



WYOMING STATE BOARD OF PHARMACY

newsletter to promote pharmacy and drug law compliance

PMP AWARxE Now Live

The new Bamboo Health PMP AWARxE Wyoming Prescription Drug Monitoring Program software system is now available. **Please note that the old website, <https://worxpdp.com>, is no longer available.** The new website's address is <https://wyoming.pmpaware.net/login>. Eligible new users can select "Create an Account" on the new website and follow the instructions provided. Here are some useful guides for the new PMP AWARxE system:

- [Quick Reference Guide – Making a Request](#)
- [PMP AWARxE User Guide](#)
- [Data Submission Dispenser Guide](#)

These guides are also available on the Wyoming State Board of Pharmacy's [website](#). The Board office is working to identify and notify dispensers that do not appear to be reporting into the new Bamboo Health PMP Clearinghouse.

Keep in mind that Wyoming Statute §35-7-1060 and the Board's Rules and Regulations require dispensers, other than veterinarians, to report any prescription for a Schedule II, III, IV, or V controlled substance (CS) dispensed no later than the close of business on the business day immediately.

National Pharmacy Compliance News

A Service of the National Association of Boards of Pharmacy Foundation (NABPF)

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

[Read National News](#)

Healthcare Distribution Alliance Pharmaceutical Cargo Security Coalition Fraud Alert

The Healthcare Distribution Alliance Pharmaceutical Cargo Security Coalition released a **fraud alert** that outlines some new methodologies that are being used to divert both small and large drug shipments. These schemes may involve the impersonation of regulatory personnel, including individuals from state boards of pharmacy and departments of health. They may also involve the impersonation of pharmacy or distributor staff. A pharmacy in Rock Springs, WY, reported being contacted by a scammer posing as their distributor, who said that they had shipped product to the pharmacy in error and requested that the shipment be returned. **More information** is available from the National Association of Boards of Pharmacy®. If you experience an attempt at this type of scam, please email cforaith@hda.org so that it can be shared with law enforcement.

Clarification on the Required Elements for CS Prescriptions

The Board has received inquiries about the elements that constitute a valid CS prescription and a pharmacist's ability to make certain changes to CS prescriptions in consultation with the prescriber. The source of the confusion appears to be as follows:

- A 2019 presidential executive order required all federal agencies to review and consolidate various informal guidance documents.
- As a result of this review, Drug Enforcement Administration (DEA) removed informal guidance on its website that concerned changes to Schedule II prescriptions.
- The National Association of Chain Drug Stores (NACDS) issued a letter describing a private phone call with unnamed DEA officials.
- NACDS interpreted statements from the unnamed DEA officials on this call as an "implication" that Schedule II prescriptions may not be altered or changed in any way by a pharmacist, and that if any of the elements of a prescription required by **21 Code of Federal Regulations 1306.05(a)** are missing or in need of alteration (such as the address of the patient), then the pharmacist cannot add or change any of the elements, and the prescriber must instead issue a new prescription.

It is important to note that while the previous DEA guidance regarding changes to Schedule II prescriptions is not currently listed, even the most up-to-date listed guidance documents on **DEA's Guidance Document Portal** do not have the force and effect of law and are not binding on the public in any way.

DEA Policy on Schedule II CS Prescriptions

In the past few months, DEA has received an increasing number of questions concerning pharmacists' ability to add or modify information – like a patient's address – on paper prescriptions. To handle

these questions, DEA has been reviewing the relevant regulations and working to draft new regulations. As an interim measure, pharmacists are permitted to adhere to state regulations or policies regarding those changes that a pharmacist may make to a Schedule II prescription after oral consultation with the prescriber.

Further communication will be forthcoming from DEA.

Wyoming's Requirements for CS Prescriptions

The [Wyoming Controlled Substances Act Rules Chapter 10](#) provides Wyoming's requirements for CS prescriptions. The chapter also provides information on what elements of a CS prescription may be changed or added after consulting with or obtaining approval from the prescribing practitioner. In order to limit and prevent disruptions to care, the Board encourages practitioners to ensure that the required elements for a CS prescription are present when issuing the prescription. The Board also encourages pharmacists to use their professional judgment when verifying the information on the prescription and to not reject a prescription as invalid when the information on the prescription is correct but conflicts with the information in the patient's profile at the pharmacy. For example, state and federal requirements include the patient's address. Neither specifies that this must be a physical address or prohibits a patient's mailing address from appearing on the prescription.

FDA Authorizes Pharmacists to Prescribe Paxlovid, With Certain Limitations

Food and Drug Administration (FDA) revised its coronavirus disease 2019 [emergency use authorization](#) to allow state-licensed pharmacists to prescribe Paxlovid™ to eligible patients, subject to specific limitations. Pharmacists must be competent to perform the services provided and must ensure that patient care services are safely performed in accordance with applicable standards of care. Pharmacists prescribing pursuant to FDA's authorization must comply with all FDA prescribing and documentation requirements. For more information, please view [FDA's press release](#).

Recent Pharmacy Burglaries in Wyoming

During the previous quarter, a pharmacy in Casper, WY, reported that it had been broken into and suffered the loss of a significant amount of Schedule II prescription medication. Burglary attempts were also made at pharmacies in Powell, WY, and Wheatland, WY. You may wish to review your security procedures and provide staff education on prevention attempts, what to do during a robbery, and what needs to be done after a burglary. The Board's [March 2018 Newsletter](#) and DEA's Pharmacy Robbery & Burglary [brochure](#) and [presentation](#) may be useful resources to review. Federal regulations require that registrants notify their local Field Division Office, in writing, of the theft or significant loss of any CS within one business day of discovery of such loss or theft. DEA's [website](#) provides information to locate your local office as well as a downloadable Form 106.

Reminder: Board Going Paperless for Renewals Beginning in 2023

To make the renewal process more efficient, 2022 will be the last year that the Board will mail out paper renewal notices. The Board will send out **email** notices and instructions when the renewal period opens to renew your license. Please make sure that your email contact information is up to date. You can check this by visiting the Board's website and clicking on the "Renew/Print License" link along the top of the screen.

If you have forgotten your username or password, please click "[Recover Login Credentials.](#)" If you do not believe you currently have an online login credential, please use the "Create Account" link. Please note that the username and password for your renewal is not necessarily the same username and password that you may have used for your WORx user account.

Renewal forms will continue to be available to download from the Board's [website](#) if you would like to submit your renewal on paper. You may also contact the Board office by phone at 307/634-9636 or by email at bop@wyo.gov if you have questions.

Recent Disciplinary Actions

M.T., RPh, #3017: Failed to complete 1.5 hours of continuing education (CE) on the responsible prescribing of CS as required by the Wyoming Pharmacy Act. Required to complete 12 extra hours of CE, including three hours on pharmacy law, and to pay an administrative penalty of \$500.

J.H., RPh, #1897: Failed to complete 1.5 hours of CE on the responsible prescribing of CS as required by the Wyoming Pharmacy Act. Required to complete 12 extra hours of CE, including three hours on pharmacy law, and to pay an administrative penalty of \$500.

B.T., RPh, #3129: Failed to exercise corresponding responsibility by allowing a patient to routinely fill and refill a CS prescription early on multiple occasions. Administrative penalty stayed if he completes a certificate program containing a minimum of 20 hours of CE relating to the topics of medication safety or opioid therapeutics.

The Wyoming State Board of Pharmacy News is published by the Wyoming State Board of Pharmacy and the National Association of Boards of Pharmacy Foundation® (NABPF®) to promote compliance of pharmacy and drug law. The opinions and views expressed in this publication do not necessarily reflect the official views, opinions, or policies of NABPF or the Board unless expressly so stated.

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