#### Illinois Department of Financial and Professional Regulation Division of Professional Regulation Drug Compliance Unit 9511 Harrison Street, Suite LL 50, Des Plaines, IL 60016

Phone: (847) 294-4900

# (Read this Page Carefully)

# **TELEPHARMACY- AUTOMATED PHARMACY SYSTEMS**

#### **Pharmacy Self-Inspection Form**

Illinois Law holds the Pharmacist-in-Charge (PIC) and all pharmacists on duty responsible for ensuring pharmacy compliance with all state and federal laws governing the practice of pharmacy.

The primary objective of this report, and your self-inspection, is to provide an opportunity to identify and correct areas of non-compliance with state and federal law. The inspection report also serves as a necessary document used by the Drug Compliance investigators during an inspection to evaluate a pharmacy's level of compliance. When a Drug Compliance investigator discovers an area of non-compliance, he or she may issue either a Deficiency Notice or a Notice of Non-Compliance. Both require a written response from the PIC. Identifying or correcting an area of non-compliance prior to a Drug Compliance investigator inspection may eliminate the receipt of a Deficiency Notice/Notice of Non-Compliance for that item.

#### <u>Failure to complete this report by December 31st of each year may result in Disciplinary</u> <u>Action.</u> (Section 1330.800)

NOTE: Neither the self-inspection nor a Drug Compliance investigator inspection evaluates your complete compliance with <u>all</u> Laws and Rules of the practice of pharmacy. Further, nothing herein shall constitute a waiver of IDFPR enforcement discretion or constitute compliance with all applicable Laws and Rules governing the practice of pharmacy. This report is not final agency action and is intended as guidance. This report is not intended, nor can it be relied upon to create any rights enforceable by any party in litigation or in any enforcement action brought by IDFPR.

#### STATE OF ILLINOIS DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION DRUG COMPLIANCE UNIT 9511 HARRISON STREET, SUITE LL 50 DES PLAINES, IL 60016-1563

PHONE NUMBER: 847-294-4900

# (KEEP CURRENT THROUGHOUT THE YEAR, AS NEEDED)

AUTOMATED PHARMACY SYSTEMS				INSPECT	ION D	ATE				
HOME PHARMACY				REMOTE AUTOMATED PHARMACY						
				SYSTEM (RAPS) OR KIOSK						
BUSINESS NAME				BUSINESS NAME						
ADDRESS					ADDRESS					
CITY					CITY					
ZIP CODE					ZIP COD	E				
TELEPHON	Ξ									
E-MAIL										
OPERATING					OPERAT					
							JUKS			
M-F					M-F					
SAT-					SAT-					
SUN	_				SUN					
OWNERSHI					OWNERS					
	al pharmacist				NAME					
🗌 🗌 Individua	al Non-pharm	acist			TELEPHONE					
Partners	hip				E-MAIL					
Corpora	tion									
					PHARMACIST IN CHARGE					
LICENSE NO.		EXPIRES			REMOTE			EXPIRES		
					LICENSE NO	<b>D</b> .				
DEA REG. NO.		EXPIRES			DEA REG. NO.			EXPIRES		
ICSA LICENSE NO.		EXPIRES			ICSA LICENSE NO			EXPIRES		
LIST OF PHA		AT WILL SUPE	RVISE	LIC	ENSE NUI			I		
THE AUTOM	ATED PHARMA	CY SYSTEM								

NAME		ADDRE	SS	PHONE NUMBER
1.				
2.				
QUESTION GENERAL	YES	NO	N/A	AUTHORITY
Pharmacy is compliant with Section 1330.510 of the Ilinois Pharmacy Practice Act Rules, Telepharmacy Practice.				68 Administrative Code Section 1330.510
The PIC has personally reviewed the licenses of all egistrants and determined that they are current.				68 Administrative Code Section 1330.660
All pharmacy technicians and certified pharmacy echnicians have completed the required training set orth in the Act and Rules.				68 Administrative Code Section 1330.210
Meet all the requirements when there is a change in Pharmacist-in-Charge including but limited to proper notification to the Department and completing Controlled Substance Inventory.				68 Administrative Code Section 1330.660
The schedule during which pharmacy services are provided is conspicuously displayed.				68 Administrative Code Section 1330.500(b)(1
Each site where such telepharmacy operations occur shall be a separately licensed pharmacy.				68 Administrative Code Section 1330.510(a)
Each site where such telepharmacy operations occur shall have a home pharmacy.				68 Administrative Code Section 1330.510(a)
Home pharmacies that are located outside of Illinois must be licensed as a nonresident pharmacy. Nonresident pharmacies shall abide by all Illinois aws and rules when filling prescriptions for Illinois residents, except as otherwise provided in the Rules.				68 Administrative Code Section 1330.510(a)
All pharmacists performing services in support of a emote dispensing site, remote consultation site, kiosk, or RAPS must display a copy or electronic mage of their licenses at the remote site where they provide services, or shall otherwise make their icense visible to the patient, and be licensed in this State, unless employed by a pharmacy licensed in llinois as a nonresident pharmacy, in which case, he pharmacist providing the services shall hold an active license as a pharmacist in the state in which he nonresident pharmacy is located and only the pharmacist-in-charge of the remote site must be icensed in Illinois.				68 Administrative Code Section 1330.510(e)
Each remote site must display a sign, easily riewable by the customer, that states: The facility is a telepharmacy supervised by a pharmacist located at (address).				68 Administrative Code Section 1330.510(f)
No remote site may be open when the home oharmacy is closed, unless a pharmacist employed				68 Administrative Code Section 1330.510(g)

present at the remote site or is remotely providing supervision and consultation as required under this Section.		
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SEC	URITY, SANITATION AND STORAGE	YES	NO	N/A	AUTHORITY
Secu devic	rity provisions are provided for all drugs and es within the RAPS and Kiosk.				68 Administrative Code Section 1330.600
	armacy may use an automated pharmacy m to deliver prescriptions to a patient when the e:				68 Administrative Code Section 1330.510(d)(3)
A)	Is secured against a wall or floor;				
B)	Provides a method to identify the patient and delivers the prescription only to that patient or the patient's authorized agent;				
C)	Has adequate security systems and procedures to prevent unauthorized access, to comply with federal and State regulations, and to maintain patient confidentiality; and				
D)	Records the time and date that the patient removed the prescription from the system.				
The I locati	RAPS or Kiosk is placed in a clean and sanitary on.				68 Administrative Code Section 1330.630
	RAPS or Kiosk shall be placed in a well-lighted properly ventilated location.				68 Administrative Code Section 1330.610(c)
	xpired medications are stored with active stock RAPS or Kiosk.				68 Administrative Code Section 1330.630
	ontrolled substances are stored securely within APS or Kiosk.				77 Administrative Code Section 3100.340

DISPENSING AND RECORDKEEPING FOR REMOTE AUTOMATED PHARMACY SYSTEMS (RAPS)	YES	NO	N/A	AUTHORITY
These devices shall maintain a prescription drug inventory that is controlled electronically by the home pharmacy or, when operated by a pharmacy contracted with the home pharmacy, by the contracted pharmacy, which shall be utilized to dispense patient specific prescriptions.				68 Administrative Code Section 1330.510(d)(1)(A)
These systems shall have prescription inventory, which must be secured in an automated pharmacy system and electronically connected to and controlled by the home pharmacy.				68 Administrative Code Section 1330.510(d)(1)(B)
A pharmacist must approve all the prescription orders before they are released from the RAPS.				68 Administrative Code Section 1330.510(d)(1)(C)

	g and counseling are performed by a	68 Administrative Code
pharmacis	st employed or contracted by the home	Section
pharmacy	via audio/video link.	1330.510(d)(1)(D)
The pharn	nacist-in-charge of the home pharmacy, or	68 Administrative Code
	ted registrant, shall conduct and complete	Section
	spections of the RAPS. Inspection criteria	1330.510(d)(1)(F)
	included in the policies and procedures for	
	The report must be available to the	
	investigators when requested.	
		69 Administrative Code
	S must be licensed with the Division as an	68 Administrative Code
	d pharmacy system and will be subject to	Section
	spection by pharmacy investigators. For	1330.510(d)(1)(G)
	of random inspections, a pharmacist with	
access to	the system must be available at the site	
within one	hour, or as otherwise approved by the	
drug com	pliance investigator.	
	n dispensed at the automated pharmacy	68 Administrative Code
	e may only be packaged by a licensed	Section
	urer or repackager, or prepackaged by a	1330.510(d)(1)(H)
	harmacy in compliance with this Section.	
	ging must occur at the home pharmacy, a	
	sharing common ownership with the home	
	, or a pharmacy that has contracted with	
	pharmacy to perform prepackaging	
	The following requirements shall apply	
	medications are prepackaged by a	
pharmacy	other than the home pharmacy:	
i) ii)	The prepackaging pharmacy shall be licensed in Illinois as a resident or nonresident pharmacy. The prepackaging pharmacy shall share	
iii)	a common database with the home pharmacy, or have in place an electronic or manual process to ensure that both pharmacies have access to records to verify the identity, lot numbers and expiration dates of the prepackaged medications stocked in the RAPS. The prepackaging pharmacy shall	
	maintain appropriate records to identify the responsible pharmacist who verified the accuracy of the prepackaged medication.	
	escriptions may be received at an RAPS.	68 Administrative Code
	prescriptions presented to an RAPS shall	Section
the review	ed utilizing imaging technology that permits ving pharmacist to determine its	1330.510(d)(1)(l)
authentici		
	drug prescriptions and records must be	21 CFR §1304.04
properly fi	led and maintained.	
Controllec	substance purchase invoices are signed	77 Administrative Code
	n a separate file.	Section 3100.510
	1	

DEA 222 Form properly documented.	77 Administrative Code Section 3100.500
Procedure to ensure proper drug recall process	
Proper transferring of prescriptions and handling of transferred prescriptions	68 Administrative Code Section 1330.720
Electronically transmitted prescriptions are only being received directly from the prescribing practitioner or agent.	225 ILCS 85/3 (z)

DISPENSING AND RECORDKEEPING OF KIOSK	YES	NO	N/A	AUTHORITY
A Kiosk is a device that maintains individual patient prescription drugs that were verified and labeled at the home pharmacy.				68 Administrative Code Section 1330.510(d)(2)(A)
A home pharmacy may only use the Kiosk with prior approval of a patient.				68 Administrative Code Section 1330.510(d)(2)(B)
A Kiosk located on the same premises or campus of the home pharmacy shall operate under the same license as the home pharmacy. However, a kiosk must be licensed with the Division if it is not so located.				68 Administrative Code Section 1330.510(d)(2)(C)
A Kiosk shall: i) When located on the same premises or campus as the pharmacy, inform a patient, if he or she is using the device when the pharmacy is open, that the patient may address questions and concerns regarding the prescription to a pharmacist at the pharmacy;				68 Administrative Code Section 1330.510(d)(2)(D)
ii) When not located on the same premises or campus as the pharmacy, inform a patient, if he is using the device when the pharmacy is closed, that he or she may immediately direct any questions and concerns regarding the prescription to a licensed pharmacist via a pharmacy provided audio/video link;				
iii) Inform a patient that a prescription is not available to be delivered by the device if the pharmacist has determined that he or she desires to counsel the patient in person regarding the prescription.				

DISPENSING AND RECORDKEEPING OF RAPS AND KIOSK	YES	NO	N/A	AUTHORITY
All controlled substances are dispensed in Good Faith.				720 ILCS 570/312(h)
Annual inventory of controlled substances are properly recorded, dated and signed.				77 Administrative Code Section 3100.360

Controlled substance data collection is submitted to the Prescription Monitoring program as required at least once a week if appropriate.	720 ILCS 570/316
Any theft or significant loss of controlled substances are immediately filed using the DEA form 106 with the Drug Enforcement Administration, with a copy to the Division of Professional Regulation directed to the attention of the Drug Compliance investigator.	68 Administrative Code Section 1330.710
Records for returned drugs are properly maintained.	68 Administrative Code Section 1330.750
All records are maintained for 5 years and are readily retrievable.	

LABE	LING	YES	NO	N/A	AUTHORITY
	d prescription must have a label that meets the ments of the Act attached to the final drug ner.				68 Administrative Code Section 1330.510(d)(1)(E)
All pre	scriptions are labeled with:				225 ILCS 85/22
1.	Pharmacy name and address;				
2.	Date and initials of person authorized to dispense;				
3.	Name of patient;				
4.	Prescription number;				
5.	Prescriber's last name;				
6.	Directions of use, quantity and dosage; and				
7.	Name of the drug.				
name a manufa	epackaged drug must have a label affixed- and strength of the drug, name of the acturer or distributor, beyond use date, lot r on each container.				68 Administrative Code Section 1330.730

### DO NOT SEND ANY PART OF THIS REPORT TO THE DEPARTMENT! KEEP IN THE PHARMACY FOR DRUG COMPLIANCE INVESTIGATOR'S REVIEW. COPIES SENT TO THE DEPARTMENT WILL BE DISCARDED.

I hereby certify that I have verified that this pharmacy is in compliance with all laws and rules related to the practice of pharmacy in the State of Illinois and the answers marked on this report are true and correct to the best of my knowledge.

PIC NAME: \_\_\_\_\_

LICENSE NUMBER:

PIC SIGNATURE:

DATE: \_\_\_\_\_