

KENTUCKY BOARD OF PHARMACY
COVID-19 FREQUENTLY ASKED QUESTIONS AND BOARD GUIDELINES

August 4, 2020

The Kentucky Board of Pharmacy is committed to its mission to protect the health and safety of citizens of the Commonwealth of Kentucky during the COVID-19 outbreak.

Please refer to the additional links on the Board's website for more information, including kycovid.gov

The COVID-19 pandemic is fluid and evolving. These questions and answers will be constantly monitored and updated as new information becomes available.

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I. OPERATING PHARMACIES IN A SAFE ENVIRONMENT:

1. What are the recommendations to continue operating a pharmacy?

A: As the state reopens, the Board continues to strongly support efforts by pharmacies and pharmacists to adjust work flows and processes within a pharmacy to reduce the risk of COVID-19 transmission. Such efforts continue to include, but are not limited to: not physically handling patient identifications at the point of dispensing; not requiring a physical signature for pick-up of a prescription; increasing use of prescription delivery, drive-thru, and curbside services; limiting the number of patients physically entering a pharmacy; and enforcing social distancing within a pharmacy. Governor Beshear has issued *Kentucky's Healthy at Work Minimum Requirements for Businesses Including Retail Pharmacies*. Pharmacies must follow these additional requirements. We want pharmacists and staff to remain healthy and able to serve their patients.

Law/Guidance Reference:

[Kentucky's Healthy at Work Minimum Requirements for Pharmacies.pdf](#) (June 11, 2020)
[CDC Guidance for Pharmacies](#) (April 14, 2020)
[Directives from Kentucky Board of Pharmacy Special Called Board Meeting March 25, 2020.pdf](#)
[CDC Guidance Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19](#) (April 9, 2020)
[OSHA Guidance on Preparing Workplaces for COVID-19.pdf](#)
[CDC Steps Healthcare Facilities Can Take](#)
[CDC Guidance for Businesses and Employers to Plan and Respond to COVID-19](#)
[CDC Considerations for Pharmacies During the COVID-19 Pandemic](#) (April 3, 2020)

2. Who determines the appropriate measures to take to operate the pharmacy in a safe manner?

A: The Board emphasizes that the pharmacist-in-charge is the person authorized by law to ensure compliance with pharmacy safety standards. Improper interference with a pharmacist-in-charge's fulfillment of these duties and responsibilities subjects a pharmacy permit holder to potential disciplinary action, up to and including revocation. Likewise, a person licensed by, or registered with, the Board who improperly interferes with a pharmacist-in-charge's fulfillment of these duties and responsibilities is subject to potential disciplinary action, up to and including revocation.

Law/Guidance Reference: 201 KAR 2:205 and KRS 315.121 and

[Directives from Kentucky Board of Pharmacy Special Called Board Meeting March 25, 2020.pdf](#)
[OSHA Guidance on Preparing Workplaces for COVID-19.pdf](#)
[CDC Steps for Healthcare Facilities to Take](#)

[CDC Guidance for Businesses and Employers to Plan and Respond to COVID-19](#)
[CDC Considerations for Pharmacies During the COVID-19 Pandemic](#) (April 3, 2020)

3. What if the pharmacy is not complying with requests from the pharmacist-in-charge or other employees to operate the pharmacy in a safe environment?

A: Kentucky has a website and toll free hot line number to report businesses not complying with the Governor's directives. Issues may also be reported to the Kentucky Board of Pharmacy Executive Director and Inspection Staff.

Law/Guidance Reference: Board of Pharmacy [Kentucky Board of Pharmacy Staff Website: KYSAFER](#)
Toll free hot line number: 1-833-KYSAFER (1-833-597-2337)

4. Can pharmacy staff wear personal protective equipment (PPE) such as masks?

A: Governor Beshear requires everyone to wear a facial covering in public. In addition, Pharmacies must follow the *Healthy at Work Minimum Business Requirements*.

Law/Guidance Reference: [Minimum Business Including Pharmacies Requirements June 11 2020.docx](#)
[Strategies to Optimize the Supply of PPE and Equipment](#) (April 3, 2020)
[OSHA Guidance on Preparing Workplaces for COVID-19.pdf](#)
[EPA Disinfectants for Use Against COVID-19](#)
[CDC Considerations for Pharmacies During COVID-19 Pandemic](#) (April 3, 2020)
[CDC Recommendation Regarding the Use of Cloth Face Coverings](#) (April 3, 2020)

II. EMPLOYEES DEVELOP SYMPTOMS AND RETURNING TO WORK:

1. Should employees be monitored for COVID-19 symptoms?

A: Recommend following the CDC guidance documents listed below.

Law/Guidance Reference: [CDC Guidance for Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19](#) (April 9, 2020)
[CDC Considerations for Pharmacies During the COVID-19 Pandemic](#) (April 3, 2020)
[CDC Guidance for Risk Assessment and Public Health Management of Healthcare Personnel with Potential Exposure in a Healthcare Setting to Patients with COVID-19](#)
[CDC Guidance for Businesses and Employers to Plan and Respond to COVID-19](#)

2. What if a pharmacist or technician develops symptoms or is diagnosed with COVID-19?

A: Recommend following the CDC guidance documents listed below.

Law/Guidance Reference: [CDC Guidance for Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19 \(April 9, 2020\)](#)
[CDC Considerations for Pharmacies During the COVID-19 Pandemic \(April 3, 2020\)](#)
[CDC Guidance for Risk Assessment and Public Health Management of Healthcare Personnel with Potential Exposure in a Healthcare Setting to Patients with COVID-19](#)
[CDC Guidance for Businesses and Employers to Plan and Respond to COVID-19](#)

3. When should an employee who tested positive for COVID-19 or are suspected positive for COVID-19 return to work?

A: Recommend following the CDC guidance documents listed below.

Law/Guidance Reference: [CDC Guidance for Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19 \(April 9, 2020\)](#)
[CDC Considerations for Pharmacies During the COVID-19 Pandemic \(April 3, 2020\)](#)
[CDC Guidance on Return to Work for Healthcare Personnel with Confirmed or Suspected COVID-19](#)
[CDC Guidance for Businesses and Employers to Plan and Respond to COVID-19](#)

III. WORKING REMOTELY:

1. Are pharmacists allowed to work remotely?

A: Pharmacists licensed by the Kentucky Board of Pharmacy may engage in the practice of pharmacy remotely providing the on-site pharmacy has a pharmacy software system with a closed network and a pharmacist present to conduct the final verification and in-person counseling to their patients. All patient personal health information will be protected with the same confidentiality laws in effect today. This modification does not interfere with the requirements of KASPER, which remain in effect. These items shall remain in effect throughout the duration of the State of Emergency. (Updated April 10, 2020)

Law/Guidance Reference: Pursuant to Special Called Board Meeting, March 18, 2020

2. Are technicians allowed to work remotely?

A: Pharmacy technicians registered with the Kentucky Board of Pharmacy may assist with the practice of pharmacy remotely by performing such functions as data entry and payer adjudication providing the on-site pharmacy has a pharmacy software system with a closed network. All patient personal health information will be protected with the same confidentiality laws in effect today. A pharmacy technician may not work in a permitted pharmacy without a pharmacist present. A licensed pharmacist shall provide oversight either in-person or electronically of all tasks and duties performed by the pharmacy technician. These items shall remain in effect throughout the duration of the State of Emergency. (Updated April 10, 2020)

Law/Guidance Reference: Pursuant to Special Called Board Meeting, March 18, 2020

3. Are technicians allowed to work in a permitted pharmacy without a pharmacist present on site?

A: No. Technicians are not allowed to work in a permitted pharmacy without a pharmacist on site. All compounding and dispensing of any drug shall be performed in a Kentucky permitted pharmacy under the supervision of a Kentucky licensed pharmacist who is actively supervising the activities of the technician.

Law/Guidance Reference: 201 KAR 2:100

IV. CHANGING HOURS/ CLOSING PHARMACIES/ OPENING PHARMACIES:

1. What is required if a pharmacy has to change operating hours?

A: It may be necessary to reduce pharmacy hours. Pharmacies are not required to notify the Board of a temporary change of hours during the State of Emergency.

Law/Guidance Reference: Pursuant to Special Called Board Meeting, March 18, 2020

2. What is required if a pharmacy has to temporarily close?

A: Pharmacies are required to notify the Board of temporary closure of a pharmacy during State of Emergency; however, the fifteen day advanced notice has been waived. Pharmacies are required to submit notification of closure within 72 hours.

Law/Guidance Reference: Pursuant to Special Called Board Meeting, March 18, 2020

- 3. Under the State of Emergency (SOE), can a pharmacy open a second location, staffed with a pharmacist and drugs, without obtaining a pharmacy permit from the Kentucky Board of Pharmacy?**

A: No, the SOE declaration does not allow a pharmacy to open a second location without obtaining a pharmacy permit from the Kentucky Board of Pharmacy. It does allow a pharmacy to temporarily relocate provided 201 KAR 2:330 is followed. It does not allow for the pharmacy to stay open and open a second location without a pharmacy permit.

Law/Guidance Reference: 201 KAR 2:330 Section 2

V. NON-KENTUCKY LICENSED PHARMACISTS AND NON-REGISTERED TECHNICIANS WORKING IN KENTUCKY:

- 1. Is the Kentucky Board of Pharmacy allowing pharmacists licensed in other jurisdictions to practice pharmacy in Kentucky?**

A: Yes. The Kentucky Board of Pharmacy is issuing temporary Kentucky pharmacist's licenses for pharmacists not licensed in Kentucky to be able to practice in Kentucky provided the pharmacist is in good standing in his or her original/home state. The temporary license is valid for a period of 90 days, but is renewable if the State of Emergency continues. The fee for licensure is waived.

Law/Guidance Reference: [Directives from Kentucky Board of Pharmacy Special Called Board Meeting March 25, 2020.pdf](#)
[Temporary Licensure due to COVID-19.pdf](#)

- 2. Is the Kentucky Board of Pharmacy allowing technicians from other jurisdictions to assist with the practice pharmacy in Kentucky?**

A: Yes. The Kentucky Board of Pharmacy is issuing temporary registrations for technicians from other jurisdictions not registered in Kentucky to be able to assist with the practice of pharmacy in Kentucky provided the technician is in good standing in his or her original/home state. The temporary registration is valid for a period of 90 days, but is renewable if the State of Emergency continues. The fee for registration is waived.

Law/Guidance Reference: [Directives from Kentucky Board of Pharmacy Special Called Board Meeting March 25, 2020.pdf](#)
[COVID 19\Temporary Licensure due to COVID-19.pdf](#)

VI. FILLING AND REFILLING NON-CONTROLLED SUBSTANCE PRESCRIPTIONS:

- 1. Does the renewal of the Executive Order allow a patient who previously received a 30 day non-controlled substance prescription refill when the pharmacist was unable to contact the prescriber for authorization under the previous Executive Orders, to receive another 30 day refill for the same prescription if the prescriber is unreachable?**

A: Yes. The 30 day refill of a non-controlled prescription is a continuous standing order throughout the duration of the State of Emergency and is not limited to a one time refill if the pharmacist is unable to contact the prescriber. (Updated April 10, 2020)

Law/Guidance Reference: Pursuant to [Executive Order 2020-276 - Renewal of Pharmaceuticals SOE.pdf](#)

- 2. Does the State of Emergency (SOE) allow Kentucky pharmacists to refill non-controlled maintenance medications for non-Kentucky residents?**

A: No. The Governor of Kentucky must declare the SOE, and state the geographical areas it covers, which could not be out of state. Others state may have declared a similar state of emergency, and those pharmacists can check with the other states.

Law/Guidance Reference: KRS 315.500

- 3. During a declared State of Emergency (SOE), if a physician's office is still open and operating and refill requests have been sent but the pharmacist has not heard back, what is the acceptable time frame to wait for authorization before the pharmacist being able to authorize the 30 day refill under the emergency prescription authority?**

A: There is not a clear answer. Per the regulation, if the pharmacist is unable to readily obtain refill authorization, the pharmacist may dispense up to a 30 day supply. There is not a definition of readily. This is a professional call that each pharmacist will have to make on a case by case basis.

Law/Guidance Reference: 201 KAR 2:330, Section 1

- 4. Is Medicare allowing early refills on prescriptions and allowing for a greater than 30 day supply to be dispensed?**

A: Yes. Due to the Governor’s State of Emergency (SOE) declaration and guidance from CMS, the “refill too soon” is being relaxed as is the limit to a 30 day supply. As always, the pharmacist should exercise professional judgement to determine if this is appropriate and patients are not inappropriately hoarding medications.

Law/Guidance Reference: [CMS Guidance.pdf](#)

5. Is Medicaid relaxing the proof of delivery requirements for receipt of prescriptions?

A: Yes.

Law/Guidance Reference: [Medicaid FAQs page 5.pdf](#)

6. Is Medicare allowing prescriptions to be mailed?

A: Yes.

Law/Guidance Reference: [CMS Guidance.pdf](#)

VII. PRESCRIPTIONS FOR OFF-LABEL USE FOR COVID-19

1. Prescribers are writing prescriptions for the drugs that are in trial to treat COVID-19, such as chloroquine, hydroxychloroquine, mefloquine, and azithromycin. What are the recommendations for a pharmacist to dispense these prescriptions?

A: At the July 29, 2020 Board Meeting, the Kentucky Board of Pharmacy rescinded the previous recommendations regarding chloroquine, hydroxychloroquine, mefloquine, and azithromycin.

For drugs being prescribed for off-label use for COVID-19, the Board encourages pharmacists to use professional judgement to determine if a valid patient-prescriber relationship exists, if the quantity prescribed is appropriate, and if there is a need to obtain a diagnosis. There are patients receiving these medications on a regular basis for their FDA indicated use or literature supported use, therefore, pharmacists need to consider the amount of drug in stock when determining which prescriptions to dispense.

Law/Guidance Reference: Minutes from the July 29, 2020 Board Meeting will be available on a future date.

- 2. Prescribers are writing prescriptions for lopinavir and ritonavir (Kaletra), sirolimus (Rapamune) and/or sarilumab (Kevzara) for off labeled use to treat or for prophylaxis for COVID-19. Are the prescriptions appropriate to dispense?**

A: For drugs being prescribed for off-label use for COVID-19, the Board encourages pharmacists to use professional judgement to determine if a valid patient-prescriber relationship exists, if the quantity prescribed is appropriate, and may need to obtain a diagnosis. There are patients receiving these medications on a regular basis for their FDA indicated use or literature supported use, therefore, pharmacists need to consider the amount of drug in stock when determining which prescriptions to dispense.

Law/Guidance Reference: Minutes from the July 29, 2020 Board Meeting will be available on a future date.

- 3. What are some indications of possible inappropriate prescribing of these medications?**

A: 1. Medication hoarding/stockpiling.

a. Prescriptions written for excessive amounts.

b. Prescriptions written for extended durations of therapy not consistent with the diagnosis provided.

2. Prescriptions written for people who did not have a valid patient-prescriber relationship.

a. Family and friends of healthcare providers.

3. Prescriptions written by practitioners whose specialties or practice setting is not indicative of treating COVID-19 patients, i.e. dentist, ophthalmologist, podiatrist.

Law/Guidance Reference: Minutes from the July 29, 2020 Board Meeting will be available on a future date.

VIII. COMPOUNDING:

- 1. Is the Kentucky Board of Pharmacy allowing pharmacists compound hand sanitizer that is not for a patient specific prescription?**

A: Yes. Please follow the FDA, USP and WHO guidance documents.

Law/Guidance Reference: [FDA Policy on Compounding Hand Sanitizer 3.27.2020.pdf](#)
[USP Compounding Alcohol-Based Hand Sanitizer 3.25.2020.pdf](#)
[WHO Guide to Local Production of Hand Sanitizer.pdf](#)

2. Is the Kentucky Board of Pharmacy allowing pharmacists to reuse Personal Protective Equipment (PPE) in sterile compounding?

A: Yes. During this time of shortage of equipment and supplies for sterile compounding, please use available resources from FDA, CDC, USP, Critical Point, ASHP, and other peer networks as well as your own organization to develop a plan that takes care of patients but maintains the integrity of the preparations. The Kentucky Board of Pharmacy Inspection staff will be exercising appropriate risk based enforcement discretion during the time of PPE shortage.

Law Reference/Guidance: [FDA Temporary Policy Non-Standard PPE Practices for Sterile Compounding.pdf \(April 10, 2020\)](#)
[CDC Recommendation Healthcare Supply of PPE](#)
[USP Response to Shortages of Garb and PPE Sterile Compounding.pdf](#)

3. Is the Kentucky Board of Pharmacy allowing pharmacists to reuse Personal Protective Equipment (PPE) in non-sterile compounding?

A: Yes. While there is not specific guidance addressing PPE used in non-sterile compounding at this time, some of the available resources regarding sterile compounding and PPE in general as well as other peer networks and your own organization may be used to develop a plan that takes care of patients but maintains the integrity of the preparations. The Kentucky Board of Pharmacy Inspection staff will be exercising appropriate risk based enforcement discretion during the time of PPE shortage.

Law Reference/Guidance: [CDC Recommendation Healthcare Supply of PPE](#)
[USP Response to Shortages of Garb and PPE Sterile Compounding.pdf](#)

IX. CONTROLLED SUBSTANCES:

1. Does the DEA waiver allow for verbal authorization of Schedule II prescriptions in Kentucky?

A: No, not at this time. The DEA stated, due to the public health emergency, telemedicine can be used to prescribe controlled substances and the requirement for an in-person medical evaluation has been waived. But, the prescription must be for a legitimate purpose issued in the practitioner's normal course of business, the telemedicine communication is audio-visual, real time, two way; and the practitioner must follow state and federal laws.

The notice further states controlled substance prescriptions may be e-prescribed, or verbally authorized, including for an emergency Schedule II prescription. Verbally authorized Schedule II prescriptions must be follow-upped with a hard copy prescription

in the form of a facsimile, photograph or scan of the paper copy and not the paper copy itself within 15 days.

Kentucky law does not allow for an emergency Schedule II prescriptions except in limited scenarios, Hospice and LTC.

Recommendations:

- E-prescribe (will have to by January 1, 2021 anyway);
- If it is a continuation of therapy, have the patient telemedicine seen and mail the prescription to the pharmacy in advance;
- If the patient is going to travel to the pharmacy to have the prescription filled, have the patient come to the practitioner's office and have someone bring it to the patient's car to take to the pharmacy;
- Have someone from the practitioner's office or a courier take it to the pharmacy
- Have someone from the pharmacy pick it up.

Like everything, this will be re-evaluated by CHFS to determine if it will be allowed in the future.

Law/Guidance Reference: 902 KAR 55:095 Section 2 and [Applicable Kentucky Controlled Substances Law 4.2.2020.pdf](#)
[DEA Coronavirus Information](#)

2. May a pharmacist dispense or refill a controlled substance prescription early?

A: Yes, as long as the prescriber has not indicated a “do not fill until” date. There is no Federal or Kentucky law dictating how early a controlled substance prescription refill may be dispensed or how early a continuation of therapy on a Schedule II controlled substance prescription may be dispensed. Pharmacists are to use professional judgement in making the determination of when to dispense a controlled substance prescription. If pharmacists are determining it is appropriate to dispense a controlled substance prescription early due to issues such as patient's self-isolation during the State of Emergency, it is recommended that the pharmacists document the situation.

Law/Guidance Reference: Recommendation and [DEA Coronavirus Information](#)

3. If a physician issues multiple Schedule II prescriptions for a patient, all dated the date issued with instructions to not fill some of the prescriptions until a certain date (a “do not fill until” date), can the pharmacist contact the physician and change the “do not fill until” date?

A. No. When the prescription contains instructions from the physician stating the prescription cannot be filled until a certain date, a pharmacist may not fill the prescription before that date.

Law/Guidance Reference: 21 CFR 1306.14(e)

X. QUARTERLY SITE VISITS FOR MANUFACTURERS AND MEDICAL GAS FACILITIES:

1. Does the pharmacist have to complete the quarterly site visit inspections for manufacturers and medical gases?

A: RECOMMENDATION: If facility is closed to anyone other than employees or limiting access, the pharmacist should do what is practical remotely, such as have the facility take pictures, review orders if confidentiality can be maintained, review other records such as COA, purchase records, tracking logs, etc., and document that as well as document why the quarterly inspection was not on-site. Perform an on-site inspection as soon as the situation has abated. During our next inspection time, we will not cite them as non-compliant for this quarter or later if it extends.

Law/Guidance Reference: Recommendation

XI. PSEUDOEPHEDRINE

1. A person buying pseudoephedrine has an expired driver's license. May the pharmacist sell the pseudoephedrine?

A: Yes. Governor Beshear issued an Emergency 90-day extension on renewing driver's licenses.

Law/Guidance Reference: [Official Order No. 112155 Emergency 90-Day Extension of Driver Licenses.pdf](#)

XII. TECHNICIANS

1. Is there a waiver for pharmacies to allow people to work as a technician without registering with the Kentucky Board of Pharmacy?

A: No, not at this time. Technician registration is done electronically and can be done in less than 30 minutes. If the person has not been registered as a technician before, there is a 30 day time period in which to register the person.

Law/Guidance Reference: KRS 315.135 (2)(a)

2. Can a non-certified technician fill an Automated Dispensing System (ADS) in a hospital?

A: No, not at this time. This was discussed at the March 18, 2020, Special Called Board Meeting, but the Board of Pharmacy did not act at this time to waive the requirement of a certified pharmacy technician filling the ADSs. Filling the ADSs is one of the few tasks requiring a certified technician.

Law/Guidance Reference: 201 KAR 2:074 Section 7(3) and (4)

XIII. IMMUNIZATIONS

1. Should pharmacists continue to immunize patients?

A: The Kentucky Department of Public Health is recommending pharmacists continue immunizations as scheduled and efforts should be made to provide vaccinations missed during the initial COVID-19 pandemic emergency. Focus should be on school aged children and adolescents who may be behind on school requirements. Pharmacists should have a robust influenza campaign established for the Fall.

Law/Guidance Reference: [CDC Vaccination Guidance During a Pandemic June 9, 2020](#) and Kentucky Department of Public Health Recommendation

XIV. THERAPEUTIC SUBSTITUTION

1. May a pharmacist substitute a therapeutically equivalent drug without contacting the prescriber?

A. On April 8, 2020, the Board of Pharmacy suspended portions of 201 KAR 2:280, allowing a pharmacist to dispense a therapeutically equivalent drug product if the drug is on the FDA Drug Shortage List. Please see the Suspended Regulations Document from April 8, 2020.

Law/Guidance Reference: 201 KAR 2:280 and [Regulation Amendments 4.8.2020.pdf](#)

XV. LONG TERM CARE FACILITY STOCKING OF DRUGS

1. Who may stock the drugs at a long term care facility (LTCF)?

A. In an effort to limit the number of people entering long term care facilities, the Kentucky Board of Pharmacy is suspending parts of 201 KAR 2:370 to allow for LPNs and RNs to stock non-controlled substances in LTCF. Please see the Suspended Regulations Document from April 8, 2020.

Law/Guidance Reference: 201 KAR 2:370 and [Regulation Amendments 4.8.2020.pdf](#)

XVI. PHARMACIST-IN-CHARGE

1. What if a pharmacist-in-charge (PIC) cannot be named within 14 days due to the COVID-19 pandemic?

A. Due to the difficulty that may be encountered during the COVID-19 pandemic in staffing pharmacies, including naming a pharmacist-in-charge (PIC), the Kentucky Board of Pharmacy is exercising enforcement discretion regarding parts of 201 KAR 2:205. Please see the Suspended Regulations Document from April 8, 2020.

Law/Guidance Reference: 201 KAR 2:205 and [Regulation Amendments 4.8.2020.pdf](#)

XVII. INITIAL PHARMACIST LICENSURE APPLICATION

1. How are fingerprints to be submitted?

A. The Board of Pharmacy has posted “KY Fingerprint Guide During COVID-19” on the Board’s website:

- www.pharmacy.ky.gov
- On left hand side of the home page: click “Professionals”
- Click “Pharmacist Information”
- Under the second question, “How do I . . . Apply for Initial Licensure?” click on “Initial Pharmacist Licensure”

Law/Guidance Reference: [Regulation Amendments 4.8.2020.pdf](#)

2. Is the Initial Application for Pharmacist Licensure required to be notarized?

- A. Due to the prohibition of in-person work that is not necessary to protect or sustain life in Executive Order 2020-257, the Board of Pharmacy has suspended the requirement of a notarized signature on the Initial Application for Pharmacist Licensure.

Law/Guidance Reference: 201 KAR 2:020 and [Regulation Amendments 4.8.2020.pdf](#)

XVIII. TESTING BY PHARMACISTS IN THE COMMUNITY PHARMACY SETTING

1. May a pharmacist initiate a COVID-19 test?

- A. Yes, as of April 24, 2020, a pharmacist does not need an order from a practitioner to initiate a COVID-19 test. However, the pharmacist must:
- a. Use a test that is authorized by the U.S. Food and Drug Administration (FDA);
 - b. Have education and be trained on the test;
 - c. Have a CLIA certificate of waiver;
 - d. Have policies and procedures in place to address:
 - i. Appropriate collection, storage, and transport of samples pursuant to the test being used;
 - ii. Conducting the test according to manufacturer's directions;
 - iii. Infection control, including appropriate use of PPE and disinfection of testing area;
 - iv. Notification to the Kentucky Department for Public Health of Persons Under Investigation (PUI) and positive tests; and
 - v. Notification of persons of their test results.

Law/Guidance Reference: [Secretary Order to Authorize Pharmacist Testing April 24, 2020.pdf](#)