

COVID-19 TESTING BY PHARMACISTS

April 14, 2020

Many companies are soliciting pharmacists with COVID-19 tests to enable the pharmacists to perform this testing in the community pharmacy setting. The Kentucky Board of Pharmacy cautions pharmacists about testing patients for COVID-19 in the community pharmacy setting. At this time, with a patient specific prescription order, pharmacists are permitted to assist in obtaining the sample for send out testing to an appropriate lab and perform Point of Care (POC) testing.

1. The Kentucky Pharmacy Practice Act does not allow pharmacists to independently test patients for COVID-19 as part of the practice of pharmacy. With a patient specific prescription order, pharmacists may collect the nasopharyngeal test sample for send out testing to the appropriate lab. With a patient specific prescription order, pharmacists may perform POC COVID-19 testing.
2. *It is possible the Kentucky Board of Pharmacy will work with the Kentucky Department for Public Health and the Governor's Office to enable pharmacists to provide COVID-19 testing independent of a patient specific prescription order.*
3. Currently, to perform any type of COVID-19 sample collection for send out testing or POC testing, pursuant to a patient specific prescription order, there must be:
 - a. Sufficient access to resources including:
 - i. Training of pharmacy staff to appropriately collect samples for send out testing and conduct POC testing as appropriate tests become available
 - ii. Appropriate Personal Protective Equipment (PPE)
 - iii. Appropriate area within community pharmacy for sample collection for send out testing and POC testing as appropriate tests become available
 - b. Policies and procedures in place for:
 - i. Collecting samples
 - ii. Storing samples
 - iii. Shipping samples
 - iv. Processing samples, including interpreting results (if POC testing is being conducted)
 - v. Infection control, including use of PPE and disinfection of areas used for sample collection and testing
 - vi. Notifying the Kentucky Department for Public Health of Persons Under Investigation (PUI)
 - vii. Notifying the Kentucky Department for Public Health of positive tests
 - viii. Notifying patients of test results
4. There are COVID-19 tests that are fraudulent and not approved by the FDA.
5. There have been examples of so-called COVID-19 clinics offering fraudulent tests in Kentucky.
6. The FDA has approved some tests under the Emergency Use Authorization (EUA). There are two types of tests:

- a. High complexity tests that are not allowed to be performed in a community pharmacy setting. These are the tests pharmacists may collect the nasopharyngeal swab for send out testing, and
 - b. POC testing which may be performed in the community pharmacy setting.
7. Pharmacists are permitted to assist with the collection of nasopharyngeal swabs for send out testing (the high complexity tests) without obtaining a CLIA-waiver.
8. The EUA COVID-19 tests that are POC have not been through the CLIA-waiver process and are not referred to as CLIA-waived tests. However, in order to perform the POC testing at the pharmacy, a CLIA-waiver must be obtained.

The Kentucky Board of Pharmacy will work with the Kentucky Department for Public Health and the Governor's Office to expand the use of pharmacists to help in this pandemic and determine appropriate and legal ways for pharmacists to participate in COVID-19 testing in the community pharmacy setting.