



UNITED TO ADVANCE HEALTH CARE
AND PHARMACY PRACTICE

PharmView

FPA Discussion Points on Telepharmacy

- **Clarification in HIPAA** – Telepharmacy platforms will need to be encrypted to prevent unauthorized access to confidential patient health information. Those using and participating in telepharmacy services should have the proper HIPAA credentials.
- **Access to Patient Records** – Telepharmacy services should include at a minimum access to all essential patient records needed for health care decision making by the provider pharmacists.
- **Reimbursement for Telepharmacy Services** – The provision of telepharmacy services can be of benefit to the health care system. A comprehensive payment program for the provision of telepharmacy services is needed either in the presence of or the absence of a dispensed prescription.
- **Licensure of Telepharmacy Providers** – The Florida Pharmacy Association believes that those providing telepharmacy services should be licensed as a pharmacist in this state and should also be providing these services in affiliation with a pharmacy permit. Such service providers should have access to a patient's full prescription profile.
- **Telepharmacy Software** – The telepharmacy software should have a comprehensive event log with documentation on the licensee that performed the telepharmacy services and a profile of what services were provided.
- **Pharmacy Practice Act** – The rules related to pharmacy services were created many years ago and over the years changed attempt to clarify existing and new Florida laws. The Board of Pharmacy is limited on what content goes into its rules by what is published in Florida Statutes 465. Those statutes were written many years ago with limited attempts to revise them based upon emerging contemporary practices. The training of pharmacists and the current contemporary practice of this profession has matured far beyond current Florida laws and is in dire need of revision. Pharmacists in collaboration with other health care providers have the ability to not only monitor and manage a patient's health but under protocol have the training and skills to begin, modify and discontinue prescription drug therapy. The barrier to the provision of these services is the current pharmacy practice act. These services can easily be performed through telepharmacy applications but not possible under current Florida laws.
- **Pharmacy Dispensing Services Absent a Pharmacist** – The Florida Pharmacy Association is unable to agree to the provision of pharmacist dispensing services absent the direct supervision of a Florida licensed pharmacist. Telepharmacy services however can be a viable and valuable adjunct to the provision of dispensing services especially when there is a need to bring in specialist pharmacists with unique skills not available at the practice site.