



WEST VIRGINIA BOARD OF PHARMACY

newsletter to promote pharmacy and drug law compliance

USP Chapter <800> Hazardous Drug Update

The West Virginia Board of Pharmacy inspectors are now completing an inspection for United States Pharmacopeia (USP) Chapter <800> Hazardous Drugs—Handling in Healthcare Settings compliance with inspections. When the inspection is scheduled, the inspector will remind the pharmacist-in-charge to complete a self-inspection prior to arrival. All inspection forms have been placed conveniently on the Board’s website under “FAQs” and “**Inspection FAQs.**” Specifically, for USP Chapter <800> there are two possible inspection forms – one for compounding pharmacies and one for non-compounding pharmacies. Other forms located on the page include documents needed for inspection, all inspection forms, and compounding inspection forms (both sterile and nonsterile).

Rule Changes From the WVDEP to Impact Health Care Facilities and Reverse Distributors

There has been some confusion related to registration with the West Virginia Department of Environmental Protection (WVDEP). This registration is **not** related to compliance with USP Chapter <800> in any way. They are two separate subjects and requirements. On July 15, 2020, the Board was notified by the WVDEP that West Virginia adopted and incorporated by reference the requirements of 40 Code of Federal Regulations Part 266, Subpart P, also known as the “Pharmaceuticals Rule,” into the West Virginia Hazardous Waste Management Rule (33 Code of State Rules 20). The Pharmaceuticals Rule became effective July 1, 2020, in all parts of the state. The WVDEP has gone into pharmacies in West Virginia to verify WVDEP registration.

WVDEP has developed educational materials for pharmacies and health care facilities to assist in the proper management of pharmaceutical waste under these new requirements. The Pharmaceuticals Rule brings changes to the management of the following materials:

- potentially creditable hazardous waste pharmaceuticals in reverse distribution;
- non-creditable hazardous waste pharmaceuticals;
- nicotine reduction therapy and vaping product wastes;
- Drug Enforcement Administration controlled substances and household pharmaceuticals from drug take-back programs or events; and
- hazardous waste determinations for any over-the-counter pharmaceuticals, dietary supplements, and other retail items not eligible for reverse logistics.

To assist pharmacies and health care facilities with education and awareness of these new requirements, the WVDEP has developed a free online webinar. The webinar is available by selecting “Pharm Rule Guidance for HF’s and RDs” on WVDEP’s [web page](#).

There are two ways you can notify or change your notification status:

1. Complete Environmental Protection Agency (EPA) [Form 8700-12](#); sign, print, and send it by mail to:

WVDEP-EE-HW

Attn: Marjorie Skeens

601 57th St SE

Charleston, WV 25304

(Note: Box 2, Site EPA ID Number, on the form should be left blank if you have not previously notified and obtained an EPA ID number.)

2. Register online using myRCRAid ([one-page](#) instructions, approval takes about two to three hours), then log in to complete the form online. This method allows for easy information changes in the future using the login and password established during registration. A list of inspectors who may be contacted for assistance with the form or for questions can be found by scrolling down on the following link: <https://dep.wv.gov/WWE/ee/hw/Pages/hwcontacts.aspx>. Questions regarding pharmacy registration with the WVDEP should be directed to **Penny Harris, environmental inspector specialist** at Penny.L.Harris@wv.gov.

West Virginia Pharmacy Workload Study

The West Virginia Pharmacy Workload Task Force members have been selected and are currently meeting to formulate recommendations for the Board to address findings from the West Virginia Pharmacy Workload Study. The Board looks forward to bringing you those recommendations and additional details of the report. There were 1,848 individuals who completed all or part of the survey. The data are summarized below.

- 54.74% are pharmacists
- 36.35% are pharmacy technicians
- 9.03% preferred not to answer or answered “other”

Setting type:

- Independent – 10.43%
- Small chain (more than one but less than 12 locations) – 4.46%
- Large chain – grocery 25.65%
- Large chain – stand-alone 35.66%
- Inpatient hospital – 10.6%
- Outpatient hospital – 3.03%
- Compounding pharmacy – 0.67%
- Mail-order pharmacy – 1.09%
- Long-term care pharmacy – 1.68%
- Prefer not to answer – 2.52%
- Other – 4.21%

How many years have you been a pharmacist or pharmacy technician?

- <3 years – 11.72%
- 3-9 years – 28.16%
- 10-19 years – 27.99%
- 20-29 years – 20.74%
- >30 years – 11.38%

The following statements and levels of agreement are listed below.

	Strongly Disagree	Disagree	Neither Agree nor Disagree	Agree	Strongly Agree	Do Not Know or Does Not Apply
Staff in my primary worksite pharmacy have the skills they need to do their jobs well	5.93%	13.86%	14%	43.1%	22.34%	0.76%
My employer provides a work environment that allows for safe patient care	24.28%	22.07%	10.69%	23.03%	18.90%	1.03%
Patients are encouraged to talk to pharmacists about their medications	4.56%	8.8%	12.59%	37.53%	30.81%	5.71%
Pharmacists spend enough time talking to patients about how to use their medications	18.26%	25.12%	14.56%	22.34%	13.02%	6.7%
There is adequate time to complete my job in a safe and effective manner	39.01%	23.59%	10.41%	16.19%	10.02%	0.77%
It is safe to voice workload concerns to my employer	27.55%	22.69%	16.36%	19.37%	13.12%	0.93%
It is easy for staff to speak up to their supervisor/manager about patient safety concerns in my primary worksite pharmacy	18.55%	20.02%	15.46%	27.59%	16.92%	1.47%
There is adequate staff to handle the workload	45.31%	25.95%	8.29%	12.55%	7.28%	0.62%

Board Investigating Complaints of Workload Patient Safety Concerns

In addition to the work that the Workload Task Force is doing, the Board is investigating complaints related to pharmacy workload and patient safety concerns. As a reminder, any individual may make a complaint to the Board concerning a licensee or registrant, and the Board may accept an anonymous complaint if the information provided is adequate to begin an investigation. A complaint can be filed with the Board by going to its [website](#).

New Board Website Resources Available

The Board website continues to be updated, and additional resources are available on the website at *wvbop.com*. Specifically, the FAQs section has been expanded to include naloxone, immunizations, coronavirus disease 2019, controlled substances, inspections, hormonal contraception, and WVDEP pharmaceutical waste. This area of the Board website will be continually refreshed and added to as new information becomes available.

National Pharmacy Compliance News Now Available!

Visit NABP's website for the latest regulatory updates and news from FDA, USP, NABP, and more.

[Read National News](#)

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West Virginia Board of Pharmacy

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