FEBRUARY 2025

OHIO BOARD OF PHARMACY

Newsletter to Promote Pharmacy and Drug Law Compliance.

From the Director's Desk

Dear Ohio Pharmacists,

On December 16, 2024, the Ohio Automated Rx Reporting System (OARRS) began alerting health care providers about patients who have experienced a nonfatal drug overdose. The "Non-Fatal Drug Overdose Indicator" is intended to improve care coordination and promote access to medication for opioid use disorder (MOUD), in addition to other tools to prevent fatal overdoses.

For more information about the indicator, please see the following quick reference guide: *www.pharmacy.ohio.gov/NFOD.*

Important Reminders:

- A history of a nonfatal drug overdose is **not** reflected in the Overdose Risk Score listed on a patient's OARRS report.
- The indicator does not provide information on overdoses treated by emergency medical services where the patient refused transport to a hospital or overdoses that were treated in Ohio hospitals prior to April 8, 2024.
- The indicator is visible to prescribers and pharmacists only.
- This information is intended to be used to improve care coordination and **should not** be used to terminate a patient relationship.

To assist pharmacists in using this information, the Ohio Board of Pharmacy developed a frequently asked questions (FAQs) document, which can be accessed here.

To assist prescribers in using this information, Ohio's health care regulatory boards developed an FAQs document, which can be accessed here.

Among Ohioans who died in 2022 from an unintentional drug overdose, at least 32% experienced a prior nonfatal overdose. Additionally, 26% of those who suffered a fatal overdose in 2022 received

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From the Director's Desk *(cont)*

a prescription for a controlled substance (CS) from a health care provider within 60 days of their death. These interactions with the health care system reinforce the need to ensure that high-risk patients have access to interventions such as overdose reversal medications (eg, naloxone) and MOUD.

This new alert system is another example of Governor Mike DeWine's ongoing and comprehensive efforts to prevent overdose deaths and fight drug addiction. Ohio's coordinated efforts are achieving results.

In October, Governor DeWine announced that newly verified data by the Ohio Department of Health demonstrated that the number of overdose deaths in Ohio has dropped substantially for a second consecutive calendar year.

Thank you for all you do to keep Ohioans safe and healthy.

Sincerely,

Steven W. Schierholt, Esq
Executive Director
Ohio Board of Pharmacy

Mobile Clinic and Medication Unit Satellite License Form Launches

Effective January 15, 2025, Ohio Administrative Code (OAC) 4729:5-3-23 authorizes the following terminal distributors of dangerous drugs (TDDDs) to operate a mobile clinic or medication unit:

1) A nonprofit organization, corporation, or association as defined in the Ohio Revised Code; or

2) A for-profit entity for the purpose of providing services to an individual needing treatment for a substance use disorder, a mental health condition, and any related medical issue.

To operate a mobile clinic or medication unit, a licensed TDDD is required to register for a no-cost satellite license affiliated with the licensee by using the form that can be found at *www.pharmacy.ohio.gov/mobile.*

Occasional Sales or Transfers of CS and Gabapentin Must Be Reported to OARRS

Any licensee engaged in the transfer, including intracompany transfers, or sale of CS or gabapentin must report those transactions to OARRS. Any transfer of a CS or gabapentin between two different TDDD license numbers, or Drug Enforcement Administration (DEA) registrations, must be reported as a wholesale transaction, even for just one tablet. Wholesale quantities are reported by the number of packages, not

Occasional Sales or Transfers of CS and Gabapentin Must Be Reported to OARRS *(cont)*

the number of tablets. Fractional quantities are allowed. For example, if you sell one bottle of 100 tablets of drug X, you would report "1" as the quantity. If you sell 50 tablets of the bottle of 100, report a quantity of "0.5."

Reminder: Transfers or sales between wholesalers are not required to be reported to OARRS.

2025 Law and Responsible Person Review, Virtual Presentations

Join the Board for presentations throughout 2025 to learn about the latest developments in pharmacy laws and rules.

2025 Law Review Topics:	Responsible Person Roundtable Topics:	Responsible Person 101 Topics:
• Duty to report and continuous quality improvement • Minimum standards for outpatient pharmacies • Updates to state and federal laws and rules • Hot topics and drug diversion trends	• How should a responsible person (RP) handle the duty to report and establish a continuous quality improvement program? • Updates to state and federal laws and rules • Hot topics and drug diversion trends	• Duties and responsibilities of an RP • General requirements of a TDDD • An overview of resources available for an RP

For presentation dates and times, as well as a link to sign up, visit *https://www.pharmacy.ohio.gov/LawReview.*

Reminder: Continuous Quality Improvement Rules, Effective March 1, 2025

On March 1, 2025, the following rules will go into effect:

- Rule 4729:5-3-22 of the OAC requires any pharmacy licensed as a TDDD to implement a continuous quality improvement program for pharmacy services. For more information on the requirements of this rule, visit *www.pharmacy.ohio.gov/PharmacyCQI.*
- Rule 4729:5-4-02 of the OAC requires pharmacies licensed as TDDDs to submit certain information to the Board. This includes the reporting of some dispensing errors. For more information on the requirements of this rule, visit *www.pharmacy.ohio.gov/PharmacyReport.*

Reminder: Continuous Quality Improvement Rules, Effective March 1, 2025

(cont)

To coincide with the new rules listed above, the Board is also implementing new duty to report rules for pharmacy personnel, effective March 1, 2025:

- Rule 4729:1-4-02 of the OAC is a new version of the pharmacist duty to report rule. This rule removes the requirement that pharmacists report errors in dispensing to the Board, as this responsibility will fall under the pharmacy duty to report rule (OAC 4729:5-4-02). For more information on the new version of this rule, visit *www.pharmacy.ohio.gov/PharmReportNew.*
- Rule 4729:2-4-02 of the OAC is a new version of the pharmacy intern duty to report rule. For more information on the new version of this rule, visit *www.pharmacy.ohio.gov/InternReportNew.*
- Rule 4729:3-4-02 of the OAC is a new version of the current pharmacy technician duty to report rule. For more information on the new version of this rule, visit *www.pharmacy.ohio.gov/TechReportNew.*

DEA Warns Health Care Workers of Impersonation Scam Targeting Doctors and Pharmacists

DEA's New Orleans Division is issuing a critical alert to health care professionals, warning of recent scam calls targeting doctors and pharmacists. Fraudsters are impersonating DEA agents to steal sensitive information and possibly extort money.

Please know that DEA personnel will never contact medical practitioners or members of the public by telephone to request personal or sensitive information or demand money or any other form of payment. Legitimate DEA agents will only notify individuals of investigations or legal actions in person or via an official letter.

Reported scam tactics continually change but often share many of the same characteristics. After finding them online, callers use the names of well-known DEA officials, retired or former special agents, and/or police officers in local departments. Callers will also provide fake badge numbers.

For more information, including a phone call recording of someone attempting to impersonate a DEA special agent, visit *www.pharmacy.ohio.gov/DEAScamWarning.*

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