

OHIO BOARD OF PHARMACY

*Newsletter to Promote Pharmacy
and Drug Law Compliance.*

From the Director's Desk

Dear Ohio Pharmacists,

Ohio's prescription issuance rule ([Ohio Administrative Code \[OAC\] 4729:5-5-15](#)) requires doctors of medicine/osteopathic medicine, advance practice registered nurses, and physician assistants to include the ICD-10-CM medical diagnosis code of the primary disease or condition that the controlled substance (CS) is being used to treat. The code shall, at a minimum, include the first four alphanumeric characters of the ICD-10-CM medical diagnosis code, sometimes referred to as the category and the etiology.

IMPORTANT: This requirement and guidance does not apply to the following:

- Veterinarians are exempt from any diagnosis code requirement

on a CS prescription, per OAC 4729:5-5-15(B)(14)(b).

- Dentists are required to include the Code on Dental Procedures and Nomenclature, as published by the American Dental Association, of the dental treatment requiring the CS prescription.

For more information, the Board developed a guidance document that can be accessed at www.pharmacy.ohio.gov/DxCode.

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

Sincerely,

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

*Access the National
Pharmacy Compliance News*

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



OARRS Provider Authorization Updates

On June 9, 2026, the Ohio Board of Pharmacy activated a Prescription Monitoring Program Gateway feature

called Provider Authorization, which may impact your Ohio Automated Rx Reporting System (OARRS) access.

OARRS Provider Authorization Updates

(cont)

Provider Authorization will automatically validate your credentials in real time. You may be **unable to access OARRS** through your electronic medical records or pharmacy software unless you have:

- an active OARRS account; **and**
- an accurate and current:
 - state license number;

- Drug Enforcement Administration (DEA) number (if applicable per role); and
- National Provider Identifier number (if applicable per role).

Licensees who may be affected have been contacted via email. For further details, visit www.pharmacy.ohio.gov/providerauth.

Reminder: Electronic Positive Identification Requirements Effective March 31, 2027

Starting on March 31, 2027, amendments to OAC 4729:5-5-04 will require, with limited exceptions, that all Ohio outpatient pharmacies adopt electronic positive identification as part of the pharmacy's record-keeping system. This means that once effective, the rule will not permit the use of hard copy records and manual signatures to capture positive identification, except for the following:

- compounding and the dispensation of compounded drugs;
- ancillary services as defined in OAC 4729:5-5-02.1; and

- records maintained in accordance with OAC 4729:5-3-17.

IMPORTANT: This change does not impact institutional pharmacies (except those that operate outpatient pharmacies), nonresident pharmacies, and other terminal distributors (emergency medical services, clinics, opioid treatment programs, etc). To review the upcoming amendments to the rule, visit www.pharmacy.ohio.gov/positiveIDchange.

Waiver Request Process

A waiver of the requirement for electronic positive identification may be granted by the Board upon written request of an outpatient pharmacy. All requests must be submitted in writing using this [form](#).

NOTE: The Board reserves the right to request additional information and documentation to render a decision as to whether to grant a waiver. Waivers will be granted on a limited basis, and requests that do not include all the required information will not be reviewed by Board staff.

Reminder to Compounding Pharmacies: Board Adopts New USP <797> and USP <795> Standards – Enforcement Begins on February 28, 2027

On February 28, 2026, revisions to [OAC 4729:7-1-01](#) went into effect. These revisions require compliance with the newest versions of United States Pharmacopeia (USP) <797> and USP <795> (both adopted by USP on March 1, 2023). While the rule became effective on February 28, 2026, the Board has extended the enforcement date of the rule until **February 28, 2027**.

To assist both Ohio and nonresident pharmacies in complying with these new standards, the Board updated its compounding guidance documents:

- *Pharmacy Compounding in Ohio* (www.pharmacy.ohio.gov/pharmcompound)
- *Non-Resident Pharmacy Compounding in Ohio* (www.pharmacy.ohio.gov/NRPcompound)

Reminder to Compounding Pharmacies: Board Adopts New USP <797> and USP <795> Standards – Enforcement Begins on February 28, 2027

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For questions regarding pharmacy compounding standards, please review these documents. If you need additional information, the most expedient way to have

your questions answered is to email the Board office by visiting www.pharmacy.ohio.gov/contact.

Reminder: Licensure Requirements for Investigational New Drug Products

The Board would like to remind licensees that effective February 4, 2026, Ohio licensure as a terminal distributor of dangerous drugs from the Board **is required** for all entities engaged in phase 2 or 3 clinical trials of an investigational new drug or product.

For more information on these licensure requirements, the Board developed this [guidance document](#).

Governor Signs SB 137 Into Law

Governor Mike DeWine recently signed Senate Bill (SB) 137 into law. This law generally requires a hospital to provide an overdose reversal drug to a patient at the time of the patient's discharge if the patient is presented to the hospital's emergency department with symptoms of opioid use disorder or overdose. The Board does not plan on adopting any rules on this new law change.

To learn more about SB 137, visit www.pharmacy.ohio.gov/SB137.

Board Updates Time Frame for Reporting Theft or Significant Loss

To coincide with updated DEA regulations for theft or significant loss reporting, the Board has extended the time frame to submit a final theft or significant loss report from 30 days to 45 days. For more details, visit www.pharmacy.ohio.gov/Theft.

CRNA DEA Registration Guidance

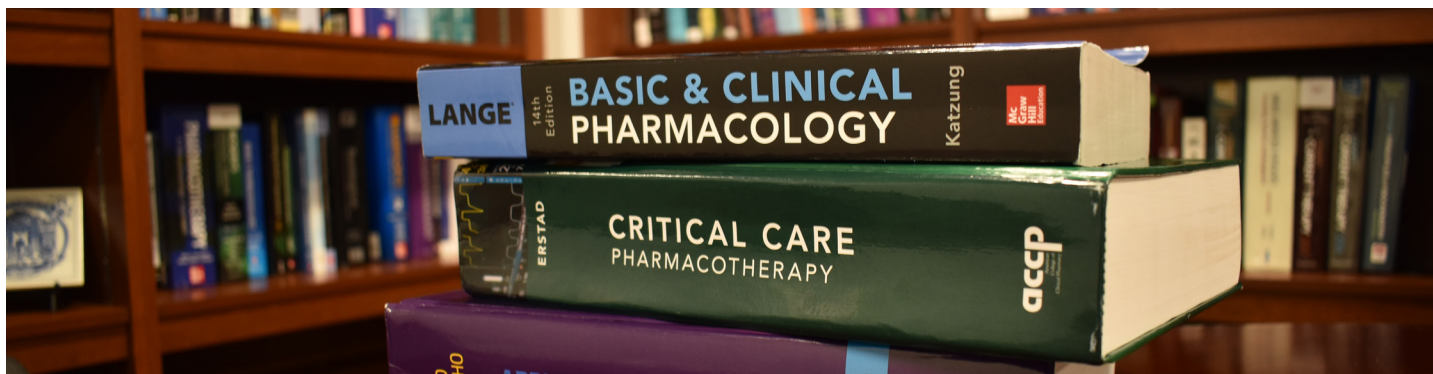
Effective June 9, 2026, [House Bill 52](#) (136th General Assembly) eliminated the current requirement that a certified registered nurse anesthetist (CRNA) practice **under the supervision** of a physician, podiatrist, or dentist. Instead, it will require a CRNA to **practice in collaboration** with such a provider.

NOTE: A CRNA is still not permitted to prescribe a drug for use outside of the health care facility (eg, outpatient prescription) where they practice.

To assist CRNAs in complying with state and federal laws regarding the requirement to hold a DEA registration, the Board updated its [guidance](#).

For any additional questions regarding CRNA scope of practice, please contact the Ohio Board of Nursing: <https://nursing.ohio.gov/help-center>.

For information about registering with DEA, visit <https://www.deadiversion.usdoj.gov/drugreg/registration.html>.



Waiver of Third-Party Prescription Intermediary Approval

The Board is no longer approving third-party intermediaries. For further details on complying with OAC 4729:5-3-11, visit www.pharmacy.ohio.gov/3rdParty.

Application of OAC 4729:5-5-05 to FDA-Approved Sodium Oxybate Products Under Approved REMS

To accommodate titration requirements, the Board has waived the prohibitions in OAC 4729:5-5-05(B)(2) and (B)(4) for Food and Drug Administration (FDA)-approved sodium oxybate products that

are subject to an approved Risk Evaluation and Mitigation Strategy (REMS). As a condition of this exception, all pre-printed forms shall be designed to require the inclusion of a diagnosis code in accordance

with OAC 4729:5-5-15(B)(14). This exception does not apply to any non-FDA-approved products, including any dangerous drugs that are compounded.

Secure Methods of Documenting Positive Identification in a Pharmacy Guidance Document

The Board recently created a guidance document providing information for Ohio outpatient and institutional pharmacies on how to meet its positive identification requirements. Information in the document may be applied to other terminal distributor license types that must also document certain records by using positive identification.

To access the document, visit www.pharmacy.ohio.gov/positiveIDmethods.

Funding Ends for Board Distribution of Fentanyl and Xylazine Test Strips

The Board regrets to inform licensees that funding for fentanyl and xylazine test strip distribution through the Ohio Board of Pharmacy has expired, and the Board has ceased the distribution of test strips.

Licensees are still able to request naloxone overdose and recognition brochures while supplies last. Use the following link to order: www.pharmacy.ohio.gov/nalbrochure.

DSCSA Foundational Blueprint for 2023 Interoperability

The Board would like to remind pharmacies about the Drug Supply Chain Security Act (DSCSA) *Foundational Blueprint for 2023 Interoperability* resource. This blueprint provides a crucial framework for implementing DSCSA 2023 interoperability requirements and establishing business and compliance requirements believed to be necessary for efficient interoperability in line with the intentions of DSCSA.

You can visit the blueprint at <https://dscsagovernance.org/blueprint/>.

Resource From NABP: ‘Inside the Fight Against Falsified Medications: How Traceability Protects Patients’

The National Association of Boards of Pharmacy®’s (NABP®’s) latest blog post shared strategies for protecting consumers from counterfeit medications.

Keeping the prescription drug supply chain secure is essential for ensuring patient safety.

However, the immense scale and complexity of the global supply chain have made it a persistent target for criminal organizations. The fight against falsified medications demands constant innovation and adaptation. As counterfeit methods evolve,

so must the strategies used to detect and prevent them, requiring increasing collaboration across the supply chain to protect patients.

To read more, visit [NABP’s website](#).

Substance Abuse and Mental Health Resources for Health Care Professionals

The health care profession is not immune to substance use disorders (SUDs) and mental health conditions. Such medical conditions impair a health care professional’s competency, ability, and judgment. SUDs and/or mental health conditions that are left untreated may not only cause a health care professional to risk their career but may also endanger the life of a patient.

These medical conditions can be effectively treated, and it is possible for health care professionals who are in treatment or recovery to return to practice.

The Board encourages all health care professionals who may be struggling with an SUD or mental health condition to seek help. Our rules encourage you to seek help if you need it, with no fear of reprisal

or repercussions. Specifically, the Board’s duty to report rules does not require reporting to the Board if a licensee voluntarily seeks treatment for a mental health condition or SUD.

For more information about the available substance abuse and mental health resources for health care professionals, visit www.pharmacy.ohio.gov/Recovery.

Licensee Scam Warning

The Board continues to learn that licensees are being targeted by scammers who claim to work for various governmental agencies (Board of Pharmacy, DEA, Federal Bureau of Investigation, Department of Justice, etc) in attempts to extort money. The Board strongly encourages licensees to be on alert to avoid scammers.

Scammers may try to initiate contact via phone calls, emails, faxes, and letters purporting to originate from various state and federal agencies that include allegations of drug trafficking and threats of suspension against the target's license.

Board investigators will not ask for fine payment or personal/sensitive information over the phone and will never contact licensees via fax. As a reminder, administrative fines issued by the Board are not paid via gift cards or cryptocurrency. If the Board is investigating, and an individual faces action against their license, they will receive an official notice of opportunity for a hearing either via certified mail or by personal service.

If you are contacted by a scammer, please report this information using the Board's online [complaint form](#). Additionally, reports should be made to your local law enforcement agency.

If you receive any suspicious calls or correspondence purporting to be from the Board, you are encouraged to call (614/466-4143) or email (contact@pharmacy.ohio.gov) the Board to confirm its legitimacy.

As licensees become more vigilant about looking out for scams, the Board would like to remind all licensees that official electronic registered mail from the Board of Pharmacy will sometimes have a **Registered Email | Certified Delivery** banner across the top, like in the image below. Emails with this banner are official correspondence from the Ohio Board of Pharmacy.



REGISTERED EMAIL™ | CERTIFIED DELIVERY

This is a Registered Email™ message from Jennifer.Nelson@pharmacy.ohio.gov.

Good Afternoon,

The State of Ohio Board of Pharmacy (Board) is contacting you regarding your scheduled June 3, 2024, probation appearance. The June Board Meeting will be held at the offices of the **State Board of Pharmacy, 77 South High Street, Columbus, Ohio 43215-6126**; however, you will have the option of participating in your Probation Appearance in-person or remotely.

The Ohio Board of Pharmacy News is published by the Ohio 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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