



# **Board of Pharmacy**

## **Office of Professional Regulation, Vermont Secretary of State**

89 Main Street, 3<sup>rd</sup> Floor • Montpelier, VT 05620-3402  
<https://sos.vermont.gov/opr/>

OPR is holding this meeting in accordance with 1 V.S.A. §§ 310-314. The majority of the Board and OPR staff will be participating remotely. OPR recommends you participate remotely.

[Click here to join the meeting from your computer or mobile app](#), Or call in for audio only

**Phone number: 1(802)828-7667, Phone Conference ID: 70719433#**

If you cannot attend the meeting remotely, connection to the meeting will be available at the Office of Professional Regulation, 89 Main Street, 3rd floor, Montpelier, VT 05602.

### **Agenda**

**Wednesday, September 22<sup>nd</sup>, 2021, at 9:00 a.m.**

- 1. Call to Order**
- 2. Changes to the agenda**
- 3. Approval minutes of August 25<sup>th</sup>, 2021**
- 4. Discipline:**
  - a. 9:30am – Brian Badgley, Docket # 2021-105: Request for Summary Suspension  
(Recuse: Corey Duteau)
- 5. Quarterly Inspector Report**
- 6. Executive Officer Update**
  - a. Executive Officer Report
  - b. Entity License Approvals Since Last Month
- 7. Topics for Discussion**
  - State Protocols for Clinical Pharmacy Prescribing – first draft review, *SEE PAGES 2 and 3*
    - emergency prescribing of albuterol or glucagon while contemporaneously contacting emergency services
    - epinephrine auto-injectors
  - MPJE discussion – recap and decision making re eliminating its requirement
  - Rules revisions, as applicable
  - Review newly posted USP <795> and <797> revisions
  - Conflict of October BOP meeting date with FDA meeting
- 8. Correspondence**
- 9. Other Business**
- 10. Public Comment**
- 11. Discuss items for inclusion on next month's agenda**
- 12. Adjournment**

Next Scheduled Meeting – Wednesday, October 27<sup>th</sup>, 2021

## **Vermont Pharmacist Prescribing Protocol – Emergency Prescribing of Albuterol and Glucagon While Contemporaneously Contacting Emergency Services**

### **Background**

A pharmacist may prescribe albuterol and glucagon in a manner consistent with a valid State protocol approved by the Commissioner of Health, after consultation with the Director of Professional Regulation and the Board of Pharmacy (BOP). 26 V.S.A. § 2023(b)(2)(A)(i).

Pharmacists who independently prescribes albuterol or glucagon must follow this protocol. When prescribing per this protocol, the pharmacist is the prescriber-of-record.

### **Definitions**

“Emergency prescribing” in this context means prescribing and dispensing of albuterol and glucagon to someone who is experiencing a respiratory or hypoglycemic emergency

### **General Considerations**

Prescribing albuterol or glucagon under this protocol requires the pharmacist to:

1. Have training and education in that area sufficient to perform the duties involved.
2. Document prescribing, including notifying the patient's primary care provider within 5 business days.
3. Keep a written copy of the protocol at each location from where prescriptions are issued for, or dispensing of, an epinephrine auto-injector occurs.
4. Provide a copy of the protocol available upon the request of an inspector.

Pharmacists and pharmacies are encouraged to post a notice or to otherwise alert customers that pharmacists may prescribe albuterol and glucagon in the setting of an emergency for which these medications are indicated.

### **Procedures**

When an individual actively experiencing an emergency for which albuterol or glucagon are indicated, or their representative, presents to the pharmacy; or when a pharmacist in his or her professional judgement deems it necessary to prescribe albuterol or glucagon to such an individual, the pharmacist shall complete the following steps:

1. Immediately dispense the necessary product and initiate contact with emergency services, performing the usual prescription processing afterwards
2. Provide oral or written counsel to the recipient, or their representative, on the product dispensed to include:
  - a. administration
  - b. effectiveness
  - c. adverse effects
  - d. storage conditions and shelf-life
  - e. any other information deemed necessary in the professional judgment of the pharmacist

## **Vermont Pharmacist Prescribing Protocol – Epinephrine Auto-Injectors**

### **Background**

A pharmacist may prescribe epinephrine auto-injectors in a manner consistent with a valid State protocol approved by the Commissioner of Health, after consultation with the Director of Professional Regulation and the Board of Pharmacy (BOP). 26 V.S.A. § 2023(b)(2)(A)(i).

Pharmacists who independently prescribes epinephrine auto-injectors must follow this protocol. When prescribing per this protocol, the pharmacist is the prescriber-of-record.

### **Definitions**

“Epinephrine auto-injector” means a single-use device that delivers a premeasured dose of epinephrine.

“Recipient” means the person to whom an epinephrine auto-injector is being supplied. The recipient might be someone other than the person for whom the use of the epinephrine auto-injector is intended. Per [16 V.S.A § 1388\(b\)](#), the recipient may be a school.

### **General Considerations**

Prescribing an epinephrine auto-injector under this protocol requires the pharmacist to:

1. Have training and education in that area sufficient to perform the duties involved.
2. Document prescribing, including notifying the patient's primary care provider within 5 business days.
3. Keep a written copy of the protocol at each location from where prescriptions are issued for, or dispensing of, an epinephrine auto-injector occurs.
4. Provide a copy of the protocol available upon the request of an inspector.

Pharmacists and pharmacies are encouraged to post a notice or to otherwise alert customers that pharmacists may prescribe and dispense epinephrine auto-injectors.

### **Procedures**

When an individual requests an epinephrine auto-injector, or when a pharmacist in his or her professional judgement offers to prescribe an epinephrine auto-injector to an individual, the pharmacist shall complete the following steps:

1. Determine which product is best for the intended patient(s), i.e., pediatric, adult, cost, insurance coverage, ease of use, etc.
2. Counsel the recipient on the product dispensed and provide appropriate written information, to include:
  - a. administration
  - b. effectiveness
  - c. adverse effects
  - d. storage conditions and shelf-life
  - e. a recommendation that 911 be called if epinephrine is administered
  - f. any other information deemed necessary in the professional judgment of the pharmacist