NOVEMBER 2026

OHIO BOARD OF PHARMACY

Newsletter to Promote Pharmacy and Drug Law Compliance.

From the Director's Desk

Dear Ohio Pharmacists,

Effective **March 31, 2027,*** amendments to Ohio Administrative Code (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.

*On September 14, 2026, the Ohio Board of Pharmacy adopted the following resolution, **delaying the enforcement of the rule until November 1, 2027:**

The Ohio Board of Pharmacy hereby delays the enforcement of OAC 4729:5-5-04 (effective March 31, 2027) until November 1, 2027. During this delay, any licensee found in violation of OAC 4729:5-5-04 will be issued a written warning for failing to comply with the requirements of the rule. Any outpatient pharmacy that does not comply with the requirements of OAC 4729:5-5-04 on or after November 1, 2027, will be subject to administrative discipline in accordance with OAC 4729:5-4-01.

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*.

Access the National Pharmacy Compliance News

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From the Director's Desk

(cont)

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.

IMPORTANT REMINDERS:

- 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.
- Pharmacies that cannot meet the narrow qualifications for a waiver will be considered in violation of OAC 4729:5-5-04 if electronic positive identification is not adopted by November 1, 2027.

Waivers requesting extensions to this requirement will not be granted at this time. Waivers are intended to alleviate economic hardship and/or to address pharmacies engaged in low-volume dispensing. They are not intended to address delays in planning by licensees. (**NOTE:** These requirements were initially announced in June 2025, thereby giving licensees more than 21 months to ensure compliance.)

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

Sincerely,

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

Board Adopts FDA Temporary Policies for Neonatal Parenteral Nutrition

On September 14, 2026, the Board adopted Food and Drug Administration's (FDA's) *Temporary Policies for Compounding Certain Starter Parenteral Nutrition Drug Products for Neonates* guidance (effective September 2026). The enforcement policies in this guidance are intended to provide temporary flexibility for licensees until March 8, 2027, to help ensure that these products remain available to hospitals and health systems while alternative sources increase supplies.

Ohio Law Permits Dispensing of an Emergency Refill of Medication Without a Prescription

Ohio Revised Code (ORC) 4729.281 authorizes a pharmacist to dispense emergency refills without a prescription. A pharmacist is permitted to dispense medication, other than a Schedule II controlled substance (CS), without a written or oral prescription if all the following conditions are met:

1. The pharmacy at which the pharmacist works has a record of a prescription for the drug in the name of the patient who is requesting it, but the prescription does not provide for a refill, or the time permitted for providing refills has elapsed.
2. The pharmacist is unable to obtain authorization to refill the prescription from the health care professional who issued the prescription or another health professional responsible for the patient's care.

Ohio Law Permits Dispensing of an Emergency Refill of Medication Without a Prescription *(cont)*

3. In the exercise of the pharmacist's professional judgment:
   (a) The drug is essential to sustain the life of the patient or to continue therapy for a chronic condition of the patient.
   (b) Failure to dispense or sell the drug to the patient could result in harm to the health of the patient.

For more information about this law, visit *www.pharmacy.ohio.gov/emergency*.

FDA Reminds Compounders Not to Use Dietary Supplement-Grade Glutathione for Injectables

FDA is aware of reports of at least 30 patients who experienced adverse events following the administration of intravenous glutathione alone or in combination with other ingredients.

The glutathione was compounded by different compounding pharmacies, all of which obtained their glutathione (Lot #229536) from Medisca, Inc, United States headquarters in Plattsburgh, NY. The glutathione was labeled as dietary supplement grade, which is not an appropriate ingredient to make injectable drugs.

For more information, visit FDA's website at *www.pharmacy.ohio.gov/glutathione*.

Electronic Product Verification Rule Now Effective

On August 19, 2026, OAC 4729:5-3-25 went into effect. This rule permits electronic product verification by pharmacists. "'Electronic product verification' or 'electronic verification' means the non-physical dispensation ('final check') of a drug or device by a pharmacist using an electronic verification system to verify the accuracy of the drug or device and affixed label prior to dispensing."

For more information, a copy of the rule text can be accessed here.



Theft or Significant Loss Reporting Rule Update

Effective August 8, 2026, terminal distributors and wholesale distributors of dangerous drugs now have 45 days (previously 30 days) to report a theft or significant loss to the Board by using the online portal following the discovery of theft and significant loss. The Board made this change to mirror recent changes in federal law.

For more information, visit our website at *www.pharmacy.ohio.gov/Theft*.

Reminder: Veterinary Residents/Interns and Prescribing

The Board would like to remind all licensees that veterinary residents and interns with a valid doctor of veterinary medicine license are permitted to send prescriptions to retail pharmacies for filling. Additionally, these veterinary residents and interns working under a hospital's Drug Enforcement Administration (DEA) registration have full prescribing authority, including for CS.

Board Publishes 2024-2025 Biennial OARRS Report

Pursuant to ORC 4729.85, the Board published the *2024-2025 Biennial Report* from the Ohio Automated Rx Reporting System (OARRS), which can be accessed here. This report focuses on opioid pain relievers and other CS dispensed by pharmacies or personally furnished by prescribers in Ohio.



We Want to Hear From You!

The Board is conducting an optional survey to get feedback from licensees that will help us improve our communication services across our website, social media, and email platforms. The survey will take one to two minutes to complete. If you would like to participate, visit our online survey here.

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.

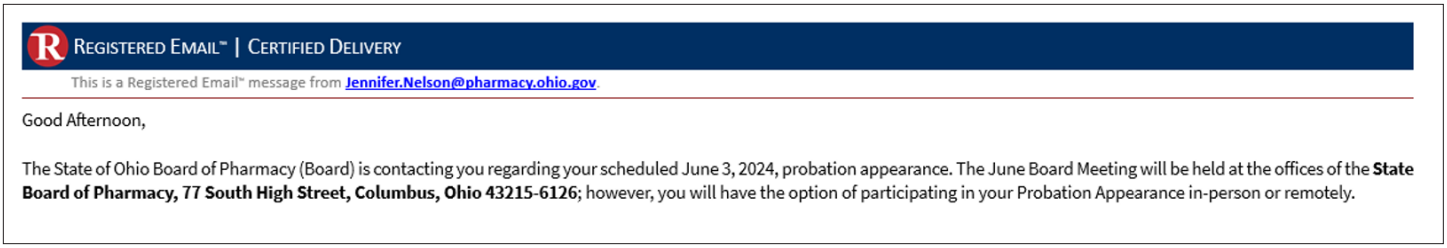
Scammers may try to initiate contact via phone calls, emails, faxes, and letters purporting to originate from various state and federal agencies that include allegations of drug trafficking and threats of suspension against the target's license.

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 by 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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