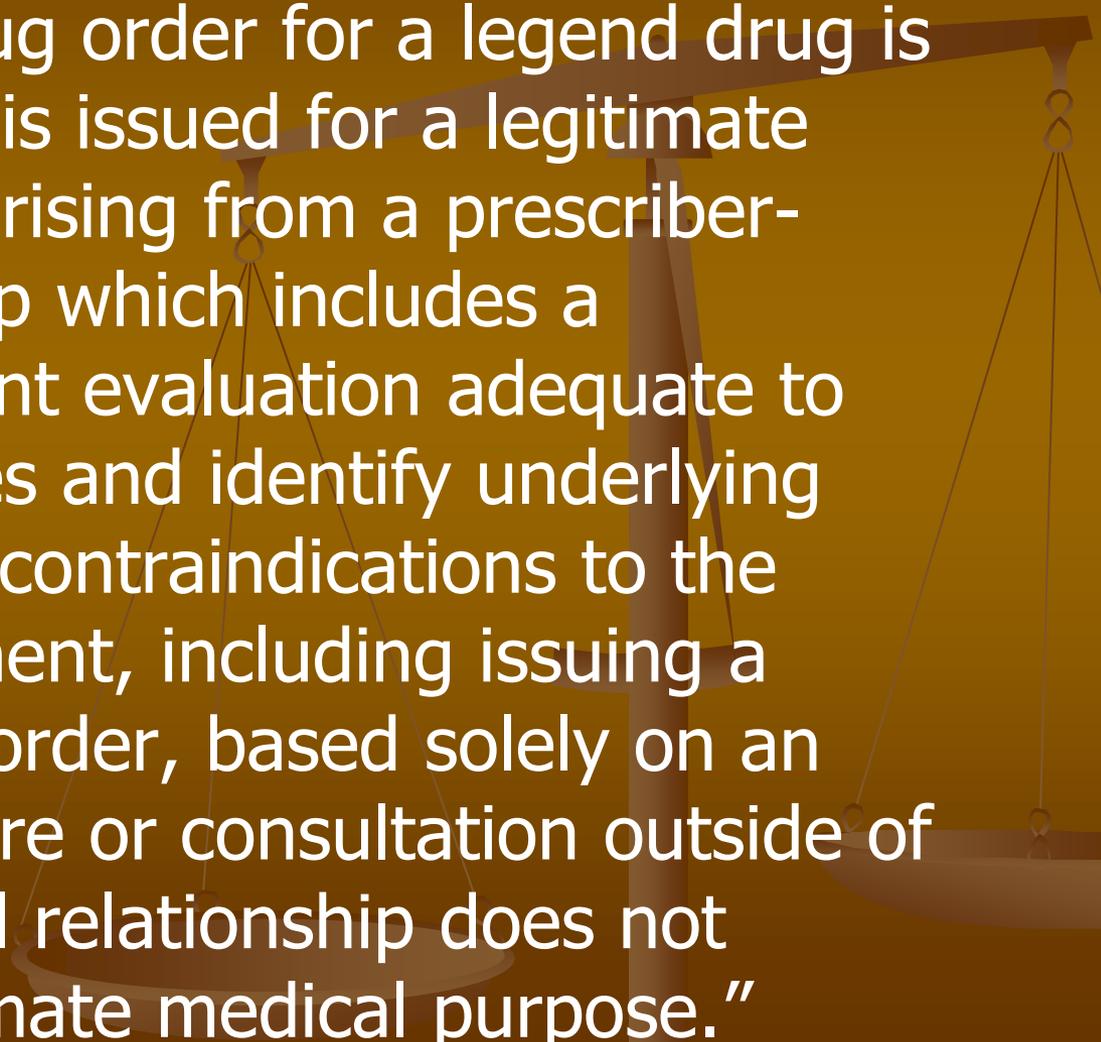
- 2007: Idaho pharmacists fined \$10,000 for dispensing Rxs from an online queue for patients who had been prescribed via completion of an online questionnaire.



# Ryan Haight Act of 2008

- Regulates on line pharmacy, controlled substance (CS) dispensing
  - Prescribing requirements:
    - Legitimate medical purpose.
    - Medical relationship.
    - At least one in-person medical evaluation, or
    - a telemedicine evaluation that meets certain criteria
  - Now only 8% of rogue sites dispense CS
- 

# Section 54-1733(1), Idaho Code

- “A prescription drug order for a legend drug is not valid unless it is issued for a legitimate medical purpose arising from a prescriber-patient relationship which includes a documented patient evaluation adequate to establish diagnoses and identify underlying conditions and/or contraindications to the treatment. Treatment, including issuing a prescription drug order, based solely on an online questionnaire or consultation outside of an ongoing clinical relationship does not constitute a legitimate medical purpose.”
- 

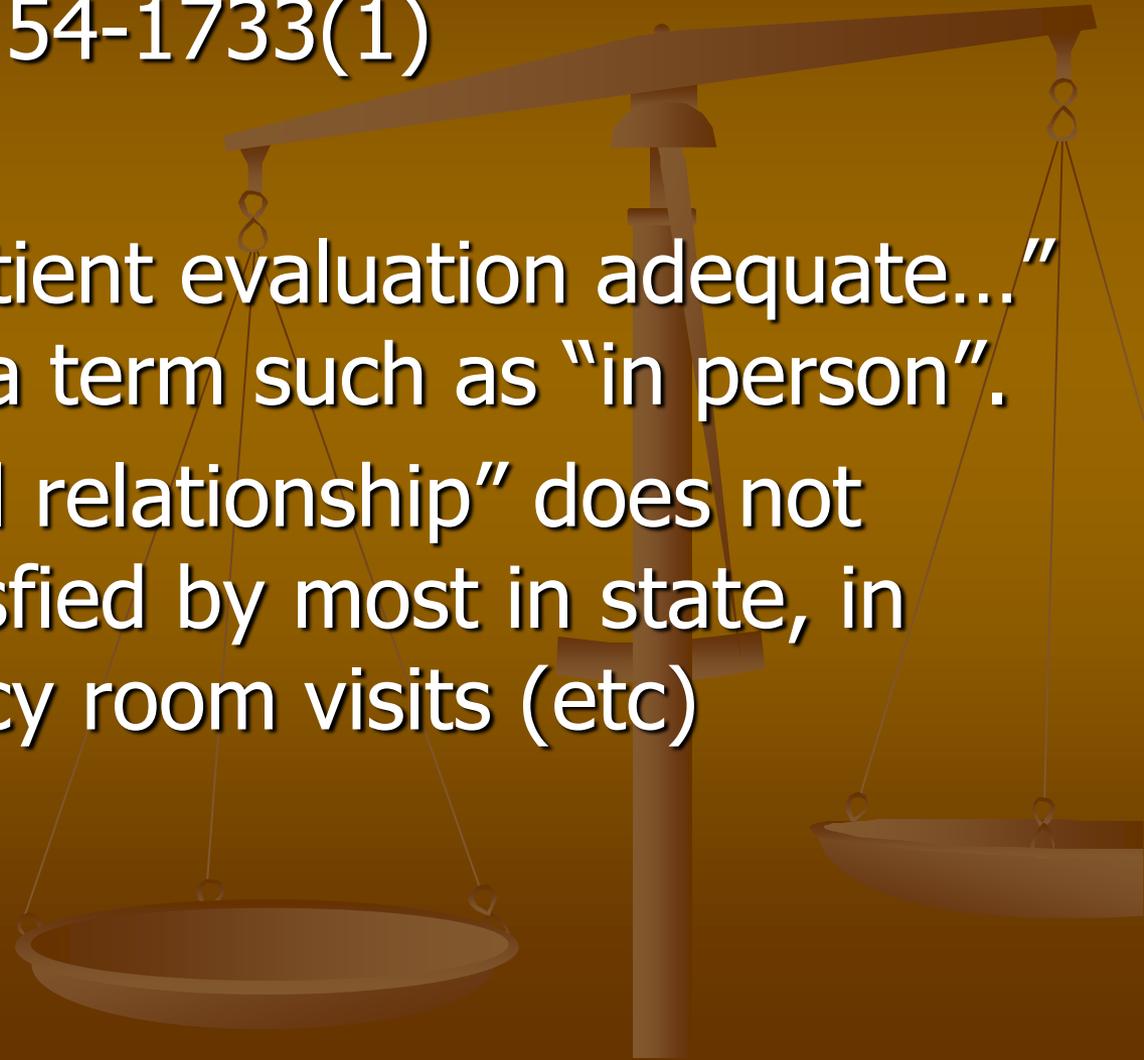
# Section 54-1733(1), Idaho Code

- 8 exceptions to 54-1733(1)

- Issues:

- “documented patient evaluation adequate...” does not include a term such as “in person”.

- “on-going clinical relationship” does not appear to be satisfied by most in state, in person, emergency room visits (etc)



# Section 37-2728(c), Idaho Code

- “practice related issues shall be referred by the Board to such registrant’s state licensing board”.
- Although contained within the Idaho Pharmacy Act, the Board of Pharmacy defers interpretation to the Board of Medicine for terms such as:
  - ongoing clinical relationship and
  - adequate evaluation

# Conclusion

- The Idaho Board of Pharmacy supports telemedicine approval in a step wise fashion.
  - Extreme caution is suggested if proposing to change 54-1733, as it has worked for a decade to curb illegal internet dispensing. Please avoid unintended consequences.
- 