



**South Dakota  
Board of Pharmacy**

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**MEMORANDUM**

**TO:** SOUTH DAKOTA PHARMACISTS IN CHARGE

**FROM:** SOUTH DAKOTA BOARD OF PHARMACY - *RSK*

**DATE:** MARCH 18, 2020

**RE:** COVID-19 UPDATE

Thank you for all you are doing to take care of South Dakota patients. This is a very challenging time for everyone. I have been trying to get this out for days, but things are changing so rapidly, I haven't been able to keep up to get it all on paper. Above all, you and your staff should heed the CDC guidelines as much as possible to be able to stay safe and healthy for your patients and your families. Encourage drive up or delivery. Clean high touch areas frequently. Do what is right. Below are a few items which may be of assistance.

By Executive Order, the South Dakota Board of Pharmacy office will be closed March 16 - 20, 2020 to control the spread of COVID-19; if you need assistance, staff will be available during this week by email or phone. At this point, the office will reopen on Monday, March 23, 2020 at 8:00 a.m. (CST). More to come.

On Friday, March 13, 2020, the Governor declared a COVID-19 state of Emergency in South Dakota, which generally allows reasonable suspension of the rules. The Board of Pharmacy has had many requests to suspend rules which may be necessary in light of the current situation.

1. We have been asked to suspend the signature requirement for non-controlled substance prescriptions to help avoid the spread of COVID-19. While this lies with insurance companies and is not in our regulations, we ask that insurance plans suspend this requirement for high risk individuals and that they not audit pharmacies for compliance for the time period pharmacies are taking care of patients in this pandemic emergency. For high risk individuals only, we advise pharmacies not require signature; but document something to the effect that patient refused, or high risk/corona. If a patient is willing to enter a store and make all contact with merchandise and other individuals, we feel the pharmacy should encourage them to sign as is required by their contract. Ensure that cleaning is done regularly on high touch areas.
2. Many insurance companies/ PBM's have loosened the refill too soon and prior authorization requirements. We know some Prior Authorizations have had 90 days added to them.

3. In an emergency, where there is no availability to reach a prescriber to reorder a medication, or to reach a pharmacy (closed due to illness) to transfer a prescription, the pharmacist may fill any non-controlled substance with the supply that is needed (under the previous/current prescriber's name) to care for the patient until the next availability of the prescriber or pharmacy which should be no more than one thirty day supply. The prescriber or pharmacy must be notified of this dispensation.
4. Hand sanitizer may be compounded for customer need as outlined in the FDA Guidance Document which may be found at <https://www.fda.gov/media/136118/download>. Strict adherence to the Guidance must be followed.
5. Garb shortages are common. This situation has precipitated changes in protocol due to the shortage and stewardship of current supplies. Most changes based upon FDA and Critical Point guidance are acceptable: <https://www.fda.gov/medical-devices/letters-health-care-providers/surgical-mask-and-gown-conservation-strategies-letter-healthcare-providers>. Other approaches to save PPE may include instances where you follow USP 797 immediate use criteria for low risk compounding. This could occur when typical compounding would be within a compounding hood thereby requiring the use of more supplies. This may occur if administration will begin within 1 hour as defined in USP 797.
6. If needed, work at home for pharmacists and technicians, is acceptable pursuant to the Board Policy Statement on our web site. If the needs are different, we will review/approve this needed with Policies and Procedures sent to the Board for approval.

Other Information:

1. Pearson VUE has closed until April 16, delaying all pharmacy related testing until after that time.
2. The State of SD mandated the Board to cancel inspections for the next three weeks.
3. The State of SD mandated that all non-essential travel be avoided.
4. COVID-19 Tests are short supply. Until that changes it may be difficult for your patients and staff to be tested unless they fit into high risk designations i.e. travel or close contact with a positive diagnosis. Use the CDC guidance for health care facilities.  
<https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-risk-assesment-hcp.html>
5. The Board of Pharmacy currently plans to conduct our regularly scheduled Board Meeting remotely on April 2, 2020.

When all systems fail, please use your best professional judgement to take care of patients during this time. The Board will support efforts to protect the health and safety of South Dakota patients.