GUAM BOARD OF EXAMINERS FOR PHARMACY

Department of Public Health & Social Services
Government of Guam
123 Chalan Kareta, Mangilao, GU 96913

February 20, 2017

GL#34-17-220
Speaker Benjamin J.F. Cruz

FEB 2 0 2017
Time: 3:19 [ ] AM [ ] PM File No.
Received By:

Honorable Règine B. Lee
Legislative Secretary
I Mina'trentai Kuattro Na
Liheslaturan Guåhan
155 Hesler Street
Hagåtña, Guam 96910

RE: **This is a Transmittal to *I Liheslaturan Guåhan* from the Guam Board of Examiners for Pharmacy (GBEP) of Proposed Rules and Regulations Governing Telepharmacy Practice Across Guam/State Lines pursuant to the Administrative Adjudication Law.**

RECEIVED
FEB 20 PM 3:33
KC

Dear Madame Secretary:

Provided with this transmittal in printed copy and electronic copy are:

1. Guam Board of Examiners for Pharmacy (GBEP) Proposed Rules and Regulations Governing Telepharmacy Practice Across Guam/State Lines pursuant to the Administrative Adjudication Law;
2. Draft Bill Approving Rules;
3. Telepharmacy Rules – Final;
4. Exhibit "A" - Notice of Public Hearing;
5. Exhibit "B" - Guam Pharmacy Association (GPhA) Surveys and Comments; and
6. Letter of Approval from Attorney General of Guam.

The GEBP respectfully submits that because the economic impact is projected to be less than $500,000.00, no economic impact statement is required. *See*, 5 GCA § 9301(i)("Exemptions. Any proposed rule, change of rule, regulation or request to impose or raise fees or rates shall be exempted from the requirements of this Act if the annual economic impact to the general public is Five Hundred Thousand Dollars ($500,000.00) or less, as determined by the department, agency, autonomous agency, office or instrumentality proposing the rule.").

Senseramente,

Thomas J. Caruso, BSP
Chair, Guam Board of Examiners for Pharmacy

Office of the People
Senator Régine Biscoe Lee
Legislative Secretary
Date/Time: 2/20/17 @ 12pm
Initials: Aiah, Lin

0220

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Chair, Guam Board of Examiners for Pharmacy

I MINA' TRENTAI KUATTRO NA LIHESLATURAN GUÅHAN
2017(FIRST) Regular Session

Bill No. _____-34

Introduced by: _____

AN ACT TO APPROVE AMENDMENTS TO THE ADMINISTRATIVE RULES AND REGULATIONS FOR THE GUAM BOARD OF EXAMINERS FOR PHARMACY.

BE IT ENACTED BY THE PEOPLE OF GUAM:

Section 1. Approval of Administrative Rules and Regulations. The amendments to the Guam Board of Examiners for Pharmacy's Administrative Rules and Regulations found at Chapter 13 of Title 25, submitted to the Secretary of *I Liheslaturan Guåhan* and attached hereto as Exhibit "A," as provided by Article 6, Chapter 12 of Title 10, Guam Code Annotated; and Article 3, Chapter 9 of Title 5 of the Guam Code Annotated are hereby approved.

Section 2. Severability. If any provision of these rules and regulations or its application to any person or circumstance is found to be invalid or contrary to law, such invalidity shall not affect other provisions or applications to these rules and regulations, and to this end the provisions of these rules and regulations are severable.

EXHIBIT "A"

Amendments to Title 25 GAR Ch. 13

Section 1. Section 13101 of Chapter 13 of Title 25, Guam Administrative Rules and Regulations is amended as follows:

§ 13101. **Authority and Definitions**.

(a) Authority. These rules are adopted pursuant to the Board's authority under the Guam Pharmacy Practice Act.

(b) Definitions. As used in §§ 13101 to 13120:

* * *

(19) *Telepharmacy* means the provision of pharmacist care, by a pharmacist located within the United States, its territories, and the District of Columbia using telecommunications, *remote medication order processing*, or other automations and technologies to deliver care to patients or their agents who are located at sites other than where the pharmacist is located.

(20) *Drug regimen review* means an evaluation of prescription drug orders and patient profile records for:

(1) known allergies;

(2) rational therapy-contraindications;

(3) reasonable dose and route of administration;

(4) reasonable directions for use;

(5) duplication of therapy;

(6) drug-drug interactions;

(7) drug-food interactions;

(8) adverse drug reactions; and

(9) proper utilization, including over-utilization or under-utilization.

(21) *Receiving Pharmacy* means an institutional pharmacy on Guam that has contracted with a remote site to provide pharmacist services after its normal business hours.

(22) *Remote Medication Order Processing* or "*RMOP***"** means the processing of a medication order for an institutional facility by a pharmacist located at a remote site. Remote medication order processing *does not include the dispensing of a drug*, but may include receiving, interpreting, evaluating, clarifying and approval of medication orders. Additionally, remote medication order processing may include order entry, other data entry, performing prospective drug utilization review, interpreting clinical data, performing therapeutic interventions, and providing drug information services, and authorizing release of the medication for administration.

(23) *Remote Medication Order Processing Site* or *Facility* means a site or facility which does not stock, own, or dispense any prescription medications, and whose sole business consists of entry and/or review and/or verification of a prescriber's orders and consulting services under contract for institutional facilities licensed in Guam or any other United States jurisdiction, and which provide services under the direction of a pharmacist in charge ("PIC"), licensed by the Board.

(24) *Remote pharmacist* means any person licensed to practice pharmacy by the Board, either employed or a contract employee of an institutional facility, hospital pharmacy, or remote medication order processing site or facility, processing the medication order from a remote site.

(25) *Remote site* means a site located within the United States, a territory thereof, or District of Columbia that is electronically linked to an institutional facility via a computer and/or other

electronic communications system as defined in the operations, policies and procedures manual of an institutional pharmacy or remote medication order processing site or facility for the purposes of remote medication order processing.

(26) *After-hours Service* means pharmacy coverage by the remote site for all hours not covered by the receiving institutional pharmacy/facility located on Guam.

(27) *Institutional facilities* are limited to hospitals, penal institutions, or long term care facilities as defined in Chap. 12 Article 6, Title 10 Guam Code Annotated.

Section 2. Section 13111 of Chapter 13 of Title 25, Guam Administrative Rules and Regulations is amended to read as follows:

§ 13111. Fees. Repealed (superseded by P.L. 24-207).

Section 3. New Sections 13112 – 13120 shall be added to Chapter 13 of Title 25, Guam Administrative Rules to read as follows:

§ 13112. **Institutional Facility as defined in §13101 (27); Use of Automated Pharmacy System; Policies and Procedures Required.** Any institutional facility that uses an automated pharmacy system shall develop, maintain, and comply with policies and procedures developed in consultation with the pharmacist responsible for pharmacist care for that institutional facility. At a minimum, the policies and procedures shall address the following:

(a) The description and location within the institutional facility of the automated pharmacy system or equipment being used;

(b) The name of the individual or individuals responsible for implementation of and compliance with the policies and procedures;

(c) Medication access and information access procedures;

(d) Security of inventory and confidentiality of records in compliance with state and federal laws, rules, and regulations;

(e) A description of how and by whom the automated pharmacy system is being utilized, including processes for filling, verifying, dispensing, and distributing medications;

(f) Staff education and training;

(g) Quality assurance and quality improvement programs and processes;

(h) Inoperability or emergency downtime procedures;

(i) Periodic system maintenance; and

(j) Medication security and controls.

§ 13113. **Automated Pharmacy System; Requirements; Location.** Automated Pharmacy Systems are subject to the requirements of § 13112.

§ 13114. **Automated Pharmacy System; Requirements; Drugs; Limitations; Inventory; How Treated.**

(a) An automated pharmacy system:

(1) is subject to the requirements of § 13112; and

(2) may be operated in an institutional facility as defined in §13101 for medication administration pursuant to a chart or medication order by a licensed health care professional.

(b) Drugs placed in an automated pharmacy system shall be in the manufacturer's original packaging or in containers repackaged in compliance with Guam and federal laws, rules, and regulations relating to repackaging, labeling, and record keeping.

§ 13115. **Remote Medication Order Processing By a Remote Site; General Requirements**.

(a) A Guam institutional facility may utilize remote medication order processing if the pharmacist performing the remote medication order processing has access to sufficient patient information necessary for prospective drug use review and approval of medication orders.

(b) The pharmacist may be employed or contracted by the entity.

(1) The pharmacist must be a Guam licensed pharmacist.

(2) The entity must have a written agreement or contract with the pharmacist.

(c) The written agreement or contract shall:

(1) Outline the services to be provided.

(2) Delineate the responsibilities of each party (entity) including compliance with federal and Guam laws and regulations governing the practice of pharmacy as well as Guam and federal medical privacy requirements.

(3) Require that the parties (entities) adopt a policies and procedures manual.

(4) Provide that the parties (entities) have access to or share a common electronic file such that the pharmacist performing remote medication order processing has sufficient patient information necessary for prospective drug use review and approval of medication orders.

§ 13116. **Pharmacist Providing Remote Medication Order Processing; Requirements.** A pharmacist providing pharmacist remote medication order processing shall:

(a) be located in a site or facility licensed by the Board;

(b) be located within the United States, a territory thereof, or the District of Columbia;

(c) maintain adequate security and privacy in accordance with state and federal laws, rules, and regulations;

(d) be linked to an institutional facility for which services are provided via computer link, video link, audio link, or facsimile transmission or other electronic devices;

(e) have access to each patient's medical information necessary to perform via computer link, video link, or facsimile transmission or other electronic devices, a prospective drug utilization review as defined in § 13101(20), Drug Regimen Review; and

(f) be employed by or have a contractual agreement to provide such services with the institutional facility where the patient is located.

§ 13117. **Notifications to patients.** An institutional facility that outsources remote medication order processing shall prior to outsourcing their order:

(a) notify patients that remote medication order processing may be outsourced to another site or facility; and

(b) provide the name of that site or facility to the patient. Such notification may be provided through a one-time written notice to the patient.

§ 13118. **Records.** All pharmacies shall maintain appropriate records which identify, by medication order, the name(s), initials, or identification code(s) of each pharmacist and pharmacy

technician who performs a processing function for medication order. Any record generated in this process whether in a hard copy or electronic format shall be maintained for a period required by local and federal law. Such records may be maintained:

(a) separately by each facility/site; or

(b) in a common electronic file as 1ong as the records are maintained in such a manner that the data processing system can produce a printout which lists the functions performed by each pharmacy and pharmacist.

(c) and have the ability to audit the activities of the individuals remotely processing medication orders.

§ 13119. **Patient Privacy.** In the operation of the remote medication order processing site, patient confidentiality and full compliance with HIPAA requirements shall be observed at all times.

§ 13120. **Submission to the Jurisdiction of the Board.** The filing of an application for licensure to practice telepharmacy by any applicant shall constitute the applicant's agreement to submit to the jurisdiction of the Guam Board of Examiners for Pharmacy and to abide by the laws and rules and regulations governing the practice of pharmacy in Guam.

EXHIBIT A

DPHSS continued from page 1

is looking to volunteers to help fill the gaps.

While the DPHSS Health and Professional Licensing Office has a list of nursing volunteers, Gillan said the department is also looking for individuals who would likely maintain their commitment so that DPHSS would not have to draw from its clinics.

"What we're more concerned about is people who can be relied on to show up when they say they're going to show up," he said. "I really don't want to close down any public health activities where our local clients will not get access to services."



Proactive

visit to the Marshalls was seen by a local health care provider, Gillan said no positive indication of the disease has been received from the provider yet.

However, Gillan said no clearances will be required to prove that visiting delegates are Zika free. He said it is difficult to know if someone is infected because about 80 percent of people

use the classifieds whether you're buying or selling

DIVISION OF SPECIAL EDUCATION
www.gdoe.net
500 Mariner Avenue, Barrigada, Guam 96913
Telephone: (671) 300-1322 or 2295 • Email: sped@gdoe.net

Jon J. P. Fernandez
Superintendent of Education

Yolanda S. Gabriel
Assistant Superintendent, Sped

PUBLIC ANNOUNCEMENT

The Department of Education (DOE), through the Division of Special Education, will be submitting the Part C Federal Fiscal Year 2016 Grant Application, under Part C of the Individuals with Disabilities Education Act (IDEA) to the US Department of Education on or before April 21, 2016.Part C – Special Education Grants for Infants/Toddlers & Families: ***$1,487,272***

Pursuant to section 427 of the GEPA and the IDEA Part C Regulations, DOE is publicly disseminating and making available the written policies for at least 60-day period in review. In addition, there will be a 30-day period for public comment as outlined below:

(60) day Public Availability Period: February 08, 2016 – April 07, 2016
(30) day Public Comment Period: March 09, 2016 – April 07, 2016

Beginning February 08, 2016, interested parties may visit Guam Early Intervention System website at www.gdoe.net/geis or www.gdoe.net/special-education under grants and reports Guam Department of Education to download the grant application. Hardcopies of the grant application will also be available for pickup on the above date for the duration of the public availability period at the Division of Special Education Office, Chief Brodie Memorial Elementary School, Room #1 or Guam Early Intervention System, Tiyan Building E, E-1, , from 8 a.m. to 5 p.m., Monday thru Friday, except legal holidays . Grant applications may also be requested in alternate formats. Please contact the GEIS Office for these requests at ph.# 300-5776/5816.

Beginning March 09, 2016 persons interested in providing public comment to the grant applications may submit their comments in writing during the (30) day Public Comment Period to the Assistant Superintendent of Special Education utilizing any of the following methods:

- Hand-delivered comments to the Division of Special Education's Administrative office's address:
  Chief Brodie Memorial Elementary School, Tamuning, Guam
  Room #1 or
  Guam Early Intervention System, Tiyan, Guam
  E-Building Tiyan, E-1
- Email comments to: geis@gdoe.net or,
- Mail comments to: Attn: Assistant Superintendent, Special Education
  Guam Department of Education
  500 Mariner Avenue
  Barrigada, Guam 96913

NOTICE OF PUBLIC HEARING ON PROPOSED AMINISTRATIVE RULES GOVERNING TELEPHARAMACY

The Guam Board of Examiners for Pharmacy (GBEP) will conduct a public hearing to consider Proposed Administrative Rules Governing Telepharmacy on Thursday, March 17, 2016, 7:30 A.M. at the Health Professions Licensure Office (HPLO), 2nd Floor Conference Room, Terlaje Building, Hagåtña, Guam. The public is invited attend.

Copies of the proposed rules are available for inspection at the HPLO in the Terlaje Building, Hagåtña, Guam. The GBEP will be accepting public comments on the proposed rules until close of business March 24, 2016.

For more information call Heather Narcis, GBEP Secretary at (671) 735-7405 through 12. For special accommodations call (671) 735-7172 or (671) 649-1801 for the hearing or speech impaired.

EXHIBIT B

MC/AE
Δ back to RMOP

DRAFT TELEPHARMACY RULES

Proposed Amendments to Title 25 GAR Ch. 13

(Final edit on August 18, 2016)

§ 13101. **Definitions.**

* * *

(19) **Telepharmacy** means the provision of pharmacist care, by a pharmacist located within the United States, its territories, and the District of Columbia using telecommunications, ~~remote order entry~~ processing, or other automations and technologies to deliver care to patients or their agents who are located at sites other than where the pharmacist is located.

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(1) known allergies;
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(21) **Receiving pharmacy** means an institutional pharmacy on Guam that has contracted with a remote site to provide pharmacist services after its normal business hours.

(22) **Remote Order Entry** or **"ROE"** means the processing of a medication order for an institutional facility by a pharmacist located at a remote site. Remote order entry does not include the dispensing of a drug, but may include receiving, interpreting, evaluating, clarifying and approval of medication orders. Additionally, remote order entry may include order entry, other data entry, performing proactive drug utilization review, interpreting clinical data, performing therapeutic interventions, and providing drug information services, and authorizing release of the medication for administration.

(23) **Remote order entry site or facility** means a site or facility which does not stock, own, or dispense any prescription medications, and whose sole business consists of entry and/or review and/or verification of prescriber's orders and consulting services under contract for institutional facilities licensed in Guam or any other United States jurisdiction, and which provide services under the direction of a pharmacist in charge or PIC, licensed by the Board.

(24) **Remote pharmacist** means any person licensed to practice pharmacy by the Board, either employed or a contract employee of an institutional facility, hospital pharmacy, or remote order entry site or facility, processing the medication order from a remote site.

(25) **Remote site** means a site located within the United States, a territory thereof, or District of Columbia that is electronically linked to an institutional facility via a computer and/or other electronic communications system as defined in the operations, policies and procedures manual of an institutional pharmacy or remote order entry site or facility for the purposes of remote order entry.

DRAFT

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(27) **Institutional facility** only includes a nursing home, hospital, penal institution, or long-term care facility.

(28) **Automated Pharmacy System** as defined in the Pharmacy Practice Act. This system is limited to either a single dose or up to a 48-hour emergency supply.

§ 13111. Fees. Repealed (superseded by P.L. 24-207).

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(a) The description and location within the institutional facility of the automated pharmacy system or equipment being used;

(b) The name of the individual or individuals responsible for implementation of and compliance with the policies and procedures;

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(d) Security of inventory and confidentiality of records in compliance with state and federal laws, rules, and regulations;

(e) A description of how and by whom the automated pharmacy system is being utilized, including processes for filling, verifying, dispensing, and distributing medications;

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(2) Delineate the responsibilities of each party (entity) including compliance with federal and Guam laws and regulations governing the practice of pharmacy as well as Guam and federal medical privacy requirements.

(3) Require that the parties (entities) adopt policies and procedures manual.

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(c) maintain adequate security and privacy in accordance with state and federal laws, rules, and regulations;

(d) be linked to an institutional facility for which services are provided via computer link, video link, audio link, or facsimile transmission or other electronic devices;

(e) have access to each patient's medical information necessary to perform via computer link, video link, or facsimile transmission or other electronic devices, a prospective drug utilization review as defined in § 13101(20), Drug Regimen Review;

(f) be employed by or have a contractual agreement to provide such services with the institutional facility where the patient is located.

§ 13117. **Notifications to patients.** An institutional facility that outsources remote order entry shall prior to outsourcing their order entry shall:

(a) notify patients that remote order entry processing may be outsourced to another site/facility; and

(b) provide the name of that site/facility to the patient. Such notification may be provided through a one-time written notice to the patient.

§ 13118. **Records.** All pharmacies shall maintain appropriate records which identify, by medication order, the name(s), initials, or identification code(s) of each pharmacist or pharmacist and pharmacy technician who performs a processing function for medication order. Any record generated in this process whether in a hard copy or electronic format shall be maintained for a period required by local and federal law. Such records may be maintained:

(a) separately by each facility/site; or

(b) in a common electronic file as long as the records are maintained in such a manner that the data processing system can produce a printout which lists the functions performed by each pharmacy and pharmacist.

(c) and have the ability to audit the activities of the individuals remotely processing ~~medication~~ orders.

§ 13119. **Patient Privacy.** In the operation of the remote order entry site, patient confidentiality and full compliance with HIPAA requirements shall be observed at all times.

§ 13120. **Submission to the Jurisdiction of the Board.** The filing of an application for licensure or registration to practice telepharmacy by any applicant shall constitute the applicant's agreement to abide by the laws and rules and regulations governing the practice of pharmacy in Guam and submission to the jurisdiction of the Guam Board of Examiners for Pharmacy.

Re: GPhA Submission of Telepharmacy Draft and non resident pharmacy licensure

Lourdes Phillips <lourdes.phillips64@gmail.com>

Sat 8/13/2016 9:59 AM

To: Angelina Eustaquio <eustaquioam@gmail.com>;

Cc: caruso <jcaruso@guam.net>; Maggie <maggierunner@hotmail.com>; Racquel Sperrazzo <rsperrazzo@gmail.com>; Heather Narcis <Heather.Narcis@dphss.guam.gov>;

Hi Angie,

Thanks for clarifying which resolution you were concerned with. Specifically, are you concerned that telepharmacy should allow technicians to be involved or not be involved? Sorry I'm still unclear.

Secondly, would you like to discuss the institutional definition at the meeting; reason is its probably best to discuss face to face; email gets confusing at times.

Thirdly, I'm still unclear if you want the original drug outlet app or the proposed revised app. Please clarify.

Lastly, I'm good with you representing the board at GPhA without a vote. We will need an alternate should you be in able to attend. We could include it under the agenda announcements.

Everyone - would you please let Heather know what you would like on the agenda and how you think the above issues should be addressed?

Vangie

Sent from my iPhone

On Aug 13, 2016, at 6:06 AM, Angelina Eustaquio <eustaquioam@gmail.com> wrote:

> Hi Vangie,
> My concern with the definitions is that they are inconsistent with the practice act that defines long term care facilities to include mental health, nursing homes, etc. But the definition stated in the draft hints that long term care does not include these facilities. Maybe I'm reading too much into it.
>
> Secondly, it wasn't tele pharmacy resolution I was referring to it was this one:
>
> Resolution No: 112-4-16
>
> Title: Study on Regulations for Pharmacy Technicians to Perform Remote Data Entry
>
> Membership Vote: PASS
>
> **WHEREAS,** the *Model State Pharmacy Act and Model Rules of the National Association of Boards of Pharmacy (Model Act)* supports the provision of pharmacist care outside of a licensed pharmacy in remote locations, such as a home setting, provided that appropriate security and accountability measures are in place; and
>
> **WHEREAS,** some states have promulgated regulations that allow pharmacy technicians to work remotely, such as home settings, to perform data entry functions provided that appropriate controls are in place;

THEREFORE BE IT RESOLVED that NABP conduct a study to examine the emerging practice of allowing pharmacy technicians to perform certain functions remotely, outside of the pharmacy and in home settings, and to recommend, if necessary, amending the *Model Act* to include appropriate registration, training, security, and provisions that ensure public safety.

Also, in response to GPhA's request to have a board member represented, I volunteer to participate. Should I email Mildred myself or is this something we have to discuss as a group and vote on?

Angie

On Aug 12, 2016, at 7:00 PM, Lourdes Phillips <lourdes.phillips64@gmail.com> wrote:

Hi Angie and Board members,

Thank you for your comments. Are you able to clarify your concerns on telepharmacy ROE and institutional definition...I'm sure our Board can work together to include your suggestions at the next meeting.

This is a copy and paste from the NABP website (which you referred to).

Resolution No: 112-5-16

Title: Task Force on Telepharmacy Practice

Membership Vote: PASS

WHEREAS, telehealth is expanding and impacting the definition and regulation of telepharmacy; and

WHEREAS, advanced technologies are improving and also challenging the regulation of the practices of telehealth and telepharmacy; and

WHEREAS, there are telepharmacy practices that are presently operating that may not be known and appropriately regulated by state boards of pharmacy;

THEREFORE BE IT RESOLVED that NABP examine the need for a task force to pursue the development and adoption of licensing processes that protect the public, retain board of pharmacy jurisdiction for such practices, and allow for the development of practice models that are not unnecessarily restricted.

(Resolution passed at the 112th Annual Meeting in San Diego, CA.)

(2) Non-resident pharmacy

I've attached Jerry's response to the nonresident issue below, which we addressed in a different e-mail.

As a Board, we need to vote on whether we are going to use the current application for drug outlet for non-resident pharmacies. Otherwise, we could present the revised app that we've discussed at a working session - we need to vote on the revision.

Keep in mind that our wholesaler/distributor app includes guideline but we have no wholesaler rules/regs. We have a draft that previous board members had worked on.

Let's discuss at the meeting.

Vangie

Hi Heather,

The last comment from our AAG was that these inquires can wait. There's no panic or rush to address each inquiry and we can get to them in due time.
That's my input. Other Board members may certainly comment also.

Jerry

From: Heather Narcis [mailto:Heather.Narcis@dphss.guam.gov]
Sent: Wednesday, August 10, 2016 10:03 AM
To: Angelina Eustaquio; Jerry Caruso; Lourdes Phillips ; Maggie Greenwood ; Racquel Sperrazzo (rsperrazzo@gmail.com); Thomas Caruso
Subject: FW: Non-Resident Pharmacy Licensure

Good Morning All,

Please see below email from Ms. Chesica Hall.

Are we going to have them complete an application or wait for finalization of new fees?

Please advise.

Best Regards,

Heather A. Narcis
Clerk III
Department of Public Health & Social Services
Division of General Management
Health Professional Licensing Office/EMS Office
123 Chalan Kareta
Mangilao, Guam 96913
Tel: (671) 735-7408
Email: heather.narcis@dphss.guam.gov
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From: Marlene M. Carbullido
Sent: Wednesday, August 3, 2016 8:08 AM
To: Heather Narcis <Heather.Narcis@dphss.guam.gov>
Subject: Fw: Non-Resident Pharmacy Licensure

From: Chesica Hall <CHall@PhoenixLawGroup.com>
Sent: Wednesday, August 03, 2016 7:31 AM

To: Marlene M. Carbullido
Subject: Non-Resident Pharmacy Licensure

Good Afternoon,

I am researching licensing requirements for non-resident pharmacies in the US states and territories. Could you confirm for me whether Guam requires a pharmacy located in one of the mainland US states to obtain a license from Guam in order to ship prescriptions into Guam. If the answer is yes, could you please direct me to the applicable forms. I attempted to find materials on the DPHSS website, but did not have much luck.

Thank you in advance.

Best regards,

Chesica Hall

Chesica Gilson Hall, Of Counsel
The Phoenix Law Group, PLC
8765 E. Bell Road, Suite 110
Scottsdale, Arizona 85260
(480) 444-3500 Main
(602) 690-3077 Mobile
(480) 444-1270 Fax
chall@phoenixlawgroup.com
www.phoenixlawgroup.com

Sent from my iPhone

On Aug 12, 2016, at 2:19 PM, Angelina Eustaquio <eustaquioam@gmail.com> wrote:

> Hafa Adai fellow board members,
>
> I apologize for not being able to meet with you in July, but I have attached my comments to the current tele pharmacy draft, as requested, in the attachment below.
> In summary, I had concerns about the institutional pharmacy definition and the change of title to ROE. I've supported my concerns with current definitions in our practice act and the new NABP resolutions that were just passed.
>
> Secondly, I still do not agree with our advisor on how we should address (or not address) the inquiries from off-island pharmacies. To review, since I've been on the board in 2015, we've had the following requests:
> 11/15 - PDL labs (pharmacist)
> 11/15 - Mr. Mcallister (patient)
> 12/15 - Mr Goodhue (pharmacist)
> 2/16 - Jessica Jun (lawyer)
> 2/16 - Sam Magnuson (lawyer)
> 8/16 - Chesica Hall (lawyer)
> I may have missed one or 2. I believe this is an issue we should address sooner than later regardless of a special application since it is clearly stated in 10GCA-12628.
> § 12628. Licensing of Facilities: Licensing.
>
> (a) All Persons, engaging in the Practice of Pharmacy or in the manufacture, production, sale, or distribution of drugs or devices, or pharmacies where drugs or

Doc. No. 34GL-17-0220. CD

devices are dispensed, shall be licensed by the Board of Pharmacy, and shall annually renew their license with the Board. Where operations are conducted at more than one location, each such location shall be licensed by the Board of Pharmacy.

I do believe it's important to move forward and bring our board/regulation of the practice on our island into the modern age. But we should prioritize evaluating whether or not we need to go back and remedy any inconsistencies that have been status quo for decades. The case seems more important when the licensees themselves are coming forward, wanting to be compliant, but we are giving them a letter saying we are not prepared. We should've sent them the application as it stands instead so we have an address, a responsible party, a license number, and a record on file.

Also, the fact that these inquiries are coming from attorneys should raise our eyebrows. Please let us remember that as stated by our AAG, we are the subject matter experts.

Lastly, if we do have an open seat on the board in the future, I believe we should make that known to GPhA so we can open up the floor to any who is interested in serving.

<Final Draft Telepharmacy Rules 072816ae.pdf>

Si yu'os ma'ase,
Angie

On Aug 11, 2016, at 2:26 AM, caruso <jcaruso@guam.net> wrote:

Vangie,

At our Board meeting on July 28th we made many changes to the DRAFT which should have taken care of any concerns of stakeholders comments.
Rob's comments from April are not as much of an issue as they were then.
In addition, at the last meeting attended by GPHA members and Rick Schnitzer, I reassured them that the revised draft would not allow the expansion of telepharmacy to the retail level. I don't think we need to do any more than express that GPHA concerns were taken under advisement and changes to the draft were made reflecting those concerns, or words to that effect.

If any Board members think we need to have a working session to go over the revised draft let me know and we can have one before the next regular meeting.

Jerry

Hafa Adai board,

Just want to include info regarding Rob's recommendation in (3) below, if
you all agree. He says to explain that their (Gpha) concerns are unfounded. How do we state this?

I'd like to finalize the position statement and move on to other drafts we
need to hold a public hearing on, or are we on the right track? Are we on
the same page?

Please advise/give feedback.

Thank you,

Vangie

Sent from my iPhone

> On Apr 30, 2016, at 4:12 PM, Rob Weinberg <rweinberg@guamag.org> wrote:
>
> Three quick comments:
>
> (1) changing the word "means" to "is defined as" is inconsistent with
> how the rest of the definitions are phrased.
>
> (2) There is no such thing as "Guam Licensed Hospital." GovGuam does not
> license hospitals. Hospital may be accredited, e.g., by the Joint
> Commission, or their pharmacy may receive health certificates from Dept.
> of Public Health. I don't know what they think they are intending by
> coining that phrase.
>
> (3) It appears that they are substantively altering the meaning and
> underlying intent of telepharmacy as originally presented and drafted. I
> think the Board is really going to need to take its time addressing
> these comments/suggestions. A written response on the merits from a
> volunteer would be advisable, because it is very likely these
> complaints/suggestions/criticisms will resurface before the Legislature.
> So it is advisable to have a coherent response prepared where you
> explain what it is that your are intending here and why their concerns
> are unfounded and that their proposed solutions miss the mark.
>
> Perhaps you might want to write a statement of findings and intent as
> part of the rules, to explain what these are.
>
> ~Rob

Doc. No. 34GL-17-0220. CD

Robert M. Weinberg
Assistant Attorney General
Office of the Attorney General
590 S. Marine Corps Drive
Suite 706, ITC Building
Tamuning, Guam 96913
(671) 475-3324 ext. 3095
(671) 687-7720 (cell)

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From: Heather Narcis [Heather.Narcis@dphss.guam.gov]
Sent: Saturday, April 30, 2016 11:16 AM
To: Angelina Eustaquio; Lourdes Phillips ; Maggie Greenwood ; Racquel Sperrazzo (rsperrazzo@gmail.com); Thomas Caruso
Cc: Rob Weinberg; rob weinberg
Subject: GPhA Submission of Telepharmacy Draft

Good Morning All,

Please see attached for your review.

Best Regards,

Heather A. Narcis
Clerk III
Department of Public Health & Social Services
Division of General Management
Health Professional Licensing Office/EMS Office
123 Chalan Kareta
Mangilao, Guam 96913
Tel: (671) 735-7408
Email: heather.narcis@dphss.guam.gov
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heather.narcis@dphss.guam.gov

Doc. No. 34GL-17-0220.*CD

Rob Weinberg

From: Rob Weinberg
Sent: Saturday, April 30, 2016 4:12 PM
To: Angelina Eustaquio; Lourdes Phillips ; Maggie Greenwood ; Racquel Sperrazzo (rsperrazzo@gmail.com); Thomas Caruso
Cc: Heather Narcis
Subject: RE: GPhA Submission of Telepharmacy Draft

Three quick comments:

(1) changing the word "means" to "is defined as" is inconsistent with how the rest of the definitions are phrased.

(2) There is no such thing as "Guam Licensed Hospital." GovGuam does not license hospitals. Hospital may be accredited, e.g., by the Joint Commission, or their pharmacy may receive health certificates from Dept. of Public Health. I don't know what they think they are intending by coining that phrase.

(3) It appears that they are substantively altering the meaning and underlying intent of telepharmacy as originally presented and drafted. I think the Board is really going to need to take its time addressing these comments/suggestions. A written response on the merits from a volunteer would be advisable, because it is very likely these complaints/suggestions/criticisms will resurface before the Legislature. So it is advisable to have a coherent response prepared where you explain what it is that your are intending here and why their concerns are unfounded and that their proposed solutions miss the mark.

Perhaps you might want to write a statement of findings and intent as part of the rules, to explain what these are.

~Rob

Robert M. Weinberg
Assistant Attorney General
Office of the Attorney General
590 S. Marine Corps Drive
Suite 706, ITC Building
Tamuning, Guam 96913
(671) 475-3324 ext. 3095
(671) 687-7720 (cell)

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Good Morning All,

Please see attached for your review.

Best Regards,

Heather A. Narcis
Clerk III
Department of Public Health & Social Services
Division of General Management
Health Professional Licensing Office/EMS Office
123 Chalan Kareta
Mangilao, Guam 96913
Tel: (671) 735-7408
Email: heather.narcis@dphss.guam.gov
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DRAFT TELEPHARMACY RULES

Proposed Amendments to Title 25 GAR Ch. 13

(Nov. 19, 2015)

§ 13101. **Definitions.**

* * *

(19) **Telepharmacy** means the provision of pharmacist care, by a pharmacist located within the United States, its territories, and the District of Columbia using telecommunications, remote order entry, or other automations and technologies to deliver care to patients or their agents who are located at sites other than where the pharmacist is located.

(20) **Drug regimen review** means an evaluation of prescription drug orders and patient profile records for:

(1) known allergies;
(2) rational therapy-contraindications;
(3) reasonable dose and route of administration;
(4) reasonable directions for use;
(5) duplication of therapy;
(6) drug-drug interactions;
(7) drug-food interactions;
(8) adverse drug reactions; and
(9) proper utilization, including over-utilization or under-utilization.

(21) **Receiving Pharmacy** means an institutional pharmacy on Guam that has contracted with a remote site to provide pharmacist services after its normal business hours.

(22) **Remote medication order processing** or "**RMOP**" (also known as Remote medication order entry) means the processing of a medication order for an institutional facility by a pharmacist located at a remote site. Remote medication order processing does not include the dispensing of a drug, but may include receiving, interpreting, evaluating, clarifying and approval of medication orders. Additionally, remote medication order processing may include order entry, other data entry, performing prospective drug utilization review, interpreting clinical data, performing therapeutic interventions, and providing drug information services, and authorizing release of the medication for administration.

(23) **Remote medication order processing site or facility** means a site or facility which does not stock, own, or dispense any prescription medications, and whose sole business consists of entry and/or review and/or verification of a prescriber's orders and consulting services under contract for institutional facilities licensed in Guam or any other United States jurisdiction, and which provide services under the direction of a pharmacist in charge or PIC, licensed by the Board.

(24) **Remote pharmacist** means any person licensed to practice pharmacy by the Board, either employed or a contract employee of an institutional facility, hospital pharmacy, or remote medication order processing site or facility, processing the medication order from a remote site.

(25) **Remote site** means a site located ~~within the United States~~ on Guam, a territory thereof, or District of Columbia that is electronically linked to an institutional facility via a computer and/or other electronic communications system as defined in the operations, policies and procedures

define Remote RPh – qualifications

manual of an institutional pharmacy or remote medication order processing site or facility for the purposes of remote medication order processing.

(26) **After-hours Service** means pharmacy coverage by the remote site for all hours not covered by the receiving pharmacy located on Guam.

(27) **Institutional facility** means any child care facility; penal institution; school; hospital; clinic; nursing home; or laboratory as further defined in 10 GCA § 25101.

§ 13111. Fees. Repealed (superseded by P.L. 24-207).

§ 13112. **Hospital, Long-Term Care Facility, or Pharmacy; Use of Automated Medication System; Policies and Procedures Required.** Any hospital, long-term care facility, institutional facility, or pharmacy that uses an automated medication system shall develop, maintain, and comply with policies and procedures developed in consultation with the pharmacist responsible for pharmacist care for that hospital, long-term care facility, or pharmacy. At a minimum, the policies and procedures shall address the following:

(a) The description and location within the hospital, long-term care facility, institutional facility or pharmacy of the automated medication system or equipment being used;

(b) The name of the individual or individuals responsible for implementation of and compliance with the policies and procedures;

(c) Medication access and information access procedures;

(d) Security of inventory and confidentiality of records in compliance with state and federal laws, rules, and regulations;

(e) A description of how and by whom the automated medication system is being utilized, including processes for filling, verifying, dispensing, and distributing medications;

(f) Staff education and training;

(g) Quality assurance and quality improvement programs and processes;

(h) Inoperability or emergency downtime procedures;

(i) Periodic system maintenance; and

(j) Medication security and controls.

§ 13113. **Prescription Medication Distribution Machine; Requirements; Location.** A prescription medication distribution machine:

(a) is subject to the requirements of § 13112; and

(b) may be operated only in a licensed pharmacy where a pharmacist dispenses medications to patients for self-administration pursuant to a prescription.

§ 13114. **Automated Medication Distribution Machine; Requirements; Drugs; Limitations; Inventory; How Treated.**

(a) An automated medication distribution machine:

(1) is subject to the requirements of § 13112; and

(2) may be operated in a hospital, institutional facility, or long-term care facility for medication administration pursuant to a chart order or prescription by a licensed health care professional.

DRAFT

(b) Drugs placed in an automated medication distribution machine shall be in the manufacturer's original packaging or in containers repackaged in compliance with Guam and federal laws, rules, and regulations relating to repackaging, labeling, and record keeping.

§ 13115. **Remote Medication Order Processing By a Remote Site; General Requirements.**

(a) A Guam institutional facility, hospital, long-term care facility, or pharmacy may utilize remote medication order processing if the pharmacist performing the remote medication order processing has access to sufficient patient information necessary for prospective drug use review and approval of medication orders.

(b) The pharmacist may be employed or contracted by the entity.

(1) The pharmacist must be a Guam licensed pharmacist.

(2) The entity must have a written agreement or contract with the pharmacist.

(c) The written agreement or contract shall:

(1) Outline the services to be provided.

(2) Delineate the responsibilities of each party (entity?) including compliance with federal and Guam laws and regulations governing the practice of pharmacy as well as Guam and federal medical privacy requirements.

(3) Require that the parties (entities?) adopt a policies and procedures manual.

(4) Provide that the parties (entities?) have access to or share a common electronic file such that the pharmacist performing remote medication order processing has sufficient patient information necessary for prospective drug use review and approval of medication orders.

§ 13116. **Pharmacist Providing Pharmacist Remote Order Entry; Requirements.** A pharmacist providing pharmacist remote order entry shall:

(a) be located in a site or facility licensed by the Board;

(b) be located within the United States, a territory thereof, or the District of Columbia;

(c) maintain adequate security and privacy in accordance with state and federal laws, rules, and regulations;

(d) be linked to one or more hospitals, long-term care facilities, institutional facility, or pharmacies for which services are provided via computer link, video link, audio link, or facsimile transmission or other electronic devices;

(e) have access to each patient's medical information necessary to perform via computer link, video link, or facsimile transmission or other electronic devices, a prospective drug utilization review as defined in § 13101(20), Drug Regimen Review;

(f) be employed by or have a contractual agreement to provide such services with the hospital, long-term care facility, institutional facility, or pharmacy where the patient is located.

§ 13117. **Notifications to patients.** A pharmacy that outsources off-site prescription order entry to another pharmacy shall prior to outsourcing their prescription:

(a) notify patients that prescription processing may be outsourced to another pharmacy/facility; and

(b) provide the name of that pharmacy to the patient, or if the pharmacy is part of a network of pharmacies under common ownership and any of the network pharmacies may

DRAFT

process the prescription, the patient shall be notified of this fact. Such notification may be provided through a one-time written notice to the patient.

§ 13118. **Records.** All pharmacies shall maintain appropriate records which identify, by prescription drug order, the name(s), initials, or identification code(s) of each pharmacist or pharmacist and pharmacy technician who performs a processing function for a prescription drug order. Any record generated in this process whether in a hard copy or electronic format shall be maintained for a minimum period of five years from the last date of entry. Such records may be maintained:

(a) separately by each pharmacy and pharmacist; or

(b) in a common electronic file as long as the records are maintained in such a manner that the data processing system can produce a printout which lists the functions performed by each pharmacy and pharmacist.

(c) and have the ability to audit the activities of the individuals remotely processing medication orders.

§ 13119. **Patient Privacy.** In the operation of the offsite order entry, patient confidentiality and full compliance with HIPAA requirements shall be observed at all times.

§ 13120. **Submission to the Jurisdiction of the Board.** The filing of an application for licensure or registration to practice telepharmacy by a nonresident pharmacist or pharmacy shall constitute the pharmacist's or pharmacy's agreement to abide by the laws and rules and regulations governing the practice of pharmacy in Guam and submission to the jurisdiction of the Guam Board of Examiners for Pharmacy.

§ 13121. **Contracts, agreements, training, policies and procedures for remote sites.**

(a) An institutional facility may outsource medication order processing to a remote site provided the pharmacies have the same owner; or the institutional facility has entered into a written contract or agreement with an outsourcing company which outlines the services to be provided and the responsibilities and accountabilities of each pharmacy in compliance with federal and state laws and regulations. The pharmacy providing the remote processing of medication orders must be licensed or registered by the Board.

(b) A remote site providing remote medication order processing must insure that all pharmacists providing such services have been trained on each pharmacy's policies and procedures relating to medication order processing. Such training shall include, but not be limited to, policies on abbreviations, administration times, automatic stop orders, substitution, and formulary compliance.

DRAFT

(c) All remote sites involved in remote order processing shall maintain a policy and procedure manual. Each remote site is required to maintain those portions of the policy and procedure manual that relate to that institution's operations. The manual shall:

(1) outline the responsibilities of each remote site and institutional facility or pharmacy;

(2 include a list of the name, address, telephone numbers, and all license/registration numbers of the pharmacists and the facility or site involved in remote order processing; and

(3) include policies and procedures for:

(i) protecting the confidentiality and integrity of patient information;

(ii) maintenance of appropriate records to identify the name(s), initials, or identification code(s) and specific activity(ies) of each pharmacist who performed any processing;

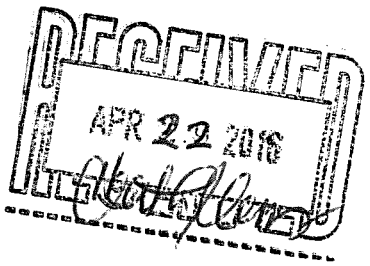
(iii) complying with federal and Guam laws and regulations;

(iv) operating a continuous quality improvement program for pharmacy services designed to objectively and systematically monitor and evaluate the quality and appropriateness of patient care, pursue opportunities to improve patient care, and resolve identified problems; and

(v) annually reviewing the written policies and procedures and documenting such review.

DRAFT

Guam Pharmacists Association
PO Box 26940
Barrigada, Guam 96921



April 18, 2016

To: Guam Board of Pharmacy

Dear Members of the Guam Board of Pharmacy:

The purpose of this letter and the attached "changes" to the "Draft Telepharmacy Rules" (last reviewed and edited by subcommittee on November 19, 2015) is to provide feedback to the board from our Guam pharmacists, owners and other stakeholders in order to address the needs of the applicants and the needs of our citizens and pharmacists.

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Our last line allows the Guam Board Examiners for Pharmacy to reassess a telepharmacy applicant on an annual basis to determine need and impact on the community.

Please let us know of your decision with respect to implementing our requirements on this important issue for our Guam pharmacists.

Respectfully submitted,

Cheryl Marimla
President
Guam Pharmacists Association

Reviewed and Edited by Subcommittee on November 19, 2015
Reviewed and Edited bv Subcornrnittee on November 19,2015

DRAFT TELEPHARMACY REMOTE ORDER ENTRY RULES FOR GUAM HOSPITALS

Proposed Amendments to Title 25 GAR Ch. 13

§ 13101. **Definitions.**

* * *

(19) **Telepharmacy** ~~means~~ is defined as the provision of pharmacist care, by a pharmacist located within the United States, its territories, and the District of Columbia ~~using telecommunications~~, remote order entry, ~~or other automations and technologies~~ to deliver care to patients or their agents who are located at sites other than where the pharmacist is located as a supplement to onsite care in acute care settings

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(1) known allergies;
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(c) Medication access and information access procedures;

(d) Security of inventory and confidentiality of records in compliance with state and federal laws, rules, and regulations;

(e) A description of how and by whom the automated medication system is being utilized, including processes for filling, verifying, dispensing, and distributing medications;

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(c) The written agreement or contract shall:

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(3) Require that the entities a dopt a policies and procedures manual. (4) Provide that the entities have access to or share a common electronic file such that the pharmacis perfo mg remote medication order processing has sufficient patient information necessary or prospective drug use review and approval of medication orders.

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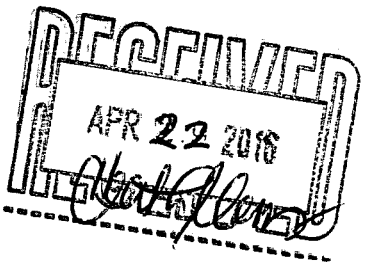
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Guam Pharmacists Association
PO Box 26940
Barrigada, Guam 96921



April 18, 2016

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Guam Pharmacists Association

P.O Box 9520 Tamuning, Guam 96931
gpha671@gmail.com

Mildred Gabriel
President

Kristen Kim
Vice President

Marilyn Tanael
Recording Secretary

Karen Song
Corresponding Secretary

Melissa Gabriel
Treasurer

Amalia Varias
Associate Representative

Una Lee
Sergeant at Arms

August 17, 2016

To: Guam Board of Pharmacy

Re: Meeting on Thursday August 18

Dear Heather:

Members of the Guam Pharmacists Association would like to attend the public portion of the meeting this Thursday August 18 to discuss the telepharmacy draft rules and regulations.

We kindly request that this portion of the agenda be moved upward to the front as most of us have to work by 9 am.

We thank you in advance of your consideration.

Regards

Mildred Gabriel

Mildred Gabriel

President

Reviewed and Edited by Subcommittee on November 19, 2015

4/7/16 comment

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4/7/16 Remove per Mildred per Gary, if kept, add respiratory therapist, etc

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(e) have access to each patient's medical information necessary to perform via computer link, video link, or facsimile transmission or other electronic devices, a prospective drug utilization review as defined in § 13101(20), Drug Regimen Review;

(f) be employed by or have a contractual agreement to provide such services with the hospital, long-term care facility, institutional facility, or pharmacy where the patient is located;

§ 13117. **Notifications to patients.** A pharmacy that outsources off-site prescription order entry to another pharmacy shall prior to outsourcing their prescription:

(a) notify patients that prescription processing may be outsourced to another pharmacy; and

(b) provide the name of that pharmacy to the patient, or if the pharmacy is part of a network of pharmacies under common ownership and any of the network pharmacies may

process the prescription, the patient shall be notified of this fact. Such notification may be provided through a one-time written notice to the patient.

§ 13118. **Records.** All pharmacies shall maintain appropriate records which identify, by prescription drug order, the name(s), initials, or identification code(s) of each pharmacist or pharmacist and pharmacy technician who performs a processing function for a prescription drug order. Any record generated in this process whether in a hard copy or electronic format shall be maintained for a minimum period of five years from the last date of entry. Such records may be maintained:

(a) separately by each pharmacy and pharmacist; or

(b) in a common electronic file as long as the records are maintained in such a manner that the data processing system can produce a printout which lists the functions performed by each pharmacy and pharmacist.

(c) and have the ability to audit the activities of the individuals remotely processing medication orders.

§ 13119. **Patient Privacy.** In the operation of the offsite order entry, patient confidentiality and full compliance with HIPAA requirements shall be observed at all times.

§ 13120. **Submission to the Jurisdiction of the Board.** The filing of an application for licensure or registration to practice telepharmacy by a nonresident pharmacist or pharmacy shall constitute the pharmacist's or pharmacy's agreement to abide by the laws and rules and regulations governing the practice of pharmacy in Guam and submission to the jurisdiction of the Guam Board of Examiners for Pharmacy.

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why?
2.Do you feel telepharmacy can be practiced safely?
3.Do you feel comfortable with the technological aspects of telepharmacy?
4.Is Guam underserved?
5.Is Guam short of pharmacists?
6.Is Guam short of pharmacies?
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)?
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)?
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)?
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)?
11.Have you read the GBEP draft telepharmacy rules?
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens?
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed?
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy?
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?)
16.Should it be limited to 1 remote site per 1 off-site telepharmacy?
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam?
18.Should Board have authority to approve or disapprove application based on location of the remote-site?
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam?
20.How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: _____

_____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy survey

1. Do we need telepharmacy on Guam? Why? No. Telepharmacy works in communities where pharmacy services is not available or difficult to obtained on a continuing basis. Guam does not fall in this category of community .
2. Do you feel telepharmacy can be practiced safely? I don't feel comfortable with this type or practice.
3. Do you feel comfortable with the technological aspects of telepharmacy? The concept is presented and marketed as acceptable to some Boards of Pharmacy when needed in rural areas where the lack of pharmaceutical care is affecting people health care.
4. Is Guam underserved? Guam is not underserved in terms of pharmacy services.
5. Is Guam short of pharmacists? Short of pharmacist is relative. In Guam pharmacist availability is hardly experience since many pharmacist are willing to pull part-time services.
6. Is Guam short of pharmacies? Base on the geographical area of Guam, NO!
7. Should telepharmacy be limited only to hospitals (i.e. GMH, GRMC)? Only if hospitals cannot fulfill the demands of inpatient care by the hospitals pharmacy services.
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? Some criteria and guidelines should be considered in the Rules by by the Board of Pharmacy.
9. Should telepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? Some form "telepharmacy" technology may be acceptable but utilizing the available resources on island.
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? This form of pharmacy practice must be thoroughly researched to examine the impact on the existing health care services now available on Guam: economically and competitively on future health professionals who are preparing to return to Guam to practice their profession
11. Have you read the GBEP draft telepharmacy rules? Yes. There is a need to revisit the rules with more emphasis on the "need" for telepharmacy and not just because it is technologically available.
12. Can telepharmacy provide an increase in accessibility of pharmacy services to our island citizens? No. Guam has adequate availability of pharmacies throughout the island.
13. Should telepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? No.
14. Should telepharmacy be limited to a certain mile radius of an on-site pharmacy?
15. Should GBEP rules limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius? (10miles? 20miles?). Yes.
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? Yes.
17. Should telepharmacy be limited to licensed pharmacists physically in Guam? Yes
18. Should the Board have authority to approve or disapprove application based on location of the remote-site? Yes

19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20. How will telepharmacy impact Guam and its people? Pharmacy services includes the direct one on one contact of the Pharmacist and patient when counseling is done. Most patients expect this type of service from our pharmacist. Also telepharmacy is not a service that is needed on Guam. We have pharmacies practically all over the island. This will discourage many of our aspiring young students from our island interested in pharmacy to change their minds. I feel the economic impact will affect pharmacies now currently operating in our island. Bottom line, telepharmacy is great technology but should be applied only to underserved areas in the U.S. mainland.

Thank you.

Comments/concerns/suggestions: _____

4/7/16

ATTN: Guam Board of Pharmacy
RE: Concerns regarding Telepharmacy / Remote Order Entry by Pharmacist

Here are some things to possibly consider regarding Telepharmacy:

1) Hawaii law has a requirement that in order to allow for telepharmacy to operate in an area, there has to be zero or no established pharmacies in a 5 mile radius for that area. Should Guam have some type of realistic physical boundary as part of the regulation?

2) Just as we need to update our license every 2 years, should some type of yearly renewal assessment be done to hold some accountability for the need of telepharmacy? Or to just simply make sure that requirements are kept (should there be any)? Or for the Board to have some participation via inspection?

3) Should there be a way for pharmacy/hospitals and other areas to preferentially hire local pharmacists first, via job announcements for a certain time period, then if no response is given by that time period, then that establishment may reach out elsewhere via telepharmacy? This maybe done for every new pharmacy job position so as to instill job security for our Guam residents.

These are some of the things to think about and I am sure there are many more concerns. I am thankful for your time in listening to some of my concerns. It is great to embrace the future by building a bridge using technology to advance our pharmacy profession. I am honored to be a part of this history-in-the-making in Guam.

Sincerely,

Margaret Kang, Pharm.D.

4/7/16

ATTN: Guam Board of Pharmacy
RE: Concerns regarding Telepharmacy / Remote Order Entry by Pharmacist

Here are some things to possibly consider regarding Telepharmacy:

1) Hawaii law has a requirement that in order to allow for telepharmacy to operate in an area, there has to be zero or no established pharmacies in a 5 mile radius for that area. Should Guam have some type of realistic physical boundary as part of the regulation?

2) Just as we need to update our license every 2 years, should some type of yearly renewal assessment be done to hold some accountability for the need of telepharmacy? Or to just simply make sure that requirements are kept (should there be any)? Or for the Board to have some participation via inspection?

3) Should there be a way for pharmacy/hospitals and other areas to preferentially hire local pharmacists first, via job announcements for a certain time period, then if no response is given by that time period, then that establishment may reach out elsewhere via telepharmacy? This maybe done for every new pharmacy job position so as to instill job security for our Guam residents.

These are some of the things to think about and I am sure there are many more concerns. I am thankful for your time in listening to some of my concerns. It is great to embrace the future by building a bridge using technology to advance our pharmacy profession. I am honored to be a part of this history-in-the-making in Guam.

Sincerely,

Margaret Kang, Pharm.D.

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? NO, we have enough pharmacy/pharmacist on islo
2. Do you feel telepharmacy can be practiced safely? Maybe
3. Do you feel comfortable with the technological aspects of telepharmacy? NO
4. Is Guam underserved? No
5. Is Guam short of pharmacists? NO
6. Is Guam short of pharmacies? NO
7. Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? ~~No~~ Yes
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? Yes, 200 + patients
9. Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11. Have you read the GBEP draft telepharmacy rules? NO
12. Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? No, we have enough pharmacy. What we need is a 24hrs retail pharmo
13. Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? No,
14. Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? Yes
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) Yes
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? Yes
17. Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? Yes
18. Should Board have authority to approve or disapprove application based on location of the remote-site? Yes
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20. How will telepharmacy impact Guam and its people? It could affect Guam economically, and its people; pharmacist might have less opportunities in here. :)

Comments/concerns/suggestions:
if application is approved; I suggest that we have strict laws to follow.

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? for patient to have access to Rx services ea
2.Do you feel telepharmacy can be practiced safely? Yes w/ after bns
3.Do you feel comfortable with the technological aspects of telepharmacy? Sure w/ strict compli
4.Is Guam underserved? to P & P for patients s
5.Is Guam short of pharmacists? Yes
6.Is Guam short of pharmacies? No
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? No, Retail can exercise/pra
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? Telephon
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? No if a nu
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11.Have you read the GBEP draft telepharmacy rules? No
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? Yes
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? Yes
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? Yes, say 5 - 10 mile radius
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) 5 - 10 mile radius
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? 1:1 is appropriate/reason
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? Yes
18.Should Board have authority to approve or disapprove application based on location of the remote-site? Yes based on rules in place placed/ approved.
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes, subject to review & approv
20.How will telepharmacy impact Guam and its people?
It will improved pts access to Rx care/therapy/pt's compliance to therapy and better outcomes = overall improved QOL

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? No, Not seem to be necessary
2.Do you feel telepharmacy can be practiced safely? Yes (probably Not in Guam)
3.Do you feel comfortable with the technological aspects of telepharmacy? Not really
4.Is Guam underserved? Yes
5.Is Guam short of pharmacists? Yes
6.Is Guam short of pharmacies? NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? Yes
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? Yes
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? Yes
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11.Have you read the GBEP draft telepharmacy rules? NO
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? Yes
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? Sure
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? Yes
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) Yes (10 mile)
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? Sure
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? Yes
18.Should Board have authority to approve or disapprove application based on location of the remote-site? Yes
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes.
20.How will telepharmacy impact Guam and its people? May help out for remote areas

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Please fill out survey, fax back to 649-2724

Thank You!

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? We don't need it.
2. Do you feel telepharmacy can be practiced safely? not safe at all.
3. Do you feel comfortable with the technological aspects of telepharmacy? no.
4. Is Guam underserved? no
5. Is Guam short of pharmacists? no
6. Is Guam short of pharmacies? no
7. Should telepharmacy be limited only to hospitals (i.e. GMH, GRMC)? ~~yes~~ no, not even hospital
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? no
9. Should telepharmacy be limited to Government entities (DOC, DYA, ~~Mental Health~~, ~~DPHSS~~)?
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? well,
11. Have you read the GBEP draft telepharmacy rules? yes
12. Can telepharmacy provide an increase in accessibility of pharmacy services to our island citizens? not really
13. Should telepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? not really.
14. Should telepharmacy be limited to a certain mile radius of an onsite pharmacy?
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?)
16. Should it be limited to 1 remote site per 1 off-site telepharmacy?
17. Should telepharmacy be limited to licensed pharmacists physically in Guam?

No comment

18. Should Board have authority to approve or disapprove application based on location of the remote-site?
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes.
20. How will telepharmacy impact Guam and its people? The need for retail pharmacy will be limited.

Comments/concerns/suggestions: We are not isolate island ~~or~~ / remote no pharmacist wants to come.

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? NO NOT NOW yet maybe in the future...
2. Do you feel telepharmacy can be practiced safely? NO
3. Do you feel comfortable with the technological aspects of telepharmacy? NO
4. Is Guam underserved? NO
5. Is Guam short of pharmacists? Yes
6. Is Guam short of pharmacies? NO
7. Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? NO
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? NO
9. Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11. Have you read the GBEP draft telepharmacy rules? NO
12. Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? NO
13. Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? NO
14. Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? NO
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) NO
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? NO
17. Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? Yes
18. Should Board have authority to approve or disapprove application based on location of the remote-site? YES
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20. How will telepharmacy impact Guam and its people? Let's wait & see...

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? Yes, because our hours are limited
2. Do you feel telepharmacy can be practiced safely? If everyone involved is involved
3. Do you feel comfortable with the technological aspects of telepharmacy? Not really
4. Is Guam underserved? Not Really.
5. Is Guam short of pharmacists? Yes
6. Is Guam short of pharmacies? No
7. Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? No
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? No
9. Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)?
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11. Have you read the GBEP draft telepharmacy rules? Not really
12. Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? Yes
13. Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? Yes
14. Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy?
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) Yes
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? Yes
17. Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? Yes
18. Should Board have authority to approve or disapprove application based on location of the remote-site? Yes
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20. How will telepharmacy impact Guam and its people? I think it would help everyone here on Guam get the medicines they need in a timely matter. They wouldn't have to wait till the pharmacy opened for business

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? Yes, we don't have enough pharmacist on island.
2. Do you feel telepharmacy can be practiced safely? - Probably not.
3. Do you feel comfortable with the technological aspects of telepharmacy? - maybe
4. Is Guam underserved? - Yes
5. Is Guam short of pharmacists? - Yes
6. Is Guam short of pharmacies? - no
7. Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? - No
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? - No
9. Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? - No
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? - Yes,
11. Have you read the GBEP draft telepharmacy rules? - Not Really
12. Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? - Yes
13. Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? - Yes,
14. Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? - Yes
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) 20 miles.
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? - Yes at the beginning
17. Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? - NO
18. Should Board have authority to approve or disapprove application based on location of the remote-site? - No
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? - Yes
20. How will telepharmacy impact Guam and its people? - N/A.

Comments/concerns/suggestions: _____

_____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? no
2.Do you feel telepharmacy can be practiced safely? not sure
3.Do you feel comfortable with the technological aspects of telepharmacy? no
4.Is Guam underserved? no
5.Is Guam short of pharmacists? no
6.Is Guam short of pharmacies? no
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? yes
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? yes 200 beds
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? yes
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? no
11.Have you read the GBEP draft telepharmacy rules? No
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? No
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? yes
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? yes
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) yes
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? yes
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? no
18.Should Board have authority to approve or disapprove application based on location of the remote-site? yes
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? yes
20.How will telepharmacy impact Guam and its people? a lot of pharmacist & technician lost their job

Comments/concerns/suggestions: we dont need telepharmacy here in guam

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? NO, I believe we are not yet ready w this type of remote dispensing
2.Do you feel telepharmacy can be practiced safely? NO
3.Do you feel comfortable with the technological aspects of telepharmacy? NO
4.Is Guam underserved? NO
5.Is Guam short of pharmacists? YES
6.Is Guam short of pharmacies? NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? YES
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? YES
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? YES
11.Have you read the GBEP draft telepharmacy rules? YES
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? NO
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? YES
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? YES
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) YES
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? YES
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? YES
18.Should Board have authority to approve or disapprove application based on location of the remote-site? YES
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? YES
20.How will telepharmacy impact Guam and its people? THE ACCESSABILITY OF MEDICATIONS WILL BE INCREASED BUT THE SAFETY ISSUES MUST BE ADDRESSED AS WELL.

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

001/001
04/02/2016 SAT 8:32 FAX
Doc. No. 34GL-17-0220.*CD
001/001

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? NO
2.Do you feel telepharmacy can be practiced safely? NO
3.Do you feel comfortable with the technological aspects of telepharmacy? NO
4.Is Guam underserved? NO
5.Is Guam short of pharmacists? NO
6.Is Guam short of pharmacies? NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? YES
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? YES
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? YES
11.Have you read the GBEP draft telepharmacy rules? YES
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? NO
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? NO
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? YES
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) YES
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? YES
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? YES
18.Should Board have authority to approve or disapprove application based on location of the remote-site? YES
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? YES
20.How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: LIMIT TELEPHARMACY IN GUAM TO HOSPITALS ONLY

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? NO, Guam have about 45+ pharmacies P population wise, local pharmacies are able to cater patients needs
2.Do you feel telepharmacy can be practiced safely? yes
3.Do you feel comfortable with the technological aspects of telepharmacy? yes
4.Is Guam underserved? NO
5.Is Guam short of pharmacists? NO
6.Is Guam short of pharmacies? NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? YES
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? YES
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? YES
11.Have you read the GBEP draft telepharmacy rules? YES
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? YES
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? yes
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? YES
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? (20miles?))
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? YES
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? YES
18.Should Board have authority to approve or disapprove application based on location of the remote-site? YES
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? YES
20.How will telepharmacy impact Guam and its people? with the current population P local pharmacies heard here are taken cared of. Telepharmacy will eventually implemented P not guidelines decided with Rules P provision that will protect local pharmacies P pharmacist, then most of us will be out of job.

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam? Why? No, We're not underserved.
2.Do you feel telepharmacy can be practiced safely? I have some doubts.
3.Do you feel comfortable with the technological aspects of telepharmacy? Somewhat
4.Is Guam underserved? No
5.Is Guam short of pharmacists? No. Too many pharmacy, yes
6.Is Guam short of pharmacies? No
7.Should telepharmacy be limited only to hospitals (i.e. GMH, GRMC)? Yes
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? 200 plus beds only.
9.Should telepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? Yes
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes. There is no urgent public need.
11.Have you read the GBEP draft telepharmacy rules? not all.
12.Can telepharmacy provide an increase in accessibility of pharmacy services to our island citizens? Maybe?
13.Should telepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? Hospitals, maybe.
14.Should telepharmacy be limited to a certain mile radius of an onsite pharmacy? Yes
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) Ye
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? Yes
17.Should telepharmacy be limited to licensed pharmacists physically in Guam? Yes
18.Should Board have authority to approve or disapprove application based on location of the remote-site? Yes
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes.
20.How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? — no
2. Do you feel telepharmacy can be practiced safely? no
3. Do you feel comfortable with the technological aspects of telepharmacy? no
4. Is Guam underserved? no
5. Is Guam short of pharmacists? yes
6. Is Guam short of pharmacies? no
7. Should telepharmacy be limited only to hospitals (i.e. GMH, GRMC)? yes
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? yes
9. Should telepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? no
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? yes
11. Have you read the GBEP draft telepharmacy rules? — yes
12. Can telepharmacy provide an increase in accessibility of pharmacy services to our island citizens? no
13. Should telepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? no
14. Should telepharmacy be limited to a certain mile radius of an onsite pharmacy? yes
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) yes
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? yes
17. Should telepharmacy be limited to licensed pharmacists physically in Guam? yes
18. Should Board have authority to approve or disapprove application based on location of the remote-site? yes
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? yes
20. How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: Sangkattan Gabriel

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? No
2. Do you feel telepharmacy can be practiced safely? No
3. Do you feel comfortable with the technological aspects of telepharmacy? No
4. Is Guam underserved? No
5. Is Guam short of pharmacists? Yes
6. Is Guam short of pharmacies? No
7. Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? Yes
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? No
9. Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? No
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11. Have you read the GBEP draft telepharmacy rules? Yes
12. Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? No
13. Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? No
14. Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? Yes
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) Yes
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? Yes
17. Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? Yes
18. Should Board have authority to approve or disapprove application based on location of the remote-site? Yes
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20. How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? - NO
2.Do you feel telepharmacy can be practiced safely? - NO
3.Do you feel comfortable with the technological aspects of telepharmacy? - NO
4.Is Guam underserved?- NO
5.Is Guam short of pharmacists? -YES
6.Is Guam short of pharmacies? - NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)?-YES
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? -YES
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? - NO
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? YES
11.Have you read the GBEP draft telepharmacy rules? YES
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? NO
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? - NO
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy?- YES
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) YES
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? YES
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? YES
18.Should Board have authority to approve or disapprove application based on location of the remote-site? YES
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? YES
20.How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? NO
2.Do you feel telepharmacy can be practiced safely? NO
3.Do you feel comfortable with the technological aspects of telepharmacy? NO
4.Is Guam underserved? NO
5.Is Guam short of pharmacists? YES
6.Is Guam short of pharmacies? NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? YES
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? YES
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? YES
11.Have you read the GBEP draft telepharmacy rules? YES
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? NO
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? NO
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? YES
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) YES
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? YES
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? YES
18.Should Board have authority to approve or disapprove application based on location of the remote-site? YES
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? YES
20.How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? NO, BECAUSE WE ARE NOT UNDER-SERVED
2. Do you feel telepharmacy can be practiced safely? NO
3. Do you feel comfortable with the technological aspects of telepharmacy? NO
4. Is Guam underserved? NO
5. Is Guam short of pharmacists? NO
6. Is Guam short of pharmacies? NO
7. Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? YES
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? YES
9. Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? NO
11. Have you read the GBEP draft telepharmacy rules? YES
12. Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? NO
13. Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? NO
14. Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? NO
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) NO
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? NO
17. Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? YES
18. Should Board have authority to approve or disapprove application based on location of the remote-site? YES
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? YES
20. How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: LIMIT TELEPHARMACY TO HOSPITAL

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? NO
2.Do you feel telepharmacy can be practiced safely? Maybe → NO
3.Do you feel comfortable with the technological aspects of telepharmacy? NO
4.Is Guam underserved? ?
5.Is Guam short of pharmacists? YES
6.Is Guam short of pharmacies? NO Maybe
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? N/A
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? NO
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11.Have you read the GBEP draft telepharmacy rules? Yes
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? Not necessarily
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? Maybe
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? NO
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) maybe
16.Should it be limited to 1 remote site per 1 off-site telepharmacy?
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? Maybe
18.Should Board have authority to approve or disapprove application based on location of the remote-site? Sure
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20.How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? No Not on retail pharmacy - Retail pharmacy are accessible to people of Guam
2.Do you feel telepharmacy can be practiced safely?
3.Do you feel comfortable with the technological aspects of telepharmacy? need more research No
4.Is Guam underserved? No
5.Is Guam short of pharmacists? No
6.Is Guam short of pharmacies? No
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? yes
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? yes
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? yes
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? yes
11.Have you read the GBEP draft telepharmacy rules? yes
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? No
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? yes
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? yes
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) yes
16.Should it be limited to 1 remote site per 1 off-site telepharmacy?yes
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? yes
18.Should Board have authority to approve or disapprove application based on location of the remote-site? yes
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? yes
20.How will telepharmacy impact Guam and its people? Guam is only a small - the local pharmacies can provide delivery good quality care to patients in case of patient pharmacist interaction.

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? No, because Guam is NOT underserved
2. Do you feel telepharmacy can be practiced safely? Maybe
3. Do you feel comfortable with the technological aspects of telepharmacy? No
4. Is Guam underserved? No
5. Is Guam short of pharmacists? No
6. Is Guam short of pharmacies? No
7. Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? I don't know (not sure)
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? I don't know
9. Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? Maybe
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11. Have you read the GBEP draft telepharmacy rules? Yes
12. Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? Yes, on Southern part of Guam (UMATAC + MERIZO)
13. Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? Yes
14. Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? Yes
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) Yes
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? Yes
17. Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? Yes
18. Should Board have authority to approve or disapprove application based on location of the remote-site? Yes
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20. How will telepharmacy impact Guam and its people? It will affect local pharmacy business.

Comments/concerns/suggestions: Retail pharmacy can provide all the services Guam is only small island, we don't need Telepharmacy law.

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? No, Not underserved
2. Do you feel telepharmacy can be practiced safely? Yes
3. Do you feel comfortable with the technological aspects of telepharmacy? No
4. Is Guam underserved? Not in Central, Maybe in South
5. Is Guam short of pharmacists? No
6. Is Guam short of pharmacies? Not in Central, Maybe in South
7. Should telepharmacy be limited only to hospitals (i.e. GMH, GRMC)? I don't know
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? I don't know
9. Should telepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPH55)? I don't know
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Transparency + Research time Yes
11. Have you read the GBEP draft telepharmacy rules? No
12. Can telepharmacy provide an increase in accessibility of pharmacy services to our island citizens? In the South Yes, In Central it will saturate and close businesses from overcompetiti
13. Should telepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? Yes
14. Should telepharmacy be limited to a certain mile radius of an onsite pharmacy? Yes
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) Yes
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? I don't know
17. Should telepharmacy be limited to licensed pharmacists physically in Guam? I don't know
18. Should Board have authority to approve or disapprove application based on location of the remote-site? Yes
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20. How will telepharmacy impact Guam and its people? It can help underserved in South

Comments/concerns/suggestions: It will hurt Central + North
It will negate tax revenue for local gov by closing local businesses

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? NO
2. Do you feel telepharmacy can be practiced safely? NO
3. Do you feel comfortable with the technological aspects of telepharmacy? NO
4. Is Guam underserved? NO
5. Is Guam short of pharmacists? NO
6. Is Guam short of pharmacies? NO
7. Should telepharmacy be limited only to hospitals (i.e. GMH, GRMC)? MAYBE
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? NO
9. Should telepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? MAYBE
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? YES
11. Have you read the GBEP draft telepharmacy rules? YES
12. Can telepharmacy provide an increase in accessibility of pharmacy services to our island citizens? NO
13. Should telepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? NO
14. Should telepharmacy be limited to a certain mile radius of an onsite pharmacy? YES
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) YES
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? YES
17. Should telepharmacy be limited to licensed pharmacists physically in Guam? MAYBE
18. Should Board have authority to approve or disapprove application based on location of the remote-site? YES!
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? YES
20. How will telepharmacy impact Guam and its people? —

Comments/concerns/suggestions: Retail pharmacy can provide all the patients needs.

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? No, Because Guam is not underserved
2. Do you feel telepharmacy can be practiced safely? NO
3. Do you feel comfortable with the technological aspects of telepharmacy? No
4. Is Guam underserved? NO
5. Is Guam short of pharmacists? NO
6. Is Guam short of pharmacies? NO
7. Should telepharmacy be limited only to hospitals (i.e. GMH, GRMC)? yes
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? yes
9. Should telepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)?
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? yes
11. Have you read the GBEP draft telepharmacy rules? yes
12. Can telepharmacy provide an increase in accessibility of pharmacy services to our island citizens? No
13. Should telepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? yes
14. Should telepharmacy be limited to a certain mile radius of an onsite pharmacy? yes
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) yes
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? yes
17. Should telepharmacy be limited to licensed pharmacists physically in Guam? yes
18. Should Board have authority to approve or disapprove application based on location of the remote-site? yes
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? yes.
20. How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: It will affect the retail pharmacy in Guam

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? NO, Because Guam is not underserved
2.Do you feel telepharmacy can be practiced safely? NO
3.Do you feel comfortable with the technological aspects of telepharmacy? NO
4.Is Guam underserved? NO
5.Is Guam short of pharmacists? NO
6.Is Guam short of pharmacies? NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? Yes
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? yes
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? maybe
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? yes
11.Have you read the GBEP draft telepharmacy rules? yes
12.*Cantelepharmacy provide an increase in accessibility of pharmacy services to our island* citizens? yes, South part of Guam
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? yes
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? yes
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) yes
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? yes
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? yes
18.Should Board have authority to approve or disapprove application based on location of the remote-site? yes
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? yes
20.How will telepharmacy impact Guam and its people? it affect Local Pharmacy Business in Sinajana & Tamuning area.

Comments/concerns/suggestions: limit Telepharmacy to underserved area in Guam

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

1) Do we need telepharmacy on Guam? Why?

Guam does NOT need telepharmacy as we are NOT underserved. The only reason this is being brought to the board is by a private company, Cardinal under the guise of the new Hospital needing third shift pharmacist for coverage.

The new hospital is NOT recruiting pharmacists for their third shift. The pharamacists currently on Guam are willing to cover on call to assist the hospital

The purspose of this rouge is to take over retail pharmacies on Guam.

If we allow this, there will not be a need for many pharmacists on Guam.

2) Do you feel that telepharmacy can be practices safely on Guam?

When I was Clinic Administrator at FHP, the pharmacy reported to me. We had issues of safe practice WITH the pharmacist present, due to high volume and long hours, so absolutely NO.

3) Do you feel comfortable with the technological aspects of telepharmacy?

I am not experienced in this area and cannot comment.

4) Is Guam underserved?

Absolutely NOT

5) Is Guam short of Pharmacists?

No

6) Is Guam short of Pharmacies?

No

7) Should telepharmacy be limited only to hospitals?

If we must for some reason acquiesce and allow telepharmacy then yes we must limit it to hospital and maybe public health, and limit to one location per hospital and limit to the telepharmacy being located on Guam.

8) Should it be limited to hospitals with certain bed capacities?

Absolutely, there are 5 bed hospitals in USA. any retail operation in the states could open a "specialty hospital". It must be an ACUTE CAREhospital, with ER over 125 beds.

9) Should telepharmacy be limited to Government entities.

No, if we write the proper rules private hospitals should not be discriminated against.

10) So we need more time to adequately research telepharmacy and consider its implications?

Absolutely, there is no reason for the Pharmacy Board to NOT allow the time as they represent the Pharmacists on Guam and we as an organization represent the same stakeholders. There can be no HONEST reason for NOT giving the people who would be most affected buy this major decision time.

11) Have you read the GBEP rules?

Yes and it seems like it was submitted by the new Hospital, written by Cardinal Health, i.e. Cardinal Health attorneys talking to our Assistant AG.

12) Can telepharmacy provide an increase in accessibility of pharmacy services to our island citizens?

NO I am not aware of any Guam citizen NOT being able to get a prescription due to inability to find a pharmacy.

13) Should telepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed?

No who would fill the prescription anyway ?? If an emergency then go to ER

14) Should telepharmacy be limited to a certain mile radius of an onsite pharmacy?

Yes

15) Limit operation of Telepharmacies to areas of no open pharmacies within a certain mile radius?

Yes 10 miles

16) Should it be limited to 1 remote site per off-site telepharmacy.

Absolutely

17) Should telepharmacy be limited to licensed pharmacists physically on Guam.

YES Otherwise we will be invaded by mainland activity. This does, however not preclude the fact that Cardinal would bring some pharmacist here.

18) Should Board have authority to approve or disapprove application based on location of the remote site?

No As a matter of fact I would like to see a referendum voted on by all licensed Pharmacist who are currently physically on Guam to decide this issue, to insure that there are no future conflicts of interest of the Board members. Who better than our own Guam based practicing Pharmacist are more qualified to make this decision....

19) Do you agree pharmacists and other stakeholders should contribute to the formation of good laws and rules that enhance healthcare on Guam?

YES

20) How will telepharmacy impact Guam and its people?

a) It will be the end of retail pharmacy as we know it

b) The personal relationship that our wonderful citizens have with their Pharmacists will disappear.

c) Errors will occur

d) There will be drug interactions and unfortunate health outcomes as a result of this.

In conclusion, the concept of Telepharmacy is a good concept and has its place in our healthcare system, FOR UNDERSERVED AREAS, However when it is used as a bait and switch tactic for a private company to take over retail Pharmacies that will result in the reduction of Pharmacists, this is wrong and is NOT very Guamanian.

Just one old Administrator's comments.

Respectfully submitted,

Rick Schnitzer

Dear GPhA Members,

We would like to encourage everyone to actively participate in another stakeholders' meeting or working session on April 6, at 6:30pm, the venue to be announced.

On this meeting, Dr. Melissa Gabriel of GRMC will conduct an informative presentation about Telepharmacy, and Q&A to follow after presentation.

Kindly submit completed Telepharmacy survey to GPhA by Tuesday, April 5.

Please feel free to contact the following GPhA Officers and Board of Directors for additional information.

Cheryl 632-8100

Karen- 646-6183

Mildred - 646-4827

Jean - 649-9400

Thank you,

GPhA Officers and Board of Directors

Heather Narcis

From: Lourdes Phillips <lourdes.phillips64@gmail.com>
Sent: Saturday, March 26, 2016 4:13 PM
To: SUPERDRUG DEDEDO
Cc: Jerry Caruso; Heather Narcis; Rob Weinberg; Maggie Greenwood; Angie Eustaquio; Marlene M. Carbullido
Subject: Re: GPhA letter - two versions

Hi All,

Thank goodness we have legal counsel to assist us....I understand that other corporations that Rick may or may not be consulting with would also like to provide public comment by the April 7th meeting. I recommended putting their comments in writing and email to Heather.

Vangie

Sent from my iPhone

On Mar 26, 2016, at 3:15 PM, SUPERDRUG DEDEDO <sddededo@paylessmarkets.com> wrote:

> TO ALL:
>
> Thursday I got a visit from Richard "Rick" Schnitzer who is a consultant with a group of pharmacies here on Guam. He came to express concern about the way our proposed Telepharmacy Rules and Regs are written. His thoughts were that the Board was leaving the telepharmacy field open to any and all comers who might want to do business on Guam. He expressed his concern that a large corporation, such as Cardinal, would be able to service all pharmacies and clinics which would put all current pharmacies and pharmacists on Guam out of business!
>
> Knowing this should help us to explain the accurate and true interpretation of the proposed Rules and Regs. I'm sure he is not completely conversant with all the laws, rules and regulations governing the practice of pharmacy on Guam. Knowing this should also help us to explain what is possible or not possible with current and proposed changes in the law.
>
> I hope this explanation helps everyone to understand where he and the Association are coming from.
>
> Jerry
>
> **From:** Lourdes Phillips [mailto:lourdes.phillips64@gmail.com]
> **Sent:** Friday, March 25, 2016 5:50 PM
> **To:** Jerry Caruso
> **Cc:** Heather Narcis; Rob Weinberg; sddededo@paylessmarkets.com; Maggie Greenwood; Angie Eustaquio; Marlene Carbullido
> **Subject:** Re: GPhA letter - two versions
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> Thank you,Jerry.

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> > Please see attached clearer, scanned copies of the documents delivered concerning comments and questions on Telepharmacy Draft.
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> > Clerk III
> > Department of Public Health & Social Services
> > Division of General Management
> > Health Professional Licensing Office/EMS Office
> > 123 Chalan Kareta
> > Mangilao, Guam 96913

> Tel: (671) 735-7408
> Email: heather.narcis@dphss.guam.gov
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Doc. No. 34GL-17-0220.*CD

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Attn: GBEP
from: Ken Lee (SDA)
c/o Karen

Hi Karen,

Please submit for me if you kindly could. Sorry for the trouble and thank you.

Ken

Sent from my iPhone

Hi Ken,
Thank you for your input. Will you forward this to GBEP by March 24th?
Or may we submit (what you wrote below) on your behalf with comments from the other members?
Please advise.

Karen

March 24, 2016

Dear members of the Board,

We would like to thank you for taking the time to consider that inputs of our members and other stakeholders in regards to the draft telepharmacy rules.

When the copy of the draft telepharmacy rules was first given to GPhA on March 5th, several working sessions/meetings were organized.

Those in attendance at these working sessions/meetings asked GPhA to request for an extension to GBEP on their behalf to allow more time to review the draft.

Although not granted, we thank you for your consideration on our request for an extension for public comment on this important telepharmacy rules.

Since our request for extension not granted, we would like to express our concerns on how telepharmacy may impact the practice of pharmacy on Guam and how it may impact our island citizens.

For the time being , we would like to kindly request for the following to be considered when finalizing the telepharmacy rules:

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Item 19 add for "underserved" areas
For every item i.e. 22, 23, 24, 25, 27, 13112, 13112a, 13114a(2), 13115a, 13116d and 13116f to be changed to hospitals
Limit to one remote site per hospital
Approve rules for licensed pharmacists physically in Guam

May we again, request for more time to further discuss the implications that telepharmacy may have on Guam? Thank you for your consideration

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Olivia Delapaz

Kristine Pabuinan

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Geraldine Mariano
MARICAR MATIC
MERLINDA MARIANO
Felisa M. Vitug-Esquivel

March 24, 2016

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	Pharmacist
	Cpht

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REMEDIOS MACATUGAL

Jmacatugal Pharmacy Tech

Fely A. Aghbrit, R Pharmacist

Doris M. Querimit

Doris Querimit, RPL.

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Leonila J. Cambon — Pharmacist

Minerva Termulo — Pharmacy Tech

Evelyn Pili — Pharmacy Tech

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ANEMA L. CARLOS

Anema L. Carlos — Pharmacist

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Marilyn H. Florendo, RPh

Vena C. Ayangac, CPhT

MARY ROSE CANOY, CPhT

Celia P. Navatilan, CPhT

Kristine Kaye Dinalga, CPhT

REY FLORENDO CPhT

WILHELMINO Y. CORDOBA R.PH

Doc. No. 34GL-17-0220.*CD

RECEIVED
MAR 24 2016
BOARDS

March 24, 2016

To: Guam Board of Examiners for Pharmacy

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Taesoo K Lee R.Ph

Youngchoon Park R.Ph Y. Park

Mikk Younguk Jung

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Taesuk Lee R.Ph

Yangchoon Park R.Ph Y. C Park

Mikki Youngjk Jung

ATTN: Guam Board Examiners For Pharmacy

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BY:

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Tania Z. Ramos

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Cheryl Marimla, R.Ph.

Charisma Valencia

Joey Legislador

Mariel Mendoza

Janessa Barrogo

Karen P. Balajadia

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Rene H. Ramos

RICHARD SCHNITZER

CHARMAINE E. ECHON

JOSEPHINE MCDONALD

JANILL RAMOS

WILMA RAMOS

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DAISY B BUDUAN 3/24/16

EARLYNN B. RAGUINDIN

Aubrienne A. Barretto
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Mildred M. Gabriel, R.Ph. _____

Jnalyn G. Jazon, CPhT. _____

Galleno Pablo, CPhT. _____

RECEIVED
MAR 2 4 2016

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	Pharmacist
Marietta D. Penagaje	Pharmacy Technician

GUAM REXALL DRUGS 03/24/2016 12:46 FAX 6716476126 003/003

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EUN-YOUNG KIM. (Pharmacist) 3/24/16

Sarang Kembany 3/24/16

ANNIE O. ARANAS - PHARM TECH 3-24-16

ANGELICA DE OCAMPO 3/24/16

3/24/16

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Mary Ann Armingol

Karen Song

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MARVIR CAMACHO

GINETTE MACATANGAY

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HANISHA HEMLANI

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03/24/2016 12:52 FAX 6716476126 GUAM REXALL DRUGS 001/001

March 24, 2016

To: Guam Board of Examiners for Pharmacy

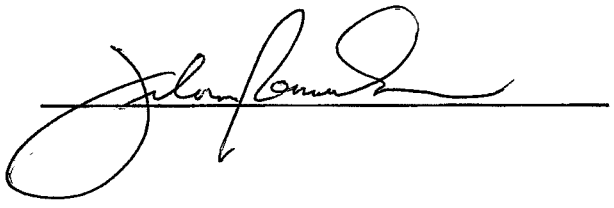
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3. Limit to one remote site per hospital.

Thank you for your consideration on this matter.

Sincerely,

Paul Dalmacio 3-24-16

JOY Mariano 3/24/16

KATHERINE DALMACIO 3/24/16

RECEIVED
MAR 24 2016

March 24, 2016

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Mary-Jane N. Salinsky

Alexis Gonzales

RECEIVED
MAR 24 2016
BOARD

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Mary Elaine Armstrong

Otilia E. Mercado OTILIA E-MERCADO

Karen Song (Tc)

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Jizur Benavente

Veronica Cummings

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KRISTINE S. FELICIANO 3/24/16 KATRINA EDLES 3/24/16

From: Kenneth W. Lee [mailto:klee@adventistclinic.com]
Sent: Thursday, March 17, 2016 6:57 PM
Subject: Re: March 24th deadline draft telepharmacy rules reg

Board Members, GPHA Officers, fellow GPHA members,
I am sorry I have not had a chance to attend any meetings nor look at the draft of the rule. I have only communicated with Karen over email about this impactful topic of telepharmacy.

I would respectfully like to suggest:
Could a similar point as Nevada's demographic rule be input, since it sounds like they are also favoring or protecting the place of live onsite pharmacists and reserving the telepharmacy for underserved areas. And Guam is not underserved like North Dakota and Idaho and Wyoming and these other places with no pharmacy for 50 mile radiuses so in this sense it is not the same need here as in these rural places where they have to drive an hour by interstate to get to civilization.
This is a different type of technology than the automation and other types that serve well in high volume settings or clinically cutting edge settings like university hospitals, it is technology that surfaced to fulfill a need for rural areas that local pharmacies were closing down due to the fact that it was not feasible to fund staff salaries for low volume stores within certain mile radius. And Guam must input this in their rule to isolate telepharmacy to that type of need. Yes, we currently don't have 24 hour service outpatient so if I may reiterate some kind of verbiage in the line of operation of telepharmacy limited to areas of no open pharmacy within certain mile radius (25 mile?)

Sincerely,
Kenneth Lee, PharmD
Seventh-day Adventist Guam Clinic
388 Ypao Rd
Tamuning, GU 96913
ph: 671-648-2525
fax: 671-648-2555

Heather Narcis

From: Roy, Gary <Gary.Roy@GRMC.gu>
Sent: Thursday, March 17, 2016 12:02 PM
To: Heather Narcis
Subject: Todays BOP meeting
Attachments: ROES.docx

Heather,

1. Attached is my statement on Telepharmacy
2. This email is to serve as notification of expansion of GRMC pharmacy hours from 7am-11pm to 24/7 to begin effective when pharmacists are hired and trained
3. I notified the board of a potential diversion of controlled substances, for which a DEA Form 106 was submitted.

Gary Roy R.Ph.
Director of Pharmacy
Guam Regional Medical City
133 Route 3
Dededo GU 96929
Office: (671) 645-5500 ext. 4830

GUAM REGIONAL MEDICAL CITY
Where Patients are Partners

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Guam Regional Medical City &
Cardinal Healthcare
133 Route 3 Dededo, GU 96929
671-969-4830
Gary.Roy@grmc.gu

GUAM REGIONAL MEDICAL CITY

MARCH 17, 2016

Board Members,

I am appearing to make a statement about Telepharmacy on Guam. I represent Cardinal Healthcare and GRMC in supporting the rules of telepharmacy and urge the adoption of said rules. Telepharmacy, of which we would use the Remote Ordered Entry Services (ROES) would benefit the citizens of Guam greatly. I have used ROES for the better part of 10 years in my home state of Maine. I am here to say that ROES made medication management safer, decreased costs, provided timely clinical information, improved patient outcome, improved staff satisfaction, and improved patient & family satisfaction. We were able to show to quantify all these statements through our QI processes. Something we were also able to show is that the ROES pharmacists had less errors than our in house staff, which was unintended. We were able to deduct that this was because of less distractions that the ROES had, as they are solely able to focus on verification and entry of orders from a remote location without distractions. Telepharmacy is everywhere in the United States and continues to grow. It is important for Guam to adopt rules that regulate telepharmacy to allow for institutions, such as GRMC, to utilize these services to make medications management safer. I would urge the Board of Pharmacy to keep moving this along. The Board has been working on this for close to 18 months and hopefully a resolution is in the near future for the people of Guam. I wish to thank the Board for their hard and diligent work in the writing of these rules. If anyone has any questions on telepharmacy, I would be more than glad to answer the questions as someone who looks to use this service now and as someone who has used this service successfully for close to 10 years.

Best regards,

Gary Roy

DIRECTOR OF PHARMACY GRMC

Guam Regional Medical City &
Cardinal Healthcare
133 Route 3 Dededo, GU 96929
671-969-4830
Gary.Roy@grmc.gu

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Best regards,

Gary Roy

DIRECTOR OF PHARMACY GRMC

March 12th (Sat) 0730–~~0830~~ 0900 GMH Boardroom

Karen
Fely
Leonila
Cheryl
Cathy
Tanya
Mildred
Evangeline

- Informed group about March 9th meeting
- Board following due process for applicants (Cardinal & GRMC) for Telepharmacy
- Reminded group that Telepharmacy statute since 1998 but no rules.
- Reviewed proposed Immunizing Pharm Law & DPHSS Immun. Program reporting requirement.

March 7, 2016

Dear Cheryl,

I am faxing the following:

Draft rules for telepharmacy (4 pages)
Draft law for Immunizing pharmacist(5 pages)
Draft law for Sterile pharmaceuticals (6 pages)
Draft rules for Good Compounding Practices (3 pages)
Draft Institutional Pharmacy Rules (11 pages)

Please confirm receipt of all pages via cell phone call or text.

Thanks,

Vangie

March 9th M.

1. Cheryl O. Marimla cheryl.marimla@expressredpharmacy.com / 632-8100
2. Gary Roy gary.roy@grmc.gu / 969-4830
3. Karen Song karenSong67@gmail.com 998-1900
4. PAUL PALMACCIO paul@paylessmarkets.com
5. Marlene O. Borja moborja@teleguam.net
6. Blanche Duenas ba.duenas@gmail.com
7. Daria Oshiro ~~dosh~~ dariano@hawaii.edu
8. Mildred Gabriel mem@guam.net
9. Albert Gurusamy a.gurusamy@hspguam.com
10. Evangeline Phillips (GBEP)

Stakeholders' Working Session
GMHA ~~Classroom~~ Boardroom
Wednesday, March 9, 2016
0700-0800

Topics

1) Introduction by GBEP Rules Committee Chair
2) Draft rules for Telepharmacy – Q&A
3) Draft law for Immunizing Pharmacists – Q&A
4) Draft law for Sterile Pharmaceuticals – Q&A
5) Draft rules for Good Compounding Practices – Q&A
6) Draft Institutional Pharmacy rules – Q&A
7) Conclusion and schedule for next working session

- Reviewed history of Board statute/Rules & challenges.
- Touched on Telepharm. Rules DRAFT

GUAM BOARD OF EXAMINERS FOR PHARMACY

Department of Public Health & Social Services
Government of Guam
P.O. Box 2816
Agana, Guam 96910

Date: March 2, 2016

To: Cheryl Marimla, RPh
President, Guam Pharmacists Association (GPhA)
cheryl.marimla@expressmedpharmacy.com

From: Lourdes Evangeline Phillips, PharmD, CGP
Chairperson, Rules Committee
Guam Board of Examiners for Pharmacy (GBEP)
lourdes.phillips64@gmail.com

Subject:Participation of GPhA members/stakeholders at rules working session

Dear Ms. Marimla,

The GBEP Rules Committee has been working on revising the Guam Pharmacy Practice Act (10 GCA Chapter 12) and on developing rules for amendment to 25 GAR Chapter 13 for the past 18 months. We have these drafts and would like to now share them with members of the GPhA. This is a prelude to a public hearing, which the GBEP will conduct, in accordance with the Guam Administrative Adjudication Law.

A Public Hearing is scheduled at the HPLO Conference room at 0730 on March 17, 2016 concerning the Draft Telepharmacy Rules (as an amendment to 25 GAR Ch. 13). We are requesting a stakeholders' meeting/working session with the GPhA over the next 2 weeks. We understand that this may be short notice so please schedule two separate dates/times if necessary to reach the membership.

Please share this with your other officers, Board of Directors, and members of GPhA and do not hesitate to contact me should you have any questions or concerns.

Respectfully,

Lourdes Evangeline ("Vangie") Phillips, PharmD

cc: Marlene Carbullido, HPLO Acting Director
Heather Narcis, HPLO Clerk
Robert Weinberg, AAG
Thomas J. Caruso, GBEP Acting Chair
Margaret Greenwood, GBEP Acting Secretary
Angelina Eustaquio, GBEP Member

02-15-17
CB

Office of the Attorney General of Guam

590 S. Marine Corps. Dr., Ste. 706, Tamuning, Guam 96913

Elizabeth Barrett-Anderson
Attorney General
Phone: (671) 475-3324
ext. 5015/ 5030
Fax: 477-4703
law@guamag.org

Jacqueline Z. Cruz
Chief of Staff
Administration
ext. 5010
jzcruz@guamag.org

Phillip J. Tydingco
Chief Prosecutor
Prosecution
ext. 2410
ptydingco@guamag.org

Karl P. Espaldon
Deputy AG
Solicitors
ext. 3115
kespaldon@guamag.org

Kenneth D. Orcutt
Deputy AG
Civil Litigation
ext. 3225
korcutt@guamag.org

Fred S. Nishihira
Deputy AG
Consumer Counsel
ext. 3250
fnishihira@guamag.org

Rebecca M. Perez
Deputy AG
Child Support
ext. 1610
rebecca.perez@guamcse.net

Carol M. Hinkle-Sanchez
Deputy AG
Family/Juvenile
ext. 4040
csanchez@guamag.org

Pauline I. Untalan
Administrator
Victim Service Center & Notary Unit
ext. 5030
puntalan@guamag.org

February 7, 2017

RECEIVED
FEB 15 2017
Myra A. Leon Guerrero

Thomas J. Caruso, BHP, Chair
Guam Board of Examiners for Pharmacy
c/o Department of Public Health & Social Services
123 Chalan Kareta
Mangilao, Guam 96913

Subject: Attorney General Approval of Proposed Rules of the Guam Board of Examiners for Pharmacy Governing Telepharmacy Practice Across Guam/State Lines (Ref: DPHSS 17-0053)

Dear Chairman Caruso:

The Office of the Attorney General has completed its review of the proposed Rules of the Guam Board of Examiners for Pharmacy submitted to this office on January 25, 2017.

Pursuant to the Administrative Adjudication Law (AAL), 5 GCA § 9303, I hereby approve the attached version of the proposed Rules as to form and as to compliance with the applicable requirements of the AAL.

Please be advised that the current rule-making procedures require your agency to file the proposed Rules with the Legislative Secretary in a format and manner specified in 5 GCA § 9303(b). Furthermore, no rule shall become effective until after ninety (90) calendar days have elapsed from the date of filing with the Legislative Secretary. Within this 90-day time period, the Legislature may approve, disapprove, or amend these proposed rules.

If you have any questions, please contact Deputy Attorney General of the Solicitor Division Karl P. Espaldon at (671) 475-3324, extension 3115.

Sincerely,

ELIZABETH BARRETT-ANDERSON
Attorney General

Attachment

Doc. No. 34GL-17-0220.*CD

GUAM BOARD OF EXAMINERS FOR PHARMACY

Department of Public Health & Social Services
Government of Guam
123 Chalan Kareta, Mangilao, GU 96913

MEMORANDUM

RECEIVED
FEB 15 2017
Myrna Leon Guan

DATE: January 24, 2017

TO: Attorney General

FROM: Guam Board of Examiners for Pharmacy

RE: Request for Approval of Proposed Rules and Regulations Governing Telepharmacy Practice Across Guam/State Lines

Please find attached the final approved draft of the regulations we have proposed to govern the practice of Telepharmacy Across Guam/State Lines which were approved by the Guam Board of Examiners for Pharmacy ("Board") at its regular meeting held on December 15, 2016. The Board's authority to promulgate these regulations is authorized by 10 GCA § 12616 ("The Guam Board of Examiners for Pharmacy shall make, adopt, amend and repeal such rules as may be deemed necessary by the Board from time to time for the proper administration and enforcement of this Act."); and 10 GCA § 12621 ("Qualifications for Registration to Practice Telepharmacy Across Guam/State Lines").

Introduction

On May 13, 1998, Public Law No. 24-207, *An Act to Repeal and Reenact Article 6, Chapter 12 of Title 10, of The Guam Code Annotated Relative to the Guam Board of Examiners for Pharmacy Practice Act*, was signed into law. Title 10 GCA § 12621 addresses minimum Qualifications for Registration to Practice Telepharmacy Across Guam/State Lines. However, no rules or regulations addressing telepharmacy or the application process had been promulgated.

In November 2014, Cardinal Health Pharmacy Services, LLC asked the Board for an application to practice telepharmacy. As no regulations had ever been promulgated, there were no forms available applicable to telepharmacy. An application for Registration to Practice Telepharmacy was drafted and approved by the Board.

During its research, the Board queried the National Association of Boards of Pharmacy (NABP) regarding telepharmacy and was referred to other state boards for guidance. Several states' rules and regulations were reviewed. In addition, the Board contacted the office of Senator Dennis Rodriguez for guidance. In August 2015, private healthcare providers Cardinal Health Pharmacy Services, LLC and Guam Regional Medical City educated the Board on the scope of practice referred to as Remote Order Entry Services, more commonly known as Remote Medication Order Processing (RMOP). This type of telepharmacy practice reshaped the Board's approach to developing a new set of rules for the practice of telepharmacy on Guam. The Board reviewed numerous rules and regulations from other state boards which resulted in the DRAFT

TELEPHARMACY RULES that were submitted to the Board on November 19, 2015 and which were subsequently submitted for review by the public in March 2016.

Compliance with the Administrative Adjudication Law

Pursuant to 10 GCA § 9301 of the Administrative Adjudication Law, on March 17, 2016 a public hearing was held at the Health Professions Licensing Office (HPLO) in the Terlaje Building in Hagåtña, Guam before the Board on the subject of "Proposed Administrative Rules Governing Telepharmacy." Notice of the public hearing was properly advertised in the Guam Daily Post dated March 7, 2016. *See* attached Exhibit A. Copies of the draft rules were made available to the public at the HPLO.

Prior to the March 17, 2016 public hearing, the Board made a special effort to invite known stakeholders to review the rules in draft form, specifically, the Guam Pharmacists Association (GPhA). The GPhA was invited to review the draft rules and to make whatever suggestions that they thought were applicable. A Board member met with the GPhA on two different occasions to address GPhA member concerns. The Board then held another Public Hearing and invited additional comment during its April 7, 2016 regular board meeting. At that time the GPhA requested an extension to submit their comments and concerns in writing which the Board granted. *See* attached Exhibit B, Surveys and Comments.

At the Board's next regular meeting held on June 16, 2016, the Board Chair addressed a specific concern raised by the GPhA stakeholders pertaining to the proposed rules' effect on retail pharmacy outlets and assured them that the draft specifically excluded any telepharmacy operation as a retail outlet, with a pharmacist at a remote site approving the dispensing of prescriptions by a technician at another site. It is the considered opinion of the Board that at this time Guam is adequately served by its retail pharmacies and therefore the draft rules limit telepharmacy practice to institutional facilities only.

At its regular board meetings on July 28, August 18, September 30, and November 17, the board continued its discussion of the comments received and made minor non-substantive editorial modifications. At its regular board meeting on December 15, 2016 the Board voted to approve the final version of the rules and regulations that are being submitted today. The Board is pleased to report that the attached rules and regulations governing the practice of telepharmacy was a collaborative effort involving all the interested stakeholders.

No economic impact statement is required due to the impact being less than $500,000. *See*, 5 GCA § 9301(i)("Exemptions. Any proposed rule, change of rule, regulation or request to impose or raise fees or rates shall be exempted from the requirements of this Act if the annual economic impact to the general public is Five Hundred Thousand Dollars ($500,000.00) or less, as determined by the department, agency, autonomous agency, office or instrumentality proposing the rule....").

Pursuant to 5 GCA § 9303 of the Administrative Adjudication Law, the Attorney General's review of the proposed rules and regulations as to form is required as part of the rule-making process. The Board respectfully asks that you review these proposed rules and regulations; and in the event you

find them compliant with the law that you so advise so that we may then forward them to the Legislature.

For further information, please free to contact me care of the Board Offices at the Health Professional Licensing Office. On behalf of the Board, I am

Sincerely,

Thomas J. Caruso, BSP
Chair, Guam Board of Examiners for Pharmacy

Attachment

01.30.17 CMT

GUAM BOARD OF EXAMINERS FOR PHARMACY

Department of Public Health & Social Services
Government of Guam
123 Chalan Kareta, Mangilao, GU 96913

January 17, 2017

RECEIVED
FEB 15 2017
mb
myrna tcm Governor

Robert M. Weinberg
Assistant Attorney General
Office of the Attorney General
590 S. Marine Corps Drive
Suite 706, ITC Building
Tamuning, Guam 96913

Enclosed are the following :

1. Cover Memo from Guam Board of Examiners for Pharmacy (GBEP) to the Office of the Attorney General (OAG) regarding Telepharmacy Rules
2. Draft Bill Approving Rules
3. Telepharmacy Rules – Final
4. Exhibit "A" - Notice of Public Hearing
5. Exhibit "B" – Guam Pharmacy Association (GPhA) Surveys and Comments

Should you have further inquiries or require additional information, please do not hesitate to contact me via email at heather.narcis@dphss.guam.gov or at (671) 735-7408.

Respectfully,

Heather Annique A. Narcis
Board Secretary

RECEIVED 1/25/17
OFFICE OF THE ATTORNEY GENERAL
ADMINISTRATION
501701706984

RECEIVED BY:

PRINT NAME

SIGNATURE

1-25-17

DATE

OFFICE OF THE ATTORNEY GENERAL
RECEIVED
Civil / Solicitor
JAN 25 2017
11:47am

I MINA' TRENTAI TRES NA LIHESLATURAN GUÅHAN
2016 (SECOND) Regular Session

Bill No. _____-33

Introduced by: _____

AN ACT TO APPROVE AMENDMENTS TO THE ADMINISTRATIVE RULES AND REGULATIONS FOR THE GUAM BOARD OF EXAMINERS FOR PHARMACY.

BE IT ENACTED BY THE PEOPLE OF GUAM:

Section 1. Approval of Administrative Rules and Regulations. The amendments to the Guam Board of Examiners for Pharmacy's Administrative Rules and Regulations found at Chapter 13 of Title 25, submitted to the Secretary of *I Liheslaturan Guåhan* and attached hereto as Exhibit "A," as provided by Article 6, Chapter 12 of Title 10, Guam Code Annotated; and Article 3, Chapter 9 of Title 5 of the Guam Code Annotated are hereby approved.

Section 2. Severability. If any provision of these rules and regulations or its application to any person or circumstance is found to be invalid or contrary to law, such invalidity shall not affect other provisions or applications to these rules and regulations, and to this end the provisions of these rules and regulations are severable.

EXHIBIT "A"

Amendments to Title 25 GAR Ch. 13

Section 1. Section 13101 of Chapter 13 of Title 25, Guam Administrative Rules and Regulations is amended as follows:

§ 13101. **Authority and Definitions**.

(a) Authority. These rules are adopted pursuant to the Board's authority under the Guam Pharmacy Practice Act.

(b) Definitions. As used in §§ 13101 to 13120:

* * *

(19) *Telepharmacy* means the provision of pharmacist care, by a pharmacist located within the United States, its territories, and the District of Columbia using telecommunications, *remote medication order processing*, or other automations and technologies to deliver care to patients or their agents who are located at sites other than where the pharmacist is located.

(20) *Drug regimen review* means an evaluation of prescription drug orders and patient profile records for:

(1) known allergies;

(2) rational therapy-contraindications;

(3) reasonable dose and route of administration;

(4) reasonable directions for use;

(5) duplication of therapy;

(6) drug-drug interactions;

(7) drug-food interactions;

(8) adverse drug reactions; and

(9) proper utilization, including over-utilization or under-utilization.

(21) *Receiving Pharmacy* means an institutional pharmacy on Guam that has contracted with a remote site to provide pharmacist services after its normal business hours.

(22) *Remote Medication Order Processing* or "*RMOP*" means the processing of a medication order for an institutional facility by a pharmacist located at a remote site. Remote medication order processing *does not include the dispensing of a drug*, but may include receiving, interpreting, evaluating, clarifying and approval of medication orders. Additionally, remote medication order processing may include order entry, other data entry, performing prospective drug utilization review, interpreting clinical data, performing therapeutic interventions, and providing drug information services, and authorizing release of the medication for administration.

(23) *Remote Medication Order Processing Site* or *Facility* means a site or facility which does not stock, own, or dispense any prescription medications, and whose sole business consists of entry and/or review and/or verification of a prescriber's orders and consulting services under contract for institutional facilities licensed in Guam or any other United States jurisdiction, and which provide services under the direction of a pharmacist in charge ("PIC"), licensed by the Board.

(24) *Remote pharmacist* means any person licensed to practice pharmacy by the Board, either employed or a contract employee of an institutional facility, hospital pharmacy, or remote medication order processing site or facility, processing the medication order from a remote site.

(25) *Remote site* means a site located within the United States, a territory thereof, or District of Columbia that is electronically linked to an institutional facility via a computer and/or other

electronic communications system as defined in the operations, policies and procedures manual of an institutional pharmacy or remote medication order processing site or facility for the purposes of remote medication order processing.

(26) *After-hours Service* means pharmacy coverage by the remote site for all hours not covered by the receiving institutional pharmacy/facility located on Guam.

(27) *Institutional facilities* are limited to hospitals, penal institutions, or long term care facilities as defined in Chap. 12 Article 6, Title 10 Guam Code Annotated.

Section 2. Section 13111 of Chapter 13 of Title 25, Guam Administrative Rules and Regulations is amended to read as follows:

§ 13111. Fees. Repealed (superseded by P.L. 24-207).

Section 3. New Sections 13112 – 13120 shall be added to Chapter 13 of Title 25, Guam Administrative Rules to read as follows:

§ 13112. **Institutional Facility as defined in §13101 (27); Use of Automated Pharmacy System; Policies and Procedures Required.** Any institutional facility that uses an automated pharmacy system shall develop, maintain, and comply with policies and procedures developed in consultation with the pharmacist responsible for pharmacist care for that institutional facility. At a minimum, the policies and procedures shall address the following:

(a) The description and location within the institutional facility of the automated pharmacy system or equipment being used;

(b) The name of the individual or individuals responsible for implementation of and compliance with the policies and procedures;

(c) Medication access and information access procedures;

(d) Security of inventory and confidentiality of records in compliance with state and federal laws, rules, and regulations;

(e) A description of how and by whom the automated pharmacy system is being utilized, including processes for filling, verifying, dispensing, and distributing medications;

(f) Staff education and training;

(g) Quality assurance and quality improvement programs and processes;

(h) Inoperability or emergency downtime procedures;

(i) Periodic system maintenance; and

(j) Medication security and controls.

§ 13113. **Automated Pharmacy System; Requirements; Location.** Automated Pharmacy Systems are subject to the requirements of § 13112.

§ 13114. **Automated Pharmacy System; Requirements; Drugs; Limitations; Inventory; How Treated.**

(a) An automated pharmacy system:

(1) is subject to the requirements of § 13112; and

(2) may be operated in an institutional facility as defined in §13101 for medication administration pursuant to a chart or medication order by a licensed health care professional.

(b) Drugs placed in an automated pharmacy system shall be in the manufacturer's original packaging or in containers repackaged in compliance with Guam and federal laws, rules, and regulations relating to repackaging, labeling, and record keeping.

§ 13115. **Remote Medication Order Processing By a Remote Site; General Requirements.**

(a) A Guam institutional facility may utilize remote medication order processing if the pharmacist performing the remote medication order processing has access to sufficient patient information necessary for prospective drug use review and approval of medication orders.

(b) The pharmacist may be employed or contracted by the entity.

(1) The pharmacist must be a Guam licensed pharmacist.

(2) The entity must have a written agreement or contract with the pharmacist.

(c) The written agreement or contract shall:

(1) Outline the services to be provided.

(2) Delineate the responsibilities of each party (entity) including compliance with federal and Guam laws and regulations governing the practice of pharmacy as well as Guam and federal medical privacy requirements.

(3) Require that the parties (entities) adopt a policies and procedures manual.

(4) Provide that the parties (entities) have access to or share a common electronic file such that the pharmacist performing remote medication order processing has sufficient patient information necessary for prospective drug use review and approval of medication orders.

§ 13116. **Pharmacist Providing Remote Medication Order Processing; Requirements.** A pharmacist providing pharmacist remote medication order processing shall:

(a) be located in a site or facility licensed by the Board;

(b) be located within the United States, a territory thereof, or the District of Columbia;

(c) maintain adequate security and privacy in accordance with state and federal laws, rules, and regulations;

(d) be linked to an institutional facility for which services are provided via computer link, video link, audio link, or facsimile transmission or other electronic devices;

(e) have access to each patient's medical information necessary to perform via computer link, video link, or facsimile transmission or other electronic devices, a prospective drug utilization review as defined in § 13101(20), Drug Regimen Review; and

(f) be employed by or have a contractual agreement to provide such services with the institutional facility where the patient is located.

§ 13117. **Notifications to patients.** An institutional facility that outsources remote medication order processing shall prior to outsourcing their order:

(a) notify patients that remote medication order processing may be outsourced to another site or facility; and

(b) provide the name of that site or facility to the patient. Such notification may be provided through a one-time written notice to the patient.

§ 13118. **Records.** All pharmacies shall maintain appropriate records which identify, by medication order, the name(s), initials, or identification code(s) of each pharmacist and pharmacy

technician who performs a processing function for medication order. Any record generated in this process whether in a hard copy or electronic format shall be maintained for a period required by local and federal law. Such records may be maintained:

(a) separately by each facility/site; or

(b) in a common electronic file as long as the records are maintained in such a manner that the data processing system can produce a printout which lists the functions performed by each pharmacy and pharmacist.

(c) and have the ability to audit the activities of the individuals remotely processing medication orders.

§ 13119. **Patient Privacy.** In the operation of the remote medication order processing site, patient confidentiality and full compliance with HIPAA requirements shall be observed at all times.

§ 13120. **Submission to the Jurisdiction of the Board.** The filing of an application for licensure to practice telepharmacy by any applicant shall constitute the applicant's agreement to submit to the jurisdiction of the Guam Board of Examiners for Pharmacy and to abide by the laws and rules and regulations governing the practice of pharmacy in Guam.

EXHIBIT A

DPHSS continued from page 1

is looking to volunteers to help fill the gaps.

While the DPHSS Health and Professional Licensing Office has a list of nursing volunteers, Gillan said the department is also looking for individuals who would likely maintain their commitment so that DPHSS would not have to draw from its clinics.

"What we're more concerned about is people who can be relied on to show up when they say they're going to show up," he said. "I really don't want to close down any public health activities where our local clients will not get access to services."

Proactive



visit to the Marshalls was seen by a local healthcare provider. Gillan said no positive indication of the disease has been received from the provider yet.

However, Gillan said no clearances will be required to prove that visiting delegates are Zika free. He said it is difficult to know if someone is infected because about 80 percent of people

www.gdoe.net
500 Mariner Avenue, Barrigada, Guam 96913
Telephone: (671) 300-1322 or 2295 • Email: sped@gdoe.net

Jon J. P. Fernandez
Superintendent of Education

Yolanda S. Gabriel
Assistant Superintendent, Sped

PUBLIC ANNOUNCEMENT

The Department of Education (DOE), through the Division of Special Education, will be submitting the Part C Federal Fiscal Year 2016 Grant Application, under Part C of the Individuals with Disabilities Education Act (IDEA) to the US Department of Education on or before April 21, 2016.Part C – Special Education Grants for Infants/Toddlers & Families: ***$1,487,272***

Pursuant to section 427 of the GEPA and the IDEA Part C Regulations, DOE is publicly disseminating and making available the written policies for at least 60-day period in review. In addition, there will be a 30-day period for public comment as outlined below:

(60) day Public Availability Period: February 08, 2016 – April 07, 2016
(30) day Public Comment Period: March 09, 2016 – April 07, 2016

Beginning February 08, 2016, interested parties may visit Guam Early Intervention System website at www.gdoe.net/geis or www.gdoe.net/special-education under grants and reports Guam Department of Education to download the grant application. Hardcopies of the grant application will also be available for pickup on the above date for the duration of the public availability period at the Division of Special Education Office, Chief Brodie Memorial Elementary School, Room #1 or Guam Early Intervention System, Tiyan Building E, E-1, from 8 a.m. to 5 p.m., Monday thru Friday, except legal holidays. Grant applications may also be requested in alternate formats. Please contact the GEIS Office for these requests at ph.#.300-5776/5816.

Beginning March 09, 2016 persons interested in providing public comment to the grant applications may submit their comments in writing during the (30) day Public Comment Period to the Assistant Superintendent of Special Education utilizing any of the following methods:

- Hand-delivered comments to the Division of Special Education's Administrative office's address:
  Chief Brodie Memorial Elementary School, Tamuning, Guam
  Room #1 or
  Guam Early Intervention System, Tiyan, Guam
  E-Building, Tiyan, E-1
- Email comments to: geis@gdoe.net or
- Mail comments to: Attn: Assistant Superintendent, Special Education
  Guam Department of Education
  500 Mariner Avenue
  Barrigada, Guam 96913

use the classifieds whether you're buying or selling

NOTICE OF PUBLIC HEARING ON PROPOSED ADMINISTRATIVE RULES GOVERNING TELEPHARAMACY

The Guam Board of Examiners for Pharmacy (GBEP) will conduct a public hearing to consider Proposed Administrative Rules Governing Telepharmacy on Thursday, March 17, 2016, 7:30 A.M. at the Health Professions Licensure Office (HPLO), 2nd Floor Conference Room, Terlaje Building, Hagåtña, Guam. The public is invited attend.

Copies of the proposed rules are available for inspection at the HPLO in the Terlaje Building, Hagåtña, Guam. The GBEP will be accepting public comments on the proposed rules until close of business March 24, 2016.

For more information call Heather Narris, GBEP Secretary at (671) 735-7405 through 12. For special accommodations call (671) 735-7172 or (671) 649-1801 for the hearing or speech impaired.

EXHIBIT B

MG/AE
Δ back to RMOP

DRAFT TELEPHARMACY RULES

Proposed Amendments to Title 25 GAR Ch. 13

(Final edit on August 18, 2016)

§ 13101. **Definitions.**

* * *

(19) **Telepharmacy** means the provision of pharmacist care, by a pharmacist located within the United States, its territories, and the District of Columbia using telecommunications, ~~remote order entry~~ processing, or other automations and technologies to deliver care to patients or their agents who are located at sites other than where the pharmacist is located.

medication (20) **Drug regimen review** means an evaluation of prescription drug orders and patient profile records for:

(1) known allergies;
(2) rational therapy-contraindications;
(3) reasonable dose and route of administration;
(4) reasonable directions for use;
(5) duplication of therapy;
(6) drug-drug interactions;
(7) drug-food interactions;
(8) adverse drug reactions; and
(9) proper utilization, including over-utilization or under-utilization.

(21) **Receiving pharmacy** means an institutional pharmacy on Guam that has contracted with a remote site to provide pharmacist services after its normal business hours.

(22) **Remote Order Entry** or **"ROE"** means the processing of a medication order for an institutional facility by a pharmacist located at a remote site. Remote order entry does not include the dispensing of a drug, but may include receiving, interpreting, evaluating, clarifying and approving medication orders. Additionally, remote order entry may include order entry, other data entry, performing prospective drug utilization review, interpreting clinical data, performing therapeutic interventions, and providing drug information services, and authorizing release of the medication for administration.

(23) **Remote order entry site or facility** means a site or facility which does not stock, own, or dispense any prescription medications, and whose sole business consists of entry and/or review and/or verification of prescriber's orders and consulting services under contract for institutional facilities licensed in Guam or any other United States jurisdiction, and which provide services under the direction of a pharmacist in charge or PIC, licensed by the Board.

(24) **Remote pharmacist** means any person licensed to practice pharmacy by the Board, either employed or a contract employee of an institutional facility, hospital pharmacy, or remote order entry site or facility, processing the medication order from a remote site.

(25) **Remote site** means a site located within the United States, a territory thereof, or District of Columbia that is electronically linked to an institutional facility via a computer and/or other electronic communications system as defined in the operations, policies and procedures manual of an institutional pharmacy or remote order entry site or facility for the purposes of remote order entry.

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(26) **After-hours Service** means pharmacy coverage by the remote site for all hours not covered by the receiving institutional pharmacy/facility located on Guam.

(27) **Institutional facility** only includes a nursing home, hospital, penal institution, or long-term care facility.

(28) **Automated Pharmacy System** as defined in the Pharmacy Practice Act. This system is limited to either a single dose or up to a 48-hour emergency supply.

§ 13111. Fees. Repealed (superseded by P.L. 24-207).

§ 13112. **Institutional Facility as defined in §13101 (27); Use of Automated Pharmacy System; Policies and Procedures Required.** An institutional facility that uses an automated pharmacy system shall develop, maintain, and comply with policies and procedures developed in consultation with the pharmacist responsible for pharmacist care for that institutional facility. At a minimum, the policies and procedures shall address the following:

(a) The description and location within the institutional facility of the automated pharmacy system or equipment being used;

(b) The name of the individual or individuals responsible for implementation of and compliance with the policies and procedures;

(c) Medication access and information access procedures;

(d) Security of inventory and confidentiality of records in compliance with state and federal laws, rules, and regulations;

(e) A description of how and by whom the automated pharmacy system is being utilized, including processes for filling, verifying, dispensing, and distributing medications;

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(g) Quality assurance and quality improvement programs and processes;

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§ 13114. **Automated Pharmacy System; Requirements; Drugs; Limitations; Inventory; How Treated.**

(a) An automated pharmacy system:

(1) is subject to the requirements of § 13112; and

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DRAFT

§ 13115. **Remote Order Entry By a Remote Site; General Requirements.**

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(3) Require that the parties (entities) adopt policies and procedures manual.

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(d) be linked to an institutional facility for which services are provided via computer link, video link, audio link, facsimile transmission or other electronic devices;

(e) have access to each patient's medical information necessary to perform via computer link, video link, or facsimile transmission or other electronic devices, a prospective drug utilization review as defined in § 3101(26), Drug Regimen Review;

(f) be employed by or have a contractual agreement to provide such services with the institutional facility where the patient is located.

§ 13117. **Notifications to patients.** An institutional facility that outsources remote order entry shall prior to outsourcing its order entry shall:

(a) notify patients that remote order entry processing may be outsourced to another site/facility; and

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(Final edit on August 18, 2016)

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Re: GPhA Submission of Telepharmacy Draft and non resident pharmacy licensure

Lourdes Phillips <lourdes.phillips64@gmail.com>

Sat 8/13/2016 9:59 AM

To: Angelina Eustaquio <eustaquioam@gmail.com>;

Cc: caruso <jcaruso@guam.net>; Maggie <maggierunner@hotmail.com>; Racquel Sperrazzo <rsperrazzo@gmail.com>; Heather Narcis <Heather.Narcis@dphss.guam.gov>;

Hi Angie,

Thanks for clarifying which resolution you were concerned with. Specifically, are you concerned that telepharmacy should allow technicians to be involved or not be involved? Sorry I'm still unclear.

Secondly, would you like to discuss the institutional definition at the meeting; reason is its probably best to discuss face to face; email gets confusing at times.

Thirdly, I'm still unclear if you want the original drug outlet app or the proposed revised app. Please clarify.

Lastly, I'm good with you representing the board at GPhA without a vote. We will need an alternate should you be in able to attend. We could include it under the agenda announcements.

Everyone - would you please let Heather know what you would like on the agenda and how you think the above issues should be addressed?

Vangie

Sent from my iPhone

On Aug 13, 2016, at 6:06 AM, Angelina Eustaquio <eustaquioam@gmail.com> wrote:

> Hi Vangie,
> My concern with the definitions is that they are inconsistent with the practice act that defines long term care facilities to include mental health, nursing homes, etc. But the definition stated in the draft hints that long term care does not include these facilities. Maybe I'm reading too much into it.
>
> Secondly, it wasn't tele pharmacy resolution I was referring to it was this one:
> **Resolution No: 112-4-16**
>
> **Title: Study on Regulations for Pharmacy Technicians to Perform Remote Data Entry**
>
> **Membership Vote: PASS**
>
> **WHEREAS,** the *Model State Pharmacy Act and Model Rules of the National Association of Boards of Pharmacy (Model Act)* supports the provision of pharmacist care outside of a licensed pharmacy in remote locations, such as a home setting, provided that appropriate security and accountability measures are in place; and
>
> **WHEREAS,** some states have promulgated regulations that allow pharmacy technicians to work remotely, such as home settings, to perform data entry functions provided that appropriate controls are in place;

THEREFORE BE IT RESOLVED that NABP conduct a study to examine the emerging practice of allowing pharmacy technicians to perform certain functions remotely, outside of the pharmacy and in home settings, and to recommend, if necessary, amending the *Model Act* to include appropriate registration, training, security, and provisions that ensure public safety.

Also, in response to GPhA's request to have a board member represented, I volunteer to participate. Should I email Mildred myself or is this something we have to discuss as a group and vote on?

Angie

On Aug 12, 2016, at 7:00 PM, Lourdes Phillips <lourdes.phillips64@gmail.com> wrote:

Hi Angie and Board members,

Thank you for your comments. Are you able to clarify your concerns on telepharmacy ROE and institutional definition...I'm sure our Board can work together to include your suggestions at the next meeting.

This is a copy and paste from the NABP website (which you referred to).

Resolution No: 112-5-16

Title: Task Force on Telepharmacy Practice

Membership Vote: PASS

WHEREAS, telehealth is expanding and impacting the definition and regulation of telepharmacy; and

WHEREAS, advanced technologies are improving and also challenging the regulation of the practices of telehealth and telepharmacy; and

WHEREAS, there are telepharmacy practices that are presently operating that may not be known and appropriately regulated by state boards of pharmacy;

THEREFORE BE IT RESOLVED that NABP examine the need for a task force to pursue the development and adoption of licensing processes that protect the public, retain board of pharmacy jurisdiction for such practices, and allow for the development of practice models that are not unnecessarily restricted.

(Resolution passed at the 112th Annual Meeting in San Diego, CA.)

(2) Non-resident pharmacy

I've attached Jerry's response to the nonresident issue below, which we addressed in a different e-mail.

As a Board, we need to vote on whether we are going to use the current application for drug outlet for non-resident pharmacies. Otherwise, we could present the revised app that we've discussed at a working session - we need to vote on the revision.

Keep in mind that our wholesaler/distributor app includes guideline but we have no wholesaler rules/regs. We have a draft that previous board members had worked on.

Let's discuss at the meeting.

Vangie

Hi Heather,

The last comment from our AAG was that these inquires can wait. There's no panic or rush to address each inquiry and we can get to them in due time.
That's my input. Other Board members may certainly comment also.

Jerry

From: Heather Narcis [mailto:Heather.Narcis@dphss.guam.gov]
Sent: Wednesday, August 10, 2016 10:03 AM
To: Angelina Eustaquio; Jerry Caruso; Lourdes Phillips ; Maggie Greenwood ; Racquel Sperrazzo (rsperrazzo@gmail.com); Thomas Caruso
Subject: FW: Non-Resident Pharmacy Licensure

Good Morning All,

Please see below email from Ms. Chesica Hall.

Are we going to have them complete an application or wait for finalization of new fees?

Please advise.

Best Regards,

Heather A. Narcis
Clerk III
Department of Public Health & Social Services
Division of General Management
Health Professional Licensing Office/EMS Office
123 Chalan Kareta
Mangilao, Guam 96913
Tel: (671) 735-7408
Email: heather.narcis@dphss.guam.gov
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From: Marlene M. Carbullido
Sent: Wednesday, August 3, 2016 8:08 AM
To: Heather Narcis <Heather.Narcis@dphss.guam.gov>
Subject: Fw: Non-Resident Pharmacy Licensure

From: Chesica Hall <CHall@PhoenixLawGroup.com>
Sent: Wednesday, August 03, 2016 7:31 AM

To: Marlene M. Carbullido
Subject: Non-Resident Pharmacy Licensure

Good Afternoon,

I am researching licensing requirements for non-resident pharmacies in the US states and territories. Could you confirm for me whether Guam requires a pharmacy located in one of the mainland US states to obtain a license from Guam in order to ship prescriptions into Guam. If the answer is yes, could you please direct me to the applicable forms. I attempted to find materials on the DPHSS website, but did not have much luck.

Thank you in advance.

Best regards,

Chesica Hall

Chesica Gilson Hall, Of Counsel
The Phoenix Law Group, PLC
8765 E. Bell Road, Suite 110
Scottsdale, Arizona 85260
(480) 444-3500 Main
(602) 690-3077 Mobile
(480) 444-1270 Fax
chall@phoenixlawgroup.com
www.phoenixlawgroup.com

Sent from my iPhone

On Aug 12, 2016, at 2:19 PM, Angelina Eustaquio <eustaquioam@gmail.com> wrote:

> Hafa Adai fellow board members,
>
> I apologize for not being able to meet with you in July, but I have attached my comments to the current tele pharmacy draft, as requested, in the attachment below.
> In summary, I had concerns about the institutional pharmacy definition and the change of title to ROE. I've supported my concerns with current definitions in our practice act and the new NABP resolutions that were just passed.
>
> Secondly, I still do not agree with our advisor on how we should address (or not address) the inquiries from off-island pharmacies. To review, since I've been on the board in 2015, we've had the following requests:
> 11/15 - PDL labs (pharmacist)
> 11/15 - Mr. Mcallister (patient)
> 12/15 - Mr Goodhue (pharmacist)
> 2/16 - Jessica Jun (lawyer)
> 2/16 - Sam Magnuson (lawyer)
> 8/16 - Chesica Hall (lawyer)
> I may have missed one or 2. I believe this is an issue we should address sooner than later regardless of a special application since it is clearly stated in 10GCA-12628.
> § 12628. Licensing of Facilities: Licensing.
>
> (a) All Persons, engaging in the Practice of Pharmacy or in the manufacture, production, sale, or distribution of drugs or devices, or pharmacies where drugs or

devices are dispensed, shall be licensed by the Board of Pharmacy, and shall annually renew their license with the Board. Where operations are conducted at more than one location, each such location shall be licensed by the Board of Pharmacy.

I do believe it's important to move forward and bring our board/regulation of the practice on our island into the modern age. But we should prioritize evaluating whether or not we need to go back and remedy any inconsistencies that have been status quo for decades. The case seems more important when the licensees themselves are coming forward, wanting to be compliant, but we are giving them a letter saying we are not prepared. We should've sent them the application as it stands instead so we have an address, a responsible party, a license number, and a record on file.

Also, the fact that these inquiries are coming from attorneys should raise our eyebrows. Please let us remember that as stated by our AAG, we are the subject matter experts.

Lastly, if we do have an open seat on the board in the future, I believe we should make that known to GPhA so we can open up the floor to any who is interested in serving.

<Final Draft Telepharmacy Rules 072816ae.pdf>

Si yu'os ma'ase,
Angie

On Aug 11, 2016, at 2:26 AM, caruso <jcaruso@guam.net> wrote:

Vangie,

At our Board meeting on July 28th we made many changes to the DRAFT which should have taken care of any concerns of stakeholders comments.
Rob's comments from April are not as much of an issue as they were then.
In addition, at the last meeting attended by GPHA members and Rick Schnitzer, I reassured them that the revised draft would not allow the expansion of telepharmacy to the retail level. I don't think we need to do any more than express that GPHA concerns were taken under advisement and changes to the draft were made reflecting those concerns, or words to that effect.

If any Board members think we need to have a working session to go over the revised draft let me know and we can have one before the next regular meeting.

Jerry

Hafa Adai board,

Just want to include info regarding Rob's recommendation in (3) below, if
you all agree. He says to explain that their (Gpha) concerns are unfounded. How do we state this?

I'd like to finalize the position statement and move on to other drafts we
need to hold a public hearing on, or are we on the right track? Are we on
the same page?

Please advise/give feedback.

Thank you,

Vangie

Sent from my iPhone

> On Apr 30, 2016, at 4:12 PM, Rob Weinberg <rweinberg@guamag.org> wrote:
>
> Three quick comments:
>
> (1) changing the word "means" to "is defined as" is inconsistent with
> how the rest of the definitions are phrased.
>
> (2) There is no such thing as "Guam Licensed Hospital." GovGuam does not
> license hospitals. Hospital may be accredited, e.g., by the Joint
> Commission, or their pharmacy may receive health certificates from Dept.
> of Public Health. I don't know what they think they are intending by
> coining that phrase.
>
> (3) It appears that they are substantively altering the meaning and
> underlying intent of telepharmacy as originally presented and drafted. I
> think the Board is really going to need to take its time addressing
> these comments/suggestions. A written response on the merits from a
> volunteer would be advisable, because it is very likely these
> complaints/suggestions/criticisms will resurface before the Legislature.
> So it is advisable to have a coherent response prepared where you
> explain what it is that your are intending here and why their concerns
> are unfounded and that their proposed solutions miss the mark.
>
> Perhaps you might want to write a statement of findings and intent as
> part of the rules, to explain what these are.
>
> ~Rob

Robert M. Weinberg
Assistant Attorney General
Office of the Attorney General
590 S. Marine Corps Drive
Suite 706, ITC Building
Tamuning, Guam 96913
(671) 475-3324 ext. 3095
(671) 687-7720 (cell)

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From: Heather Narcis [Heather.Narcis@dphss.guam.gov]
Sent: Saturday, April 30, 2016 11:16 AM
To: Angelina Eustaquio; Lourdes Phillips ; Maggie Greenwood ; Racquel Sperrazzo (rsperrazzo@gmail.com); Thomas Caruso
Cc: Rob Weinberg; rob weinberg
Subject: GPhA Submission of Telepharmacy Draft

Good Morning All,

Please see attached for your review.

Best Regards,

Heather A. Narcis
Clerk III
Department of Public Health & Social Services
Division of General Management
Health Professional Licensing Office/EMS Office
123 Chalan Kareta
Mangilao, Guam 96913
Tel: (671) 735-7408
Email: heather.narcis@dphss.guam.gov
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have received this transmission in error, please
return the material
received to the sender
heather.narcis@dphss.guam.gov

Rob Weinberg

From:	Rob Weinberg
Sent:	Saturday, April 30, 2016 4:12 PM
To:	Angelina Eustaquio; Lourdes Phillips ; Maggie Greenwood ; Racquel Sperrazzo (rsperrazzo@gmail.com); Thomas Caruso
Cc:	Heather Narcis
Subject:	RE: GPhA Submission of Telepharmacy Draft

Three quick comments:

(1) changing the word "means" to "is defined as" is inconsistent with how the rest of the definitions are phrased.

(2) There is no such thing as "Guam Licensed Hospital." GovGuam does not license hospitals. Hospital may be accredited, e.g., by the Joint Commission, or their pharmacy may receive health certificates from Dept. of Public Health. I don't know what they think they are intending by coining that phrase.

(3) It appears that they are substantively altering the meaning and underlying intent of telepharmacy as originally presented and drafted. I think the Board is really going to need to take its time addressing these comments/suggestions. A written response on the merits from a volunteer would be advisable, because it is very likely these complaints/suggestions/criticisms will resurface before the Legislature. So it is advisable to have a coherent response prepared where you explain what it is that your are intending here and why their concerns are unfounded and that their proposed solutions miss the mark.

Perhaps you might want to write a statement of findings and intent as part of the rules, to explain what these are.

~Rob

Robert M. Weinberg
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Cc: Rob Weinberg; rob weinberg
Subject: GPhA Submission of Telepharmacy Draft

Good Morning All,

Please see attached for your review.

Best Regards,

Heather A. Narcis
Clerk III
Department of Public Health & Social Services
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Health Professional Licensing Office/EMS Office
123 Chalan Kareta
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Last Reviewed and Edited by Subcommittee on November 19, 2015

DRAFT TELEPHARMACY RULES

Proposed Amendments to Title 25 GAR Ch. 13

(Nov. 19, 2015)

§ 13101. **Definitions.**

* * *

(19) **Telepharmacy** means the provision of pharmacist care, by a pharmacist located within the United States, its territories, and the District of Columbia using telecommunications, remote order entry, or other automations and technologies to deliver care to patients or their agents who are located at sites other than where the pharmacist is located.

(20) **Drug regimen review** means an evaluation of prescription drug orders and patient profile records for:

(1) known allergies;
(2) rational therapy-contraindications;
(3) reasonable dose and route of administration;
(4) reasonable directions for use;
(5) duplication of therapy;
(6) drug-drug interactions;
(7) drug-food interactions;
(8) adverse drug reactions; and
(9) proper utilization, including over-utilization or under-utilization.

(21) **Receiving Pharmacy** means an institutional pharmacy on Guam that has contracted with a remote site to provide pharmacist services after its normal business hours.

(22) **Remote medication order processing** or **"RMOP"** (also known as Remote medication order entry) means the processing of a medication order for an institutional facility by a pharmacist located at a remote site. Remote medication order processing does not include the dispensing of a drug, but may include receiving, interpreting, evaluating, clarifying and approval of medication orders. Additionally, remote medication order processing may include order entry, other data entry, performing prospective drug utilization review, interpreting clinical data, performing therapeutic interventions, and providing drug information services, and authorizing release of the medication for administration.

(23) **Remote medication order processing site or facility** means a site or facility which does not stock, own, or dispense any prescription medications, and whose sole business consists of entry and/or review and/or verification of a prescriber's orders and consulting services under contract for institutional facilities licensed in Guam or any other United States jurisdiction, and which provide services under the direction of a pharmacist in charge or PIC, licensed by the Board.

(24) **Remote pharmacist** means any person licensed to practice pharmacy by the Board, either employed or a contract employee of an institutional facility, hospital pharmacy, or remote medication order processing site or facility, processing the medication order from a remote site.

(25) **Remote site** means a site located ~~within the United States~~ on Guam, a territory thereof, or District of Columbia that is electronically linked to an institutional facility via a computer and/or other electronic communications system as defined in the operations, policies and procedures

define Remote RPh – qualifications

DRAFT

manual of an institutional pharmacy or remote medication order processing site or facility for the purposes of remote medication order processing.

(26) **After-hours Service** means pharmacy coverage by the remote site for all hours not covered by the receiving pharmacy located on Guam.

(27) **Institutional facility** means any child care facility; penal institution; school; hospital; clinic; nursing home; or laboratory as further defined in 10 GCA § 25101.

§ 13111. Fees. Repealed (superseded by P.L. 24-207).

§ 13112. **Hospital, Long-Term Care Facility, or Pharmacy; Use of Automated Medication System; Policies and Procedures Required.** Any hospital, long-term care facility, institutional facility, or pharmacy that uses an automated medication system shall develop, maintain, and comply with policies and procedures developed in consultation with the pharmacist responsible for pharmacist care for that hospital, long-term care facility, or pharmacy. At a minimum, the policies and procedures shall address the following:

(a) The description and location within the hospital, long-term care facility, institutional facility or pharmacy of the automated medication system or equipment being used;

(b) The name of the individual or individuals responsible for implementation of and compliance with the policies and procedures;

(c) Medication access and information access procedures;

(d) Security of inventory and confidentiality of records in compliance with state and federal laws, rules, and regulations;

(e) A description of how and by whom the automated medication system is being utilized, including processes for filling, verifying, dispensing, and distributing medications;

(f) Staff education and training;

(g) Quality assurance and quality improvement programs and processes;

(h) Inoperability or emergency downtime procedures;

(i) Periodic system maintenance; and

(j) Medication security and controls.

§ 13113. **Prescription Medication Distribution Machine; Requirements; Location.** A prescription medication distribution machine:

(a) is subject to the requirements of § 13112; and

(b) may be operated only in a licensed pharmacy where a pharmacist dispenses medications to patients for self-administration pursuant to a prescription.

§ 13114. **Automated Medication Distribution Machine; Requirements; Drugs; Limitations; Inventory; How Treated.**

(a) An automated medication distribution machine:

(1) is subject to the requirements of § 13112; and

(2) may be operated in a hospital, institutional facility, or long-term care facility for medication administration pursuant to a chart order or prescription by a licensed health care professional.

DRAFT

(b) Drugs placed in an automated medication distribution machine shall be in the manufacturer's original packaging or in containers repackaged in compliance with Guam and federal laws, rules, and regulations relating to repackaging, labeling, and record keeping.

§ 13115. **Remote Medication Order Processing By a Remote Site; General Requirements.**

(a) A Guam institutional facility, hospital, long-term care facility, or pharmacy may utilize remote medication order processing if the pharmacist performing the remote medication order processing has access to sufficient patient information necessary for prospective drug use review and approval of medication orders.

(b) The pharmacist may be employed or contracted by the entity.

(1) The pharmacist must be a Guam licensed pharmacist.

(2) The entity must have a written agreement or contract with the pharmacist.

(c) The written agreement or contract shall:

(1) Outline the services to be provided.

(2) Delineate the responsibilities of each party (entity?) including compliance with federal and Guam laws and regulations governing the practice of pharmacy as well as Guam and federal medical privacy requirements.

(3) Require that the parties (entities?) adopt a policies and procedures manual.

(4) Provide that the parties (entities?) have access to or share a common electronic file such that the pharmacist performing remote medication order processing has sufficient patient information necessary for prospective drug use review and approval of medication orders.

§ 13116. **Pharmacist Providing Pharmacist Remote Order Entry; Requirements.** A pharmacist providing pharmacist remote order entry shall:

(a) be located in a site or facility licensed by the Board;

(b) be located within the United States, a territory thereof, or the District of Columbia;

(c) maintain adequate security and privacy in accordance with state and federal laws, rules, and regulations;

(d) be linked to one or more hospitals, long-term care facilities, institutional facility, or pharmacies for which services are provided via computer link, video link, audio link, or facsimile transmission or other electronic devices;

(e) have access to each patient's medical information necessary to perform via computer link, video link, or facsimile transmission or other electronic devices, a prospective drug utilization review as defined in § 13101(20), Drug Regimen Review;

(f) be employed by or have a contractual agreement to provide such services with the hospital, long-term care facility, institutional facility, or pharmacy where the patient is located.

§ 13117. **Notifications to patients.** A pharmacy that outsources off-site prescription order entry to another pharmacy shall prior to outsourcing their prescription:

(a) notify patients that prescription processing may be outsourced to another pharmacy/facility; and

(b) provide the name of that pharmacy to the patient, or if the pharmacy is part of a network of pharmacies under common ownership and any of the network pharmacies may

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process the prescription, the patient shall be notified of this fact. Such notification may be provided through a one-time written notice to the patient.

§ 13118. **Records.** All pharmacies shall maintain appropriate records which identify, by prescription drug order, the name(s), initials, or identification code(s) of each pharmacist or pharmacist and pharmacy technician who performs a processing function for a prescription drug order. Any record generated in this process whether in a hard copy or electronic format shall be maintained for a minimum period of five years from the last date of entry. Such records may be maintained:

(a) separately by each pharmacy and pharmacist; or

(b) in a common electronic file as long as the records are maintained in such a manner that the data processing system can produce a printout which lists the functions performed by each pharmacy and pharmacist.

(c) and have the ability to audit the activities of the individuals remotely processing medication orders.

§ 13119. **Patient Privacy.** In the operation of the offsite order entry, patient confidentiality and full compliance with HIPAA requirements shall be observed at all times.

§ 13120. **Submission to the Jurisdiction of the Board.** The filing of an application for licensure or registration to practice telepharmacy by a nonresident pharmacist or pharmacy shall constitute the pharmacist's or pharmacy's agreement to abide by the laws and rules and regulations governing the practice of pharmacy in Guam and submission to the jurisdiction of the Guam Board of Examiners for Pharmacy.

§ 13121. **Contracts, agreements, training, policies and procedures for remote sites.**

(a) An institutional facility may outsource medication order processing to a remote site provided the pharmacies have the same owner; or the institutional facility has entered into a written contract or agreement with an outsourcing company which outlines the services to be provided and the responsibilities and accountabilities of each pharmacy in compliance with federal and state laws and regulations. The pharmacy providing the remote processing of medication orders must be licensed or registered by the Board.

(b) A remote site providing remote medication order processing must insure that all pharmacists providing such services have been trained on each pharmacy's policies and procedures relating to medication order processing. Such training shall include, but not be limited to, policies on abbreviations, administration times, automatic stop orders, substitution, and formulary compliance.

DRAFT

(c) All remote sites involved in remote order processing shall maintain a policy and procedure manual. Each remote site is required to maintain those portions of the policy and procedure manual that relate to that institution's operations. The manual shall:

(1) outline the responsibilities of each remote site and institutional facility or pharmacy;

(2 include a list of the name, address, telephone numbers, and all license/registration numbers of the pharmacists and the facility or site involved in remote order processing; and

(3) include policies and procedures for:

(i) protecting the confidentiality and integrity of patient information;

(ii) maintenance of appropriate records to identify the name(s), initials, or identification code(s) and specific activity(ies) of each pharmacist who performed any processing;

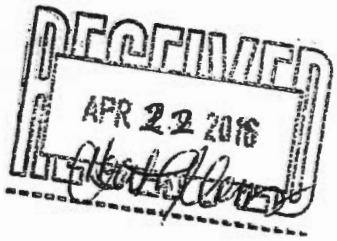
(iii) complying with federal and Guam laws and regulations;

(iv) operating a continuous quality improvement program for pharmacy services designed to objectively and systematically monitor and evaluate the quality and appropriateness of patient care, pursue opportunities to improve patient care, and resolve identified problems; and

(v) annually reviewing the written policies and procedures and documenting such review.

DRAFT

Guam Pharmacists Association
PO Box 26940
Barrigada, Guam 96921



April 18, 2016

To: Guam Board of Pharmacy

Dear Members of the Guam Board of Pharmacy:

The purpose of this letter and the attached "changes" to the "Draft Telepharmacy Rules" (last reviewed and edited by subcommittee on November 19, 2015) is to provide feedback to the board from our Guam pharmacists, owners and other stakeholders in order to address the needs of the applicants and the needs of our citizens and pharmacists.

We have requested and received several changes to the original rules as attached.
The focus of our attention has been to allow remote order entry processing limited to Guam licensed hospitals servicing acute care only as a supplement to onsite care to provide pharmacist services after its normal business hours.
We have defined the word hospital as one of the changes in the draft.
We have included a limit of one RMOP site per hospital

As we on Guam are NOT underserved, we have removed references to RMOP with regard to prescription medications which can be dispensed in a "Prescription Medication Distribution Machine" or a "Automated Medication Distribution Machine" in a retail setting, institutional facility, school, nursing home, laboratory, penal institution, child care center or clinic as originally written in the draft.

Please note that the recommendations we made based upon feedback from oral conversations with pharmacists and stakeholders, a survey passed to pharmacists and members of the Guam Pharmacists Association and testimony from Dr. Gary Roy, PIC GRMC pharmacy at a meeting and personal conversations with him.

Our last line allows the Guam Board Examiners for Pharmacy to reassess a telepharmacy applicant on an annual basis to determine need and impact on the community.

Please let us know of your decision with respect to implementing our requirements on this important issue for our Guam pharmacists.

Respectfully submitted,

Cheryl Marimla
President
Guam Pharmacists Association

Reviewed and Edited by Subcommittee on November 19, 2015
Reviewed and Edited by Subcommittee on November 19,2015

DRAFT TELEPHARMACY REMOTE ORDER ENTRY RULES FOR GUAM HOSPITALS

Proposed Amendments to Title 25 GAR Ch. 13

§ 13101. **Definitions.**

* * *

(19) **Telepharmacy** ~~means~~ is defined as the provision of pharmacist care, by a pharmacist located within the United States, its territories, and the District of Columbia ~~using telecommunications~~, remote order entry, ~~or other automations and technologies~~ to deliver care to patients or their agents who are located at sites other than where the pharmacist is located as a supplement to onsite care in acute care settings

(20) **Drug regimen review** means an evaluation of prescription drug orders and patient profile records for:

(1) known allergies;
(2) rational therapy-contraindications;
(3) reasonable dose and route of administration;
(4) reasonable directions for use;
(5) duplication of therapy;
(6) drug-drug interactions;
(7) drug-food interactions;
(8) adverse drug reactions; and
(9) proper utilization, including over-utilization or under-utilization.

(21) **Receiving Pharmacy** ~~means an~~ is defined as Guam Hospital pharmacy licensed on Guam that has contracted with a remote site to provide pharmacist services after its normal business hours. Limited to one site per hospital

(22) **Remote medication order processing or "RMOP"** (also known as Remote medication order entry) is defined as the processing of a medication order for a GUAM LICENSED HOSPITAL by a pharmacist located at a remote site. Remote medication order processing does not include the dispensing of a drug, but may include receiving, interpreting, evaluating, clarifying and approval of medication orders. Additionally, remote medication order processing may include order entry, other data entry, performing prospective drug utilization review, interpreting clinical data, performing therapeutic interventions, and providing drug information services, and authorizing release of the medication for administration to in-patient in a Guam licensed hospital by a Guam licensed healthcare professional.

(23) **Remote medication order processing site or facility** means a site or facility which does not stock, own, or dispense any prescription medications, and whose sole business consists of entry and/or review and/or verification of a prescriber's orders and consulting services under contract for hospitals licensed in Guam or any other United States jurisdiction, and which provide services under the direction of a pharmacist in charge or PIC, licensed by the Board.

(24) **Remote pharmacist** is defined as any person licensed to practice pharmacy by the Board,

either employed or a contract employee of a GUAM LICENSED HOSPITAL, hospital pharmacy, or remote medication order processing site or facility, processing the medication order from a remote site.

(25) **Remote site** ~~means~~ is defined asa site located within the United States, a territory thereof, or District of Columbia that is electronically linked to a GUAM LICENSED HOSPITAL via a computer and/or other electronic communications system as defined in the operations, policies and procedures

manual of an ~~institutional~~ hospital pharmacy or remote medication order processing site or facility for th purposes of remote medication order processing.

(26) **After-hours Service** is defined as hospital pharmacy to provide remote medication order processing coverage by the remote site for all hours not covered by the receiving pharmacy located on Guam.

(27) ~~**Institutional Facility**~~ **GUAM LICENSED HOSPITAL is defined as** ~~means any child care facility; penal institution; school hospital; clinic; nursing home; or laboratory~~ a hospital licensed in Guam with a minimum of 100-beds serving patients in an acute care setting.~~as further defined in 10 GCA § 25101.~~

(28) Medication Order is defined as written directions provided by a prescribing practitioner for a specific medication to be administered to an in-patient in a GUAM LICENSED HOSPITAL by a Guam licensed healthcare professional. The prescribing practitioner may also give a medication order verbally.

§ 13111. Fees. Repealed (superseded by P.L. 24-207).

§ 13112. **Hospital, ~~Long-Term Care Facility,~~ or hospital Pharmacy; Use of Automated Medication System; Policies and Procedures Required.** Any hospital,~~ long-term care facility, institutional facility,~~ or hospital pharmacy that uses an automated medication system shall develop, maintain, and comply with policies and procedures developed in consultation with the pharmacist responsible for pharmacist care for that hospital, ~~long-term care facility,~~ or hospital pharmacy. At a minimum, the policies and procedures shall address the following:

(a) The description and location within the ~~,hospital long-term care facility,~~ GUAM LICENSED HOSPITAL or hospital pharmacy of the automated medication system or equipment being used;

(b) The name of the individual or individuals responsible for implementation of and compliance with the policies and procedures;

(c) Medication access and information access procedures;

(d) Security of inventory and confidentiality of records in compliance with state and federal laws, rules, and regulations;

(e) A description of how and by whom the automated medication system is being utilized, including processes for filling, verifying, dispensing, and distributing medications;

(f) Staff education and training;

(g) Quality assurance and quality improvement programs and processes;

(h) Inoperability or emergency downtime procedures;

(i) Periodic system maintenance; and

(j) Medication security and controls.

(k) Hospitals may have only one receiving pharmacy

~~§ 13113. **Prescription Medication Distribution Machine; Requirements; Location.** A prescription medication distribution machine:~~

~~(a) is subject to the requirements of § 13112; and~~

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(b) Drugs placed in an automated medication distribution machine shall be in the manufacturer's original packaging or in' containers repackaged in compliance with Guam and federal laws, rules, and regulations relating to repackaging, labeling, and record keeping.

§ 13115. **Remote Medication Order Processing By a Remote Site; General Requirements.**

(a) A GUAM ~~institutional facility~~, LICENSED HOSPITAL, ~~long-term care facility~~, ~~or pharmacy~~ may utilize remote medication order processing if the pharmacist performing the remote medication order processing has access to sufficient patient information necessary for prospective drug use review and approval of medication orders.

(b) The pharmacist may be employed or contracted by the entity.

(1) The pharmacist must be a Guam licensed pharmacist.

(2) The entity must have a written agreement or contract with the pharmacist.

(c) The written agreement or contract shall:

(1) Outline the services to be provided.

(2) Delineate the responsibilities of each entity including compliance with federal and Guam laws and regulations governing the practice of pharmacy as well as.Guam and federal privacy requirements.

(3) Require that the entities adopt a policies and procedures manual. (4) Provide that the entities have access to or share a common electronic file such that the pharmacis perfo mg remote medication order processing has sufficient patient information necessary or prospective drug use review and approval of medication orders.

§ 13116. **Pharmacist Providing Pharmacist Remote Order Entry; Requirements.** A pharmacist providing pharmacist remote order entry shall:

(a) be located in a site or facility licensed by the Board;

(b) be located within the United States, a territory thereof, or the District of Columbia;

(c) maintain adequate security and privacy in accordance with state and federal laws, rules, and regulations;

(d) be linked to ~~one or more hospitals~~ ,a GUAM LICENSED HOSPITAL ~~long-term care facilities, institutional facility.~~ or hospital pharmacy for which services are provided via computer link, video link, audio link, or facsimile transmission or other electronic devices;

(e) have access to each patient's medical information necessary to perform via computer link, video link, or facsimile transmission or other electronic devices, a prospective drug utilization review as defined in § 13101 (20), Drug Regimen Review;

(f) be employed by or have a contractual agreement to provide such services with the hospital, ~~long term care facility, institutional facility,~~ or hospital pharmacy where the patient is located;

~~§ 13117. Notifications to patients. A pharmacy that outsources off-site prescription order entry to another pharmacy shall prior to outsourcing their prescription:~~

~~(a) notify patients that prescription processing may be outsourced to another pharmacy; and~~

~~(b) provide the name of that pharmacy to the patient, or if the pharmacy is part of a network of pharmacies under common ownership and any of the network pharmacies may~~

~~process the prescription, the patient shall be notified of this fact. Such notification may b provided through a one time written notice the patient.~~

§ 13118. **Records.** All pharmacies shall maintain appropriate records which identify, by ~~prescription drug~~ medication order, the name(s), initials, or identification code(s) of each pharmacist or pharmacist and pharmacy technician who performs a processing function for a prescription drug order. Any record generated in this process whether in a hard copy or electronic format shall be maintained for a minimum period of ~~five~~ ten years from the last date of entry. Such records may be maintained:

(a) separately by each pharmacy and pharmacist; or

(b) in a common electronic file as long as the records are maintained in such a manner that the data processing system can produce a printout which lists the functions performed by each pharmacy and pharmacist.

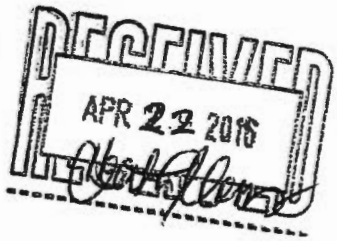
(c) and have the ability to audit the activities of the individuals remotely processing medication orders.

§ 13119. **Patient Privacy.** In the operation of the offsite order entry, patient confidentiality and full compliance with HIPAA requirements shall be observed at all times.

§ 13120. **Submission to the Jurisdiction of the Board.** The filing of an application for licensure or registration to practice telepharmacy by a nonresident pharmacist or hospital pharmacy shall constitute the pharmacist's, hospital pharmacy's, and GUAM LICENSED HOSPITAL'S agreement to abide by the laws and rules and regulations governing the practice of pharmacy in Guam and submission to the jurisdiction of the Guam Board of Examiners for Pharmacy.

§ 13121. Guam Board of Examiners for Pharmacy shall reassess all telepharmacy applicants on an annual basis to determine the need for telepharmacy and its impact on Guam's citizens, pharmacists, and pharmacies. GBEP shall then determine the continued need for telepharmacy before approving any renewals of telepharmacy applicants.

Guam Pharmacists Association
PO Box 26940
Barrigada, Guam 96921



April 18, 2016

To: Guam Board of Pharmacy

Dear Members of the Guam Board of Pharmacy:

The purpose of this letter and the attached "changes" to the "Draft Telepharmacy Rules" (last reviewed and edited by subcommittee on November 19, 2015) is to provide feedback to the board from our Guam pharmacists, owners and other stakeholders in order to address the needs of the applicants and the needs of our citizens and pharmacists.

We have requested and received several changes to the original rules as attached.
The focus of our attention has been to allow remote order entry processing limited to Guam licensed hospitals servicing acute care only as a supplement to onsite care to provide pharmacist services after its normal business hours.
We have defined the word hospital as one of the changes in the draft.
We have included a limit of one RMOP site per hospital

As we on Guam are NOT underserved, we have removed references to RMOP with regard to prescription medications which can be dispensed in a "Prescription Medication Distribution Machine" or a "Automated Medication Distribution Machine" in a retail setting, institutional facility, school, nursing home, laboratory, penal institution, child care center or clinic as originally written in the draft.

Please note that the recommendations we made based upon feedback from oral conversations with pharmacists and stakeholders, a survey passed to pharmacists and members of the Guam Pharmacists Association and testimony from Dr. Gary Roy, PIC GRMC pharmacy at a meeting and personal conversations with him.

Our last line allows the Guam Board Examiners for Pharmacy to reassess a telepharmacy applicant on an annual basis to determine need and impact on the community.

Please let us know of your decision with respect to implementing our requirements on this important issue for our Guam pharmacists.

Respectfully submitted,

Cheryl Marimla
President
Guam Pharmacists Association

Reviewed and Edited by Subcommittee on November 19, 2015
Reviewed and Edited by Subcommittee on November 19,2015

DRAFT TELEPHARMACY REMOTE ORDER ENTRY RULES FOR GUAM HOSPITALS

Proposed Amendments to Title 25 GAR Ch. 13

§ 13101. **Definitions.**

* * *

(19) **Telepharmacy** means is defined as the provision of pharmacist care, by a pharmacist located within the United States, its territories, and the District of Columbia [redacted], remote order entry, [redacted] to deliver care to patients or their agents who are located at sites other than where the pharmacist is located as a supplement to onsite care in acute care settings

(20) **Drug regimen review** means an evaluation of prescription drug orders and patient profile records for:

(1) known allergies;
(2) rational therapy-contraindications;
(3) reasonable dose and route of administration;
(4) reasonable directions for use;
(5) duplication of therapy;
(6) drug-drug interactions;
(7) drug-food interactions;
(8) adverse drug reactions; and
(9) proper utilization, including over-utilization or under-utilization.

(21) **Receiving Pharmacy** [redacted] is defined as Guam Hospital pharmacy licensed on Guam that has contracted with a remote site to provide pharmacist services after its normal business hours. Limited to one site per hospital

(22) **Remote medication order processing or "RMOP"** (also known as Remote medication order entry) is defined as the processing of a medication order for a GUAM LICENSED HOSPITAL by a pharmacist located at a remote site. Remote medication order processing does not include the dispensing of a drug, but may include receiving, interpreting, evaluating, clarifying and approval of medication orders. Additionally, remote medication order processing may include order entry, other data entry, performing prospective drug utilization review, interpreting clinical data, performing therapeutic interventions, and providing drug information services, and authorizing release of the medication for administration to in-patient in a Guam licensed hospital by a Guam licensed healthcare professional.

(23) **Remote medication order processing site or facility** means a site or facility which does not stock, own, or dispense any prescription medications, and whose sole business consists of entry and/or review and/or verification of a prescriber's orders and consulting services under contract for hospitals licensed in Guam or any other United States jurisdiction, and which provide services under the direction of a pharmacist in charge or PIC, licensed by the Board.

(24) **Remote pharmacist** is defined as any person licensed to practice pharmacy by the Board,

either employed or a contract employee of a GUAM LICENSED HOSPITAL, hospital pharmacy, or remote medication order processing site or facility, processing the medication order from a remote site.

(25) **Remote site** [redacted] is defined as a site located within the United States, a territory thereof, or District of Columbia that is electronically linked to a GUAM LICENSED HOSPITAL via a computer and/or other electronic communications system as defined in the operations, policies and procedures

manual of an [redacted] hospital pharmacy or remote medication order processing site or facility for th purposes of remote medication order processing.

(26) **After-hours Service** is defined as hospital pharmacy to provide remote medication order processing coverage by the remote site for all hours not covered by the receiving pharmacy located on Guam.

(27) [redacted] **GUAM LICENSED HOSPITAL is defined as** [redacted] a hospital licensed in Guam with a minimum of 100-beds serving patients in an acute care setting. [redacted]

(28) Medication Order is defined as written directions provided by a prescribing practitioner for a specific medication to be administered to an in-patient in a GUAM LICENSED HOSPITAL by a Guam licensed healthcare professional. The prescribing practitioner may also give a medication order verbally.

§ 13111. Fees. Repealed (superseded by P.L. 24-207).

§ 13112. **Hospital,** [redacted] **, or hospital Pharmacy; Use of Automated Medication System; Policies and Procedures Required.** Any hospital [redacted], or hospital pharmacy that uses an automated medication system shall develop, maintain, and comply with policies and procedures developed in consultation with the pharmacist responsible for pharmacist care for that hospital, [redacted], or hospital pharmacy. At a minimum, the policies and procedures shall address the following:

(a) The description and location within the [redacted], GUAM LICENSED HOSPITAL or hospital pharmacy of the automated medication system or equipment being used;

(b) The name of the individual or individuals responsible for implementation of and compliance with the policies and procedures;

(c) Medication access and information access procedures;

(d) Security of inventory and confidentiality of records in compliance with state and federal laws, rules, and regulations;

(e) A description of how and by whom the automated medication system is being utilized, including processes for filling, verifying, dispensing, and distributing medications;

(f) Staff education and training;

(g) Quality assurance and quality improvement programs and processes;

(h) Inoperability or emergency downtime procedures;

(i) Periodic system maintenance; and

(j) Medication security and controls.

(k) Hospitals may have only one receiving pharmacy

[redacted]

[redacted]

§ 13114. **Automated Medication Distribution Machine; Requirements; Drugs; Limitations; Inventory; How Treated.**

(a) An automated medication distribution machine:

(1) is subject to the requirements of § 13112; and

(2) may be operated in a GUAM LICENSED HOSPITAL, [redacted] for medication administration pursuant to a [redacted] medication order by a Guam licensed healthcare professional.

(b) Drugs placed in an automated medication distribution machine shall be in the manufacturer's original packaging or in' containers repackaged in compliance with Guam and federal laws, rules, and regulations relating to repackaging, labeling, and record keeping.

§ 13115. **Remote Medication Order Processing By a Remote Site; General Requirements.**

(a) A GUAM [redacted], LICENSED HOSPITAL, [redacted], [redacted] may utilize remote medication order processing if the pharmacist performing the remote medication order processing has access to sufficient patient information necessary for prospective drug use review and approval of medication orders.

(b) The pharmacist may be employed or contracted by the entity.

(1) The pharmacist must be a Guam licensed pharmacist.

(2) The entity must have a written agreement or contract with the pharmacist.

(c) The written agreement or contract shall:

(1) Outline the services to be provided.

(2) Delineate the responsibilities of each entity including compliance with federal and Guam laws and regulations governing the practice of pharmacy as well as.Guam and federal privacy requirements.

(3) Require that the entities a dopt a policies and procedures manual. (4) Provide that the entities have access to or share a common electronic file such that the pharmacis perfo mg remote medication order processing has sufficient patient information necessary or prospective drug use review and approval of medication orders.

§ 13116. **Pharmacist Providing Pharmacist Remote Order Entry; Requirements.** A pharmacist providing pharmacist remote order entry shall:

(a) be located in a site or facility licensed by the Board;

(b) be located within the United States, a territory thereof, or the District of Columbia;

(c) maintain adequate security and privacy in accordance with state and federal laws, rules, and regulations;

(d) be linked to [redacted],a GUAM LICENSED HOSPITAL [redacted] or hospital pharmacy for which services are provided via computer link, video link, audio link, or facsimile transmission or other electronic devices;

(e) have access to each patient's medical information necessary to perform via computer link, video link, or facsimile transmission or other electronic devices, a prospective drug utilization review as defined in § 13101 (20), Drug Regimen Review;

Reviewed and Edited by Subcommittee on November 19, 2015

(f) be employed by or have a contractual agreement to provide such services with the hospital, [redacted], or hospital pharmacy where the patient is located;

[redacted]

[redacted]

§ 13118. **Records.** All pharmacies shall maintain appropriate records which identify, by [redacted] medication order, the name(s), initials, or identification code(s) of each pharmacist or pharmacist and pharmacy technician who performs a processing function for a prescription drug order. Any record generated in this process whether in a hard copy or electronic format shall be maintained for a minimum period of [redacted] ten years from the last date of entry. Such records may be maintained:

(a) separately by each pharmacy and pharmacist; or

(b) in a common electronic file as long as the records are maintained in such a manner that the data processing system can produce a printout which lists the functions performed by each pharmacy and pharmacist.

(c) and have the ability to audit the activities of the individuals remotely processing medication orders.

§ 13119. **Patient Privacy.** In the operation of the offsite order entry, patient confidentiality and full compliance with HIPAA requirements shall be observed at all times.

§ 13120. **Submission to the Jurisdiction of the Board.** The filing of an application for licensure or registration to practice telepharmacy by a nonresident pharmacist or hospital pharmacy shall constitute the pharmacist's, hospital pharmacy's, and GUAM LICENSED HOSPITAL'S agreement to abide by the laws and rules and regulations governing the practice of pharmacy in Guam and submission to the jurisdiction of the Guam Board of Examiners for Pharmacy.

§ 13121. Guam Board of Examiners for Pharmacy shall reassess all telepharmacy applicants on an annual basis to determine the need for telepharmacy and its impact on Guam's citizens, pharmacists, and pharmacies. GBEP shall then determine the continued need for telepharmacy before approving any renewals of telepharmacy applicants.

Guam Pharmacists Association

P.O Box 9520 Tamuning, Guam 96931
gpha671@gmail.com

Mildred Gabriel
President

Kristen Kim
Vice President

Nadine Tenorio
Recording Secretary

Karen Song
Corresponding Secretary

Treasurer

Associate Representative

Director
Special Affairs

August 17, 2016

To: Guam Board of Pharmacy

Re: Meeting on Thursday August 18

Dear Heather:

Members of the Guam Pharmacists Association would like to attend the public portion of the meeting this Thursday August 18 to discuss the telepharmacy draft rules and regulations.

We kindly request that this portion of the agenda be moved upward to the front as most of us have to work by 9 am.

We thank you in advance of your consideration.

Regards

Mildred Gabriel

Mildred Gabriel

President

Reviewed and Edited by Subcommittee on November 19, 2015

4/7/16 comments

DRAFT TELEPHARMACY RULES

Proposed Amendments to Title 25 GAR Ch. 13

§ 13101. **Definitions.**

* * *

(19) **Telepharmacy** means the provision of pharmacist care, by a pharmacist located within the United States, its territories, and the District of Columbia using telecommunications, remote order entry, or other automations and technologies to deliver care to patients or their agents who are located at sites other than where the pharmacist is located.

(20) **Drug regimen review** means an evaluation of prescription drug orders and patient profile records for:

(1) known allergies;
(2) rational therapy-contraindications;
(3) reasonable dose and route of administration;
(4) reasonable directions for use;
(5) duplication of therapy;
(6) drug-drug interactions;
(7) drug-food interactions;
(8) adverse drug reactions; and
(9) proper utilization, including over-utilization or under-utilization.

(21) **Receiving Pharmacy** means an institutional pharmacy on Guam that has contracted with a remote site to provide pharmacist services after its normal business hours.

(22) **Remote medication order processing** or **"RMOP"** (also known as Remote medication order entry) means the processing of a medication order for an institutional facility by a pharmacist located at a remote site. Remote medication order processing does not include the dispensing of a drug, but may include receiving, interpreting, evaluating, clarifying and approval of medication orders. Additionally, remote medication order processing may include order entry, other data entry, performing prospective drug utilization review, interpreting clinical data, performing therapeutic interventions, and providing drug information services, and authorizing release of the medication for administration.

(23) **Remote medication order processing site or facility** means a site or facility which does not stock, own, or dispense any prescription medications, and whose sole business consists of entry and/or review and/or verification of a prescriber's orders and consulting services under contract for institutional facilities licensed in Guam or any other United States jurisdiction, and which provide services under the direction of a pharmacist in charge or PIC, licensed by the Board.

(24) **Remote pharmacist** means any person licensed to practice pharmacy by the Board, either employed or a contract employee of an institutional facility, hospital pharmacy, or remote medication order processing site or facility, processing the medication order from a remote site.

(25) **Remote site** means a site located within the United States, a territory thereof, or District of Columbia that is electronically linked to an institutional facility via a computer and/or other electronic communications system as defined in the operations, policies and procedures

manual of an institutional pharmacy or remote medication order processing site or facility for the purposes of remote medication order processing.

(26) **After-hours Service** means pharmacy coverage by the remote site for all hours not covered by the receiving pharmacy located on Guam.

(27) **Institutional facility** means any child care facility; penal institution; school; hospital; clinic; nursing home; or laboratory as further defined in 10 GCA § 25101.

§ 13111. Fees. Repealed (superseded by P.L. 24-207).

§ 13112. **Hospital, Long-Term Care Facility, or Pharmacy; Use of Automated Medication System; Policies and Procedures Required.** Any hospital, long-term care facility, institutional facility, or pharmacy that uses an automated medication system shall develop, maintain, and comply with policies and procedures developed in consultation with the pharmacist responsible for pharmacist care for that hospital, long-term care facility, or pharmacy. At a minimum, the policies and procedures shall address the following:

(a) The description and location within the hospital, long-term care facility, institutional facility or pharmacy of the automated medication system or equipment being used;

(b) The name of the individual or individuals responsible for implementation of and compliance with the policies and procedures;

(c) Medication access and information access procedures;

(d) Security of inventory and confidentiality of records in compliance with state and federal laws, rules, and regulations;

(e) A description of how and by whom the automated medication system is being utilized, including processes for filling, verifying, dispensing, and distributing medications;

(f) Staff education and training;

(g) Quality assurance and quality improvement programs and processes;

(h) Inoperability or emergency downtime procedures;

(i) Periodic system maintenance; and

(j) Medication security and controls.

4/7/16 Remove - per Mildred per Gary, if kept, add respiratory therapist, etc

§ 13113. **Prescription Medication Distribution Machine; Requirements; Location.** A prescription medication distribution machine:

(a) is subject to the requirements of § 13112; and

(b) may be operated only in a licensed pharmacy where a pharmacist dispenses medications to patients for self-administration pursuant to a prescription.

§ 13114. **Automated Medication Distribution Machine; Requirements; Drugs; Limitations; Inventory; How Treated.**

(a) An automated medication distribution machine:

(1) is subject to the requirements of § 13112; and

(2) may be operated in a hospital, institutional facility, or long-term care facility for medication administration pursuant to a chart order or prescription by a licensed health care professional.

(b) Drugs placed in an automated medication distribution machine shall be in the manufacturer's original packaging or in containers repackaged in compliance with Guam and federal laws, rules, and regulations relating to repackaging, labeling, and record keeping.

§ 13115. **Remote Medication Order Processing By a Remote Site; General Requirements.**

(a) A Guam institutional facility, hospital, long-term care facility, or pharmacy may utilize remote medication order processing if the pharmacist performing the remote medication order processing has access to sufficient patient information necessary for prospective drug use review and approval of medication orders.

(b) The pharmacist may be employed or contracted by the entity.

(1) The pharmacist must be a Guam licensed pharmacist.

(2) The entity must have a written agreement or contract with the pharmacist.

(c) The written agreement or contract shall:

(1) Outline the services to be provided.

(2) Delineate the responsibilities of each party (entity??) including compliance with federal and Guam laws and regulations governing the practice of pharmacy as well as Guam and federal medical privacy requirements.

(3) Require that the parties (entities?) adopt a policies and procedures manual.

(4) Provide that the parties (entities?) have access to or share a common electronic file such that the pharmacist performing remote medication order processing has sufficient patient information necessary for prospective drug use review and approval of medication orders.

§ 13116. **Pharmacist Providing Pharmacist Remote Order Entry; Requirements.** A pharmacist providing pharmacist remote order entry shall:

(a) be located in a site or facility licensed by the Board;

(b) be located within the United States, a territory thereof, or the District of Columbia;

(c) maintain adequate security and privacy in accordance with state and federal laws, rules, and regulations;

(d) be linked to one or more hospitals, long-term care facilities, institutional facility, or pharmacies for which services are provided via computer link, video link, audio link, or facsimile transmission or other electronic devices;

(e) have access to each patient's medical information necessary to perform via computer link, video link, or facsimile transmission or other electronic devices, a prospective drug utilization review as defined in § 13101(20), Drug Regimen Review;

(f) be employed by or have a contractual agreement to provide such services with the hospital, long-term care facility, institutional facility, or pharmacy where the patient is located;

§ 13117. **Notifications to patients.** A pharmacy that outsources off-site prescription order entry to another pharmacy shall prior to outsourcing their prescription:

(a) notify patients that prescription processing may be outsourced to another pharmacy; and

(b) provide the name of that pharmacy to the patient, or if the pharmacy is part of a network of pharmacies under common ownership and any of the network pharmacies may

process the prescription, the patient shall be notified of this fact. Such notification may be provided through a one-time written notice to the patient.

§ 13118. **Records.** All pharmacies shall maintain appropriate records which identify, by prescription drug order, the name(s), initials, or identification code(s) of each pharmacist or pharmacist and pharmacy technician who performs a processing function for a prescription drug order. Any record generated in this process whether in a hard copy or electronic format shall be maintained for a minimum period of five years from the last date of entry. Such records may be maintained:

(a) separately by each pharmacy and pharmacist; or

(b) in a common electronic file as long as the records are maintained in such a manner that the data processing system can produce a printout which lists the functions performed by each pharmacy and pharmacist.

(c) and have the ability to audit the activities of the individuals remotely processing medication orders.

§ 13119. **Patient Privacy.** In the operation of the offsite order entry, patient confidentiality and full compliance with HIPAA requirements shall be observed at all times.

§ 13120. **Submission to the Jurisdiction of the Board.** The filing of an application for licensure or registration to practice telepharmacy by a nonresident pharmacist or pharmacy shall constitute the pharmacist's or pharmacy's agreement to abide by the laws and rules and regulations governing the practice of pharmacy in Guam and submission to the jurisdiction of the Guam Board of Examiners for Pharmacy.

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why?
2.Do you feel telepharmacy can be practiced safely?
3.Do you feel comfortable with the technological aspects of telepharmacy?
4.Is Guam underserved?
5.Is Guam short of pharmacists?
6.Is Guam short of pharmacies?
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)?
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)?
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)?
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)?
11.Have you read the GBEP draft telepharmacy rules?
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens?
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed?
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy?
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?)
16.Should it be limited to 1 remote site per 1 off-site telepharmacy?
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam?
18.Should Board have authority to approve or disapprove application based on location of the remote-site?
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam?
20.How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: _____

_____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy survey

1. Do we need telepharmacy on Guam? Why? No. Telepharmacy works in communities where pharmacy services is not available or difficult to obtained on a continuing basis. Guam does not fall in this category of community .
2. Do you feel telepharmacy can be practiced safely? I don't feel comfortable with this type or practice.
3. Do you feel comfortable with the technological aspects of telepharmacy? The concept is presented and marketed as acceptable to some Boards of Pharmacy when needed in rural areas where the lack of pharmaceutical care is affecting people health care.
4. Is Guam underserved? Guam is not underserved in terms of pharmacy services.
5. Is Guam short of pharmacists? Short of pharmacist is relative. In Guam pharmacist availability is hardly experience since many pharmacist are willing to pull part-time services.
6. Is Guam short of pharmacies? Base on the geographical area of Guam, NO!
7. Should telepharmacy be limited only to hospitals (i.e. GMH, GRMC)? Only if hospitals cannot fulfill the demands of inpatient care by the hospitals pharmacy services.
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? Some criteria and guidelines should be considered in the Rules by by the Board of Pharmacy.
9. Should telepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? Some form "telepharmacy" technology may be acceptable but utilizing the available resources on island.
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? This form of pharmacy practice must be thoroughly researched to examine the impact on the existing health care services now available on Guam: economically and competitively on future health professionals who are preparing to return to Guam to practice their profession
11. Have you read the GBEP draft telepharmacy rules? Yes. There is a need to revisit the rules with more emphasis on the "need" for telepharmacy and not just because it is technologically available.
12. Can telepharmacy provide an increase in accessibility of pharmacy services to our island citizens? No. Guam has adequate availability of pharmacies throughout the island.
13. Should telepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? No.
14. Should telepharmacy be limited to a certain mile radius of an on-site pharmacy?
15. Should GBEP rules limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius? (10miles? 20miles?). Yes.
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? Yes.
17. Should telepharmacy be limited to licensed pharmacists physically in Guam? Yes
18. Should the Board have authority to approve or disapprove application based on location of the remote-site? Yes

19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20. How will telepharmacy impact Guam and its people? Pharmacy services includes the direct one on one contact of the Pharmacist and patient when counseling is done. Most patients expect this type of service from our pharmacist. Also telepharmacy is not a service that is needed on Guam. We have pharmacies practically all over the island. This will discourage many of our aspiring young students from our island interested in pharmacy to change their minds. I feel the economic impact will affect pharmacies now currently operating in our island. Bottom line, telepharmacy is great technology but should be applied only to underserved areas in the U.S. mainland.

Thank you.

Comments/concerns/suggestions: _____

4/7/16

ATTN: Guam Board of Pharmacy
RE: Concerns regarding Telepharmacy / Remote Order Entry by Pharmacist

Here are some things to possibly consider regarding Telepharmacy:

1) Hawaii law has a requirement that in order to allow for telepharmacy to operate in an area, there has to be zero or no established pharmacies in a 5 mile radius for that area. Should Guam have some type of realistic physical boundary as part of the regulation?

2) Just as we need to update our license every 2 years, should some type of yearly renewal assessment be done to hold some accountability for the need of telepharmacy? Or to just simply make sure that requirements are kept (should there be any)? Or for the Board to have some participation via inspection?

3) Should there be a way for pharmacy/hospitals and other areas to preferentially hire local pharmacists first, via job announcements for a certain time period, then if no response is given by that time period, then that establishment may reach out elsewhere via telepharmacy? This maybe done for every new pharmacy job position so as to instill job security for our Guam residents.

These are some of the things to think about and I am sure there are many more concerns. I am thankful for your time in listening to some of my concerns. It is great to embrace the future by building a bridge using technology to advance our pharmacy profession. I am honored to be a part of this history-in-the-making in Guam.

Sincerely,

Margaret Kang, Pharm.D.

4/7/16

ATTN: Guam Board of Pharmacy
RE: Concerns regarding Telepharmacy / Remote Order Entry by Pharmacist

Here are some things to possibly consider regarding Telepharmacy:

1) Hawaii law has a requirement that in order to allow for telepharmacy to operate in an area, there has to be zero or no established pharmacies in a 5 mile radius for that area. Should Guam have some type of realistic physical boundary as part of the regulation?

2) Just as we need to update our license every 2 years, should some type of yearly renewal assessment be done to hold some accountability for the need of telepharmacy? Or to just simply make sure that requirements are kept (should there be any)? Or for the Board to have some participation via inspection?

3) Should there be a way for pharmacy/hospitals and other areas to preferentially hire local pharmacists first, via job announcements for a certain time period, then if no response is given by that time period, then that establishment may reach out elsewhere via telepharmacy? This maybe done for every new pharmacy job position so as to instill job security for our Guam residents.

These are some of the things to think about and I am sure there are many more concerns. I am thankful for your time in listening to some of my concerns. It is great to embrace the future by building a bridge using technology to advance our pharmacy profession. I am honored to be a part of this history-in-the-making in Guam.

Sincerely,

Margaret Kang, Pharm.D.

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? NO, we have enough pharmacy/pharmacist on islo
2.Do you feel telepharmacy can be practiced safely? Maybe
3.Do you feel comfortable with the technological aspects of telepharmacy? NO
4.Is Guam underserved? No
5.Is Guam short of pharmacists? NO
6.Is Guam short of pharmacies? NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? ~~No~~ Yes
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? Yes, 200 + patients
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11.Have you read the GBEP draft telepharmacy rules? NO
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? No, we have enough pharmacy. What we need is a 24hrs retail pharmo
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? No,
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? Yes
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) Yes
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? Yes
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? Yes
18.Should Board have authority to approve or disapprove application based on location of the remote-site? Yes
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20.How will telepharmacy impact Guam and its people? It could affect Guam economically, and it's people; pharmacist might have less opportunities in here. :)

Comments/concerns/suggestions:
if application is approved; I suggest that we have strict laws to follow.

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? ~~for~~ patients to have access to Rx services ea
2.Do you feel telepharmacy can be practiced safely? Yes w/ after hrs proper policies & procedures in pla
3.Do you feel comfortable with the technological aspects of telepharmacy? Sure w/ strict compli
4.Is Guam underserved? to P & P for patients s
5.Is Guam short of pharmacists? Yes
6.Is Guam short of pharmacies? No
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? No. Retail can access/pro
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? Telephon if a ne
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? No is ne
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11.Have you read the GBEP draft telepharmacy rules? No
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? Yes
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? Yes
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? Yes, say 5-10 mile radius
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) 5 - 10 mile radius
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? 1:1 is appropriate/reasonable
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? Yes
18.Should Board have authority to approve or disapprove application based on location of the remote-site? Yes based on rules in place & already approved.
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes, subject to review & approval
20.How will telepharmacy impact Guam and its people?
It will improve pts access to Rx care/therapy/pt's compliance to therapy and better outcomes = overall improved QOL

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? No, Not seem to be necessary
2. Do you feel telepharmacy can be practiced safely? Yes (probably Not IN Guam)
3. Do you feel comfortable with the technological aspects of telepharmacy? Not really
4. Is Guam underserved? Yes
5. Is Guam short of pharmacists? Yes
6. Is Guam short of pharmacies? NO
7. Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? Yes
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? Yes
9. Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? Yes
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11. Have you read the GBEP draft telepharmacy rules? NO
12. Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? Yes
13. Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? Sure
14. Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? Yes
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) Yes (10 miles)
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? Sure
17. Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? Yes
18. Should Board have authority to approve or disapprove application based on location of the remote-site? Yes
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20. How will telepharmacy impact Guam and its people? May help out for remote areas

Comments/concerns/suggestions: _____

_____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Mar 07 2016 04:11 pm FAX

Please fill out survey, fax back to 649-2724

Thank You!

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? We don't need it.
2. Do you feel telepharmacy can be practiced safely? not safe at all.
3. Do you feel comfortable with the technological aspects of telepharmacy? no.
4. Is Guam underserved? no
5. Is Guam short of pharmacists? no
6. Is Guam short of pharmacies? no
7. Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? ~~yes~~ no. not even hospitals
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? no
9. Shouldtelepharmacy be limited to Government entities (DOC, DYA, ~~Mental Health~~, ~~DPHSS~~)?
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? well,
11. Have you read the GBEP draft telepharmacy rules? yes.
12. Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? not really
13. Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? not really.
14. Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy?
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?)
16. Should it be limited to 1 remote site per 1 off-site telepharmacy?
17. Shouldtelepharmacy be limited to licensed pharmacists physically in Guam?
18. Should Board have authority to approve or disapprove application based on location of the remote-site?

No comment

19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? yes.
20. How will telepharmacy impact Guam and its people? The need for retail pharmacy will be limited.

Comments/concerns/suggestions: We are not isolate island ~~or~~ remote no pharmacist wants to come.

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? NO NOT NEED yet maybe in the future...
2. Do you feel telepharmacy can be practiced safely? NO
3. Do you feel comfortable with the technological aspects of telepharmacy? NO
4. Is Guam underserved? NO
5. Is Guam short of pharmacists? Yes
6. Is Guam short of pharmacies? No
7. Should telepharmacy be limited only to hospitals (i.e. GMH, GRMC)? NO
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? NO
9. Should telepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11. Have you read the GBEP draft telepharmacy rules? NO
12. Can telepharmacy provide an increase in accessibility of pharmacy services to our island citizens? NO
13. Should telepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? NO
14. Should telepharmacy be limited to a certain mile radius of an onsite pharmacy? NO
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) NO
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? NO
17. Should telepharmacy be limited to licensed pharmacists physically in Guam? Yes
18. Should Board have authority to approve or disapprove application based on location of the remote-site? Yes
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20. How will telepharmacy impact Guam and its people? Let's wait & see...

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? Yes, because our hours are limited
2. Do you feel telepharmacy can be practiced safely? If everyone involved is involved
3. Do you feel comfortable with the technological aspects of telepharmacy? Not really
4. Is Guam underserved? Not Really.
5. Is Guam short of pharmacists? Yes
6. Is Guam short of pharmacies? No
7. Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? No
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? No
9. Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)?
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11. Have you read the GBEP draft telepharmacy rules? Not really
12. Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? Yes
13. Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? Yes
14. Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy?
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) Yes
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? Yes
17. Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? Yes
18. Should Board have authority to approve or disapprove application based on location of the remote-site? Yes
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20. How will telepharmacy impact Guam and its people? I think it would help everyone here on Guam get the medicines they need in a timely matter. They wouldn't have to wait til this pharmacy opened for business

Comments/concerns/suggestions: _____

_____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? Yes, we don't have enough pharmacist on island.
2. Do you feel telepharmacy can be practiced safely? - Probably not.
3. Do you feel comfortable with the technological aspects of telepharmacy? - maybe
4. Is Guam underserved? - Yes
5. Is Guam short of pharmacists? - Yes
6. Is Guam short of pharmacies? - no
7. Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? - No
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? - No
9. Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? - No
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? - Yes,
11. Have you read the GBEP draft telepharmacy rules? - Not Really
12. Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? - Yes
13. Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? - Yes,
14. Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? - Yes
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) 20 miles.
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? - Yes at the beginning
17. Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? - No
18. Should Board have authority to approve or disapprove application based on location of the remote-site? - No
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? - Yes
20. How will telepharmacy impact Guam and its people? - N/A.

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? no
2.Do you feel telepharmacy can be practiced safely? not sure
3.Do you feel comfortable with the technological aspects of telepharmacy? no
4.Is Guam underserved? no
5.Is Guam short of pharmacists? no
6.Is Guam short of pharmacies? no
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? yes
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? yes 200 beds
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? yes
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? yes
11.Have you read the GBEP draft telepharmacy rules? No
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? No
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? yes
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? yes
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) yes
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? yes
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? no
18.Should Board have authority to approve or disapprove application based on location of the remote-site? yes
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? yes
20.How will telepharmacy impact Guam and its people? a lot of pharmacist & technician lost their job

Comments/concerns/suggestions: we dont need telepharmacy here in guam

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? NO, I believe we are not yet ready w this type of remote dispensing
2.Do you feel telepharmacy can be practiced safely? NO
3.Do you feel comfortable with the technological aspects of telepharmacy? NO
4.Is Guam underserved? NO
5.Is Guam short of pharmacists? YES
6.Is Guam short of pharmacies? NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? YES
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? YES
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? YES
11.Have you read the GBEP draft telepharmacy rules? YES
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? NO
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? YES
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? YES
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) YES
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? YES
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? YES
18.Should Board have authority to approve or disapprove application based on location of the remote-site? YES
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? YES
20.How will telepharmacy impact Guam and its people? THE ACCESSABILITY OF MEDICATIONS WILL BE INCREASED BUT THE SAFETY ISSUES MUST BE ADDRESSED AS WELL.

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

04/02/2016 SAT 8:32 FAX 001/001
04/04/2016 MON 11:21 FAX 6483978 Expressmail 001/001

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? NO
2.Do you feel telepharmacy can be practiced safely? NO
3.Do you feel comfortable with the technological aspects of telepharmacy? NO
4.Is Guam underserved? NO
5.Is Guam short of pharmacists? NO
6.Is Guam short of pharmacies? NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? YES
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? YES
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? YES
11.Have you read the GBEP draft telepharmacy rules? YES
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? NO
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? NO
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? YES
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) YES
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? YES
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? YES
18.Should Board have authority to approve or disapprove application based on location of the remote-site? YES
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? YES
20.How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: LIMIT TELEPHARMACY IN GUAM TO HOSPITAL ONLY

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? NO, Guam have about 40+ pharmacies P population wise, local pharmacies are able to cater Patients needs
2.Do you feel telepharmacy can be practiced safely? yes
3.Do you feel comfortable with the technological aspects of telepharmacy? yes
4.Is Guam underserved? NO
5.Is Guam short of pharmacists? NO
6.Is Guam short of pharmacies? NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? YES
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? YES
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? YES
11.Have you read the GBEP draft telepharmacy rules? YES
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? YES
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? Yes
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? YES
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? (20miles?))
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? YES
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? YES
18.Should Board have authority to approve or disapprove application based on location of the remote-site? YES
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? YES
20.How will telepharmacy impact Guam and its people? With the current population P local pharmacies heard here are taken cared of. Telepharmacy will eventually implemented P not guidelines decided with Rules P provision that will protect local pharmacies P pharmacist, then most of us will be out of job.

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam? Why? No, We're not underserved.
2.Do you feel telepharmacy can be practiced safely? I have some doubts.
3.Do you feel comfortable with the technological aspects of telepharmacy? Somewhat
4.Is Guam underserved? No
5.Is Guam short of pharmacists? No, Too many pharmacy, yes
6.Is Guam short of pharmacies? No
7.Should telepharmacy be limited only to hospitals (i.e. GMH, GRMC)? Yes
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? 200 plus beds only.
9.Should telepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? Yes
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes. There is no urgent public need.
11.Have you read the GBEP draft telepharmacy rules? not all.
12.Can telepharmacy provide an increase in accessibility of pharmacy services to our island citizens? Maybe?
13.Should telepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? Hospitals, maybe.
14.Should telepharmacy be limited to a certain mile radius of an onsite pharmacy? Yes
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) Ye
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? Yes
17.Should telepharmacy be limited to licensed pharmacists physically in Guam? Yes
18.Should Board have authority to approve or disapprove application based on location of the remote-site? Yes
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes.
20.How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? – no
2.Do you feel telepharmacy can be practiced safely? no
3.Do you feel comfortable with the technological aspects of telepharmacy? no
4.Is Guam underserved? no
5.Is Guam short of pharmacists? yes
6.Is Guam short of pharmacies? no
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? yes
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? yes
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? no
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? yes
11.Have you read the GBEP draft telepharmacy rules? – yes
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? no
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? no
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? yes
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) yes
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? yes
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? yes
18.Should Board have authority to approve or disapprove application based on location of the remote-site? yes
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? yes
20.How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: Lawrence Gabriel

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? No
2. Do you feel telepharmacy can be practiced safely? No
3. Do you feel comfortable with the technological aspects of telepharmacy? No
4. Is Guam underserved? No
5. Is Guam short of pharmacists? Yes
6. Is Guam short of pharmacies? No
7. Should telepharmacy be limited only to hospitals (i.e. GMH, GRMC)? Yes
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? No
9. Should telepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? No
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11. Have you read the GBEP draft telepharmacy rules? Yes
12. Can telepharmacy provide an increase in accessibility of pharmacy services to our island citizens? No
13. Should telepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? No
14. Should telepharmacy be limited to a certain mile radius of an onsite pharmacy? Yes
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) Yes
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? Yes
17. Should telepharmacy be limited to licensed pharmacists physically in Guam? Yes
18. Should Board have authority to approve or disapprove application based on location of the remote-site? Yes
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20. How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: _____

_____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? - NO
2.Do you feel telepharmacy can be practiced safely? - NO
3.Do you feel comfortable with the technological aspects of telepharmacy? - NO
4.Is Guam underserved?- NO
5.Is Guam short of pharmacists? -YES
6.Is Guam short of pharmacies? - NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)?-YES
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? -YES
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)?- NO
10.Do we need more time to adequately research telepharmacy and consider the implications - this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? YES
11.Have you read the GBEP draft telepharmacy rules? YES
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? NO
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? -NO
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy?- YES
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) YES
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? YES
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? YES
18.Should Board have authority to approve or disapprove application based on location of the remote-site? YES
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? YES
20.How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: _____

_____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? NO
2.Do you feel telepharmacy can be practiced safely? NO
3.Do you feel comfortable with the technological aspects of telepharmacy? NO
4.Is Guam underserved? NO
5.Is Guam short of pharmacists? YES
6.Is Guam short of pharmacies? NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? YES
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? YES
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? YES
11.Have you read the GBEP draft telepharmacy rules? YES
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? NO
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? NO
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? YES
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) YES
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? YES
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? YES
18.Should Board have authority to approve or disapprove application based on location of the remote-site? YES
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? YES
20.How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? NO, BECAUSE WE ARE NOT UNDER-SERVED
2.Do you feel telepharmacy can be practiced safely? NO
3.Do you feel comfortable with the technological aspects of telepharmacy? NO
4.Is Guam underserved? NO
5.Is Guam short of pharmacists? NO
6.Is Guam short of pharmacies? NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? YES
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? YES
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? NO
11.Have you read the GBEP draft telepharmacy rules? YES
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? NO
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? NO
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? NO
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) NO
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? NO
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? YES
18.Should Board have authority to approve or disapprove application based on location of the remote-site? YES
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? YES
20.How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: LIMIT TELEPHARMACY TO HOSPITAL

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? NO
2.Do you feel telepharmacy can be practiced safely? Maybe → NO
3.Do you feel comfortable with the technological aspects of telepharmacy? NO
4.Is Guam underserved? ?
5.Is Guam short of pharmacists? Yes
6.Is Guam short of pharmacies? NO maybe
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? N/A
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? NO
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? NO
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11.Have you read the GBEP draft telepharmacy rules? Yes
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? Not necessarily
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? Maybe
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? NO
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) Maybe
16.Should it be limited to 1 remote site per 1 off-site telepharmacy?
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? Maybe
18.Should Board have authority to approve or disapprove application based on location of the remote-site? Sure
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20.How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? No Not on retail pharmacy - Retail pharmacies are accessible to people of Guam
2. Do you feel telepharmacy can be practiced safely?
3. Do you feel comfortable with the technological aspects of telepharmacy? Need more patients
4. Is Guam underserved? No
5. Is Guam short of pharmacists? No
6. Is Guam short of pharmacies? NO
7. Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? Yes
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? yes
9. Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? yes
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? yes
11. Have you read the GBEP draft telepharmacy rules? yes
12. Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? No
13. Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? yes
14. Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? yes
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) yes
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? yes
17. Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? yes
18. Should Board have authority to approve or disapprove application based on location of the remote-site? yes
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? yes
20. How will telepharmacy impact Guam and its people? Guam is only a small - 14 local pharmacies can provide a delivery good quality care to patients in case of patient pharmacist interaction

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? No, because Guam is NOT underserved
2.Do you feel telepharmacy can be practiced safely? Maybe
3.Do you feel comfortable with the technological aspects of telepharmacy? No
4.Is Guam underserved? No
5.Is Guam short of pharmacists? No
6.Is Guam short of pharmacies? No
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? I don't know (not sure)
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? I don't know
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? Maybe
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Yes
11.Have you read the GBEP draft telepharmacy rules? Yes
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? Yes, on Southern part of Guam (UMATAC + MERIZO)
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? Yes
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? Yes
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) Yes
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? Yes
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? Yes
18.Should Board have authority to approve or disapprove application based on location of the remote-site? Yes
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20.How will telepharmacy impact Guam and its people? It will affect local pharmacy business

Comments/concerns/suggestions: Retail pharmacy can provide all the services. Guam is only small island, we don't need Telepharmacy law.

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? NO, Because Guam is not underserved
2.Do you feel telepharmacy can be practiced safely? NO
3.Do you feel comfortable with the technological aspects of telepharmacy? NO
4.Is Guam underserved? NO
5.Is Guam short of pharmacists? NO
6.Is Guam short of pharmacies? NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? yes
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? yes
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)?
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? yes
11.Have you read the GBEP draft telepharmacy rules? yes
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? NO
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? yes
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? yes
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) yes
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? yes
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? yes
18.Should Board have authority to approve or disapprove application based on location of the remote-site? yes
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? yes.
20.How will telepharmacy impact Guam and its people?

Comments/concerns/suggestions: It will affect the retail pharmacy in Guam

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

APR-05-2016 05:58 PM AdventistGuamClinic -> Job# 288214 Page 2 / 2
04/02/2016 12:03:07 PM AdventistGuamClinic -> Job# 288214 Page 2 / 2
04/02/2016 SAT 12:01 FAX 002/002

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? NO
2.Do you feel telepharmacy can be practiced safely? NO
3.Do you feel comfortable with the technological aspects of telepharmacy? NO
4.Is Guam underserved? NO
5.Is Guam short of pharmacists? NO
6.Is Guam short of pharmacies? NO
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? MAYBE
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? NO
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? MAYBE
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? YES
11.Have you read the GBEP draft telepharmacy rules? YES
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? NO
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? NO
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? YES
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) YES
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? YES
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? MAYBE
18.Should Board have authority to approve or disapprove application based on location of the remote-site? YES!
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? YES
20.How will telepharmacy impact Guam and its people? —

Comments/concerns/suggestions: Retail Pharmacy can provide all the patients needs.

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1. Do we need telepharmacy on Guam? Why? No, Not underserved
2. Do you feel telepharmacy can be practiced safely? Yes
3. Do you feel comfortable with the technological aspects of telepharmacy? No
4. Is Guam underserved? Not in Central, Maybe in South
5. Is Guam short of pharmacists? No
6. Is Guam short of pharmacies? Not in Central, Maybe in South
7. Should telepharmacy be limited only to hospitals (i.e. GMH, GRMC)? I don't know
8. Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? I don't know
9. Should telepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? I don't know
10. Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? Transparency + Research time Yes
11. Have you read the GBEP draft telepharmacy rules? No
12. Can telepharmacy provide an increase in accessibility of pharmacy services to our island citizens? In the South Yes, In Central it will saturate and close businesses from overcompetitr
13. Should telepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? Yes
14. Should telepharmacy be limited to a certain mile radius of an onsite pharmacy? Yes
15. Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) Yes
16. Should it be limited to 1 remote site per 1 off-site telepharmacy? I don't know
17. Should telepharmacy be limited to licensed pharmacists physically in Guam? I don't know
18. Should Board have authority to approve or disapprove application based on location of the remote-site? Yes
19. Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? Yes
20. How will telepharmacy impact Guam and its people? It can help underserved in South
It will hurt Central + North
It will negate tax revenue for local govt by closing local businesses

Comments/concerns/suggestions: _____

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

Telepharmacy Survey

1.Do we need telepharmacy on Guam?Why? No, Because Guam is not underserved
2.Do you feel telepharmacy can be practiced safely? No
3.Do you feel comfortable with the technological aspects of telepharmacy? No
4.Is Guam underserved? No
5.Is Guam short of pharmacists? No
6.Is Guam short of pharmacies? No
7.Shouldtelepharmacy be limited only to hospitals (i.e. GMH, GRMC)? Yes
8.Should it be limited to hospitals with certain minimum bed capacities (i.e. 100 or 200 patient beds)? yes
9.Shouldtelepharmacy be limited to Government entities (DOC, DYA, Mental Health, DPHSS)? maybe
10.Do we need more time to adequately research telepharmacy and consider the implications this may have for Guam (our patients, the practice of pharmacy, our local pharmacists, and our local pharmacies)? yes
11.Have you read the GBEP draft telepharmacy rules? No
12.Cantelepharmacy provide an increase in accessibility of pharmacy services to our island citizens? yes, South part of Guam
13.Shouldtelepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed? yes
14.Shouldtelepharmacy be limited to a certain mile radius of an onsite pharmacy? yes
15.Limit operation of telepharmacy to areas of no open pharmacy within a certain mile radius (10miles? 20miles?) yes
16.Should it be limited to 1 remote site per 1 off-site telepharmacy? yes
17.Shouldtelepharmacy be limited to licensed pharmacists physically in Guam? yes
18.Should Board have authority to approve or disapprove application based on location of the remote-site? yes
19.Do you agree pharmacists and other stakeholders should contribute to the formulation of good laws and rules that enhance healthcare in Guam? yes
20.How will telepharmacy impact Guam and its people? It affect Local Pharmacy Business in Guam Boards + Training area.

Comments/concerns/suggestions: Limit Telepharmacy to underserved area in Guam

Please kindly submit completed survey to GPhA by Tuesday April 5, 2016

1) Do we need telepharmacy on Guam? Why?

Guam does NOT need telepharmacy as we are NOT underserved. The only reason this is being brought to the board is by a private company, Cardinal under the guise of the new Hospital needing third shift pharmacist for coverage.

The new hospital is NOT recruiting pharmacists for their third shift. The pharamacists currently on Guam are willing to cover on call to assist the hospital

The purspose of this rouge is to take over retail pharmacies on Guam.

If we allow this, there will not be a need for many pharmacists on Guam.

2) Do you feel that telepharmacy can be practices safely on Guam?

When I was Clinic Administrator at FHP, the pharmacy reported to me. We had issues of safe practice WITH the pharmacist present, due to high volume and long hours, so absolutely NO.

3) Do you feel comfortable with the technological aspects of telepharmacy?

I am not experienced in this area and cannot comment.

4) Is Guam underserved?

Absolutely NOT

5) Is Guam short of Pharmacists?

No

6) Is Guam short of Pharmacies?

No

7) Should telepharmacy be limited only to hospitals?

If we must for some reason acquiesce and allow telepharmacy then yes we must limit it to hospital and maybe public health, and limit to one location per hospital and limit to the telepharmacy being located on Guam.

8) Should it be limited to hospitals with certain bed capacities?

Absolutely, there are 5 bed hospitals in USA. any retail operation in the states could open a "specialty hospital". It must be an ACUTE CAREhospital, with ER over 125 beds.

9) Should telepharmacy be limited to Government entities.

No, if we write the proper rules private hospitals should not be discriminated against.

10) So we need more time to adequately research telepharmacy and consider its implications?

Absolutely, there is no reason for the Pharmacy Board to NOT allow the time as they represent the Pharmacists on Guam and we as an organization represent the same stakeholders. There can be no HONEST reason for NOT giving the people who would be most affected buy this major decision time.

11) Have you read the GBEP rules?

Yes and it seems like it was submitted by the new Hospital, written by Cardinal Health, i.e. Cardinal Health attorneys talking to our Assistant AG.

12) Can telepharmacy provide an increase in accessibility of pharmacy services to our island citizens?

NO I am not aware of any Guam citizen NOT being able to get a prescription due to inability to find a pharmacy.

13) Should telepharmacy be allowed in order to provide pharmacy services when all other local pharmacies are closed?

No who would fill the prescription anyway ?? If an emergency then go to ER

14) Should telepharmacy be limited to a certain mile radius of an onsite pharmacy?

Yes

15) Limit operation of Telepharmacies to areas of no open pharmacies within a certain mile radius?

Yes 10 miles

16) Should it be limited to 1 remote site per off-site telepharmacy.

Absolutely

17) Should telepharmacy be limited to licensed pharmacists physically on Guam.

YES Otherwise we will be invaded by mainland activity. This does, however not preclude the fact that Cardinal would bring some pharmacist here.

18) Should Board have authority to approve or disapprove application based on location of the remote site?

No As a matter of fact I would like to see a referendum voted on by all licensed Pharmacist who are currently physically on Guam to decide this issue, to insure that there are no future conflicts of interest of the Board members. Who better than our own Guam based practicing Pharmacist are more qualified to make this decision....

19) Do you agree pharmacists and other stakeholders should contribute to the formation of good laws and rules that enhance healthcare on Guam?

YES

20) How will telepharmacy impact Guam and its people?

a) It will be the end of retail pharmacy as we know it

b) The personal relationship that our wonderful citizens have with their Pharmacists will disappear.

c) Errors will occur

d) There will be drug interactions and unfortunate health outcomes as a result of this.

In conclusion, the concept of Telepharmacy is a good concept and has its place in our healthcare system, FOR UNDERSERVED AREAS, However when it is used as a bait and switch tactic for a private company to take over retail Pharmacies that will result in the reduction of Pharmacists, this is wrong and is NOT very Guamanian.

Just one old Administrator's comments.

Respectfully submitted,

Rick Schnitzer

Dear GPhA Members,

We would like to encourage everyone to actively participate in another stakeholders' meeting or working session on April 6, at 6:30pm, the venue to be announced.

On this meeting, Dr. Melissa Gabriel of GRMC will conduct an informative presentation about Telepharmacy, and Q&A to follow after presentation.

Kindly submit completed Telepharmacy survey to GPhA by Tuesday, April 5.

Please feel free to contact the following GPhA Officers and Board of Directors for additional information.

Cheryl 632-8100

Karen- 646-6183

Mildred - 646-4827

Jean - 649-9400

Thank you,

GPhA Officers and Board of Directors

Heather Narcis

From: Lourdes Phillips <lourdes.phillips64@gmail.com>
Sent: Saturday, March 26, 2016 4:13 PM
To: SUPERDRUG DEDEDO
Cc: Jerry Caruso; Heather Narcis; Rob Weinberg; Maggie Greenwood; Angie Eustaquio; Marlene M. Carbullido
Subject: Re: GPhA letter - two versions

Hi All,

Thank goodness we have legal counsel to assist us....I understand that other corporations that Rick may or may not be consulting with would also like to provide public comment by the April 7th meeting. I recommended putting their comments in writing and email to Heather.

Vangie

Sent from my iPhone

On Mar 26, 2016, at 3:15 PM, SUPERDRUG DEDEDO <sddededo@paylessmarkets.com> wrote:

> TO ALL:
>
> Thursday I got a visit from Richard "Rick" Schnitzer who is a consultant with a group of pharmacies here on Guam. He came to express concern about the way our proposed Telepharmacy Rules and Regs are written. His thoughts were that the Board was leaving the telepharmacy field open to any and all comers who might want to do business on Guam. He expressed his concern that a large corporation, such as Cardinal, would be able to service all pharmacies and clinics which would put all current pharmacies and pharmacists on Guam out of business!
>
> Knowing this should help us to explain the accurate and true interpretation of the proposed Rules and Regs. I'm sure he is not completely conversant with all the laws, rules and regulations governing the practice of pharmacy on Guam. Knowing this should also help us to explain what is possible or not possible with current and proposed changes in the law.
>
> I hope this explanation helps everyone to understand where he and the Association are coming from.
>
> Jerry
>
> **From:** Lourdes Phillips [mailto:lourdes.phillips64@gmail.com]
> **Sent:** Friday, March 25, 2016 5:50 PM
> **To:** Jerry Caruso
> **Cc:** Heather Narcis; Rob Weinberg; sddededo@paylessmarkets.com; Maggie Greenwood; Angie Eustaquio; Marlene Carbullido
> **Subject:** Re: GPhA letter - two versions
>
> Thank you,Jerry.

Doc. No. 34GL-17-0220.*CD

I'm glad that GPhA has an extra week. I agree that they need to better organize the information because the letter they faxed to Fhp says something different than the letter they provided to other pharmacies. Very odd. Did anyone ask Karen Song or Cheryl Marimla why the GPhA sent out two different letters to members?

Vangie

Sent from my iPhone

On Mar 25, 2016, at 4:36 PM, Jerry Caruso <jcaruso@guam.net> wrote:

> To All:
>
> I spoke Cheryl Marimla yesterday (Thursday, March 24th) to let her know that the Board would allow GPhA to take and additional week to express there concerns in writing. She was thankful for that extra time.
>
> After looking at the 3 letters it is apparent to me that they need to be better organised. So I called Cheryl again and asked her to get everyone together and present a single unified writteh request with all their comments compiled together. She said that they planned to hold an early morning meeting on Tuesday the 29th to that end.
>
> Hopefully, they will be better organized by the 31st.
>
> Jerry
>
> > From: Heather.Narcis@dphss.guam.gov
> > To: rweinberg@guamag.org; lourdes.phillips64@gmail.com
> > CC: jcaruso@guam.net; sddededo@paylessmarkets.com; maggierunner@hotmail.com; eustaquioam@gmail.com; Marlene.Carbullido@dphss.guam.gov
> > Subject: RE: GPhA letter - two versions
> > Date: Fri, 25 Mar 2016 00:59:37 +0000
> >
> > All,
> >
> > Please see attached clearer, scanned copies of the documents delivered concerning comments and questions on Telepharmacy Draft.
> >
> >
> > Best Regards,
> >
> > Heather A. Narcis
> > Clerk III
> > Department of Public Health & Social Services
> > Division of General Management
> > Health Professional Licensing Office/EMS Office
> > 123 Chalan Kareta
> > Mangilao, Guam 96913

> Tel: (671) 735-7408
> Email: heather.narcis@dphss.guam.gov
> ********** CONFIDENTIALITY NOTICE **********
> The Department of Public Health and Social Services is an equal opportunity employer and provider. This e-mail and any attachments are intended only for the individual or company to which it is addressed and may contain information which is privileged, confidential and prohibited from disclosure or unauthorized use under applicable law. If you are not the intended recipient of this e-mail, you are hereby notified that any use, dissemination, or copying of this e-mail or the information contained in the e-mail is strictly prohibited by the sender. If you have received this transmission in error, please return the material received to the sender heather.narcis@dphss.guam.gov
>
>
> -----Original Message-----
> From: Rob Weinberg [mailto:rweinberg@guamag.org]
> Sent: Friday, March 25, 2016 10:38 AM
> To: Lourdes Phillips <lourdes.phillips64@gmail.com>
> Cc: Jerry Caruso <jcaruso@guam.net>; Superdrug Dededo <sddededo@paylessmarkets.com>; Maggie Greenwood <maggierunner@hotmail.com>; Angie Eustaquio <eustaquioam@gmail.com>; Marlene M. Carbullido <Marlene.Carbullido@dphss.guam.gov>; Heather Narcis <Heather.Narcis@dphss.guam.gov>
> Subject: RE: GPhA letter - two versions
>
> Substantively, they're pretty much the same. One has only two signatures. The other is cut off so we can't tell if it's really from the whole GPhA or just a few. The longer of the two has a suggestion missing from the other.
>
> But how were these delivered? To whom?
>
> Anyway, the Board can invite them to attend the next board meeting if you all like, since you'll be discussing comments/suggestions received at that time.
>
> Robert M. Weinberg
> Assistant Attorney General
> Office of the Attorney General
> 590 S. Marine Corps Drive
> Suite 706, ITC Building
> Tamuning, Guam 96913
> (671) 475-3324 ext. 3095 (o)
> (671) 687-7720 (cell)
>
> CONFIDENTIALITY NOTICE: This email and any files transmitted with it may be legally privileged and confidential and is intended solely for the use of the individual(s) or entity(ies) named above. If you are not the intended recipient, please be advised that any review, dissemination or copying of this email, or taking any action in reliance on the contents of this information is strictly prohibited. If you received this transmission in error, please notify me immediately by email or telephone to arrange for the return of this email and any files or to verify it has been deleted from your system. Thank you for your

cooperation.
>
>
>
> -----Original Message-----
> From: Lourdes Phillips [mailto:lourdes.phillips64@gmail.com]
> Sent: Friday, March 25, 2016 10:33 AM
> To: Rob Weinberg
> Cc: Jerry Caruso; Superdrug Dededo; Maggie Greenwood; Angie Eustaquio; Marlene Carbullido; Heather Narcis
> Subject: Re: GPhA letter - two versions
>
> The concern is the letters contain different information.
>
> Sent from my iPhone
>
> > On Mar 25, 2016, at 10:30 AM, Rob Weinberg <rweinberg@guamag.org> wrote:
> >
> > I'm re-sending them to everyone here in .pdf format so that everyone can see them. The .jpg format they were scanned in is very hard to read.
> >
> > Where did these come from? How and to whom were they delivered? Procedurally, we need to properly document incoming comments such as these.
> >
> > Substantively, the comments look worth considering. Perhaps it's a question of definitions, but is telepharmacy something that needs to be limited to hospitals, i.e., GMHA and GRMC? What about the clinics and other locales from which doctors prescribe?
> >
> > What is it that is "concerning"? That they're claiming they need more time? It was a tad rushed, but all within the AAL requirements. Plus, that's the reason for keeping the record open, so that people would have time past the public hearing to comment. Or is the concern the actual substance of the comments?
> >
> > ~Rob
> >
> > Robert M. Weinberg
> > Assistant Attorney General
> > Office of the Attorney General
> > 590 S. Marine Corps Drive
> > Suite 706, ITC Building
> > Tamuning, Guam 96913
> > (671) 475-3324 ext. 3095 (o)
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>> Sent: Friday, March 25, 2016 9:31 AM
>> To: Jerry Caruso; Superdrug Dededo; Maggie Greenwood; Angie Eustaquio; Rob Weinberg; Marlene Carbullido; Heather Narcis
>> Subject: GPhA letter - two versions
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>>
>> Vangie
>>
>> <FullSizeRender.pdf>
>> <IMG_3484.pdf>
>> <IMG_3483.pdf>

Heather Narcis

From:	Lourdes Phillips <lourdes.phillips64@gmail.com>
Sent:	Friday, March 25, 2016 5:50 PM
To:	Jerry Caruso
Cc:	Heather Narcis; Rob Weinberg; sddededo@paylessmarkets.com; Maggie Greenwood; Angie Eustaquio; Marlene M. Carbullido
Subject:	Re: GPhA letter - two versions

Thank you,Jerry.

I'm glad that GPhA has an extra week. I agree that they need to better organize the information because the letter they faxed to Fhp says something different than the letter they provided to other pharmacies. Very odd. Did anyone ask Karen Song or Cheryl Marimla why the GPhA sent out two different letters to members?

Vangie

Sent from my iPhone

On Mar 25, 2016, at 4:36 PM, Jerry Caruso <jcaruso@guam.net> wrote:

> To All:
>
> I spoke Cheryl Marimla yesterday (Thursday, March 24th) to let her know that the Board would allow GPhA to take and additional week to express there concerns in writing. She was thankful for that extra time.
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> Hopefully, they will be better organized by the 31st.
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> Jerry
>
> > From: Heather.Narcis@dphss.guam.gov
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> > CC: jcaruso@guam.net; sddededo@paylessmarkets.com; maggierunner@hotmail.com; eustaquioam@gmail.com; Marlene.Carbullido@dphss.guam.gov
> > Subject: RE: GPhA letter - two versions
> > Date: Fri, 25 Mar 2016 00:59:37 +0000
> >
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> >
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>
> Best Regards,
>
> Heather A. Narcis
> Clerk III
> Department of Public Health & Social Services
> Division of General Management
> Health Professional Licensing Office/EMS Office
> 123 Chalan Kareta
> Mangilao, Guam 96913
> Tel: (671) 735-7408
> Email: heather.narcis@dphss.guam.gov
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Cc: sddededo@paylessmarkets.com; Maggie Greenwood; Angie Eustaquio; Marlene M. Carbullido
Subject: RE: GPhA letter - two versions

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Hopefully, they will be better organized by the 31st.

Jerry

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Attn: GBEP
from: Ken Lee (SDA)
c/o Karen

Hi Karen,

Please submit for me if you kindly could. Sorry for the trouble and thank you.

Ken

Sent from my iPhone

Hi Ken,
Thank you for your input. Will you forward this to GBEP by March 24th?
Or may we submit (what you wrote below) on your behalf with comments from the other members?
Please advise.

Karen

March 24, 2016

Dear members of the Board,

We would like to thank you for taking the time to consider that inputs of our members and other stakeholders in regards to the draft telepharmacy rules.

When the copy of the draft telepharmacy rules was first given to GPhA on March 5th, several working sessions/meetings were organized.

Those in attendance at these working sessions/meetings asked GPhA to request for an extension to GBEP on their behalf to allow more time to review the draft.

Although not granted, we thank you for your consideration on our request for an extension for public comment on this important telepharmacy rules.

Since our request for extension not granted, we would like to express our concerns on how telepharmacy may impact the practice of pharmacy on Guam and how it may impact our island citizens.

For the time being , we would like to kindly request for the following to be considered when finalizing the telepharmacy rules:

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For every item i.e. 22, 23, 24, 25, 27, 13112, 13112a, 13114a(2), 13115a, 13116d and 13116f to be changed to hospitals
Limit to one remote site per hospital
Approve rules for licensed pharmacists physically in Guam

May we again, request for more time to further discuss the implications that telepharmacy may have on Guam? Thank you for your consideration

Janet Cruz

Olivia Delapaz

Kristine Pabuayan

William Fresnedo

March 24, 2016

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Angelyn Tiu Demecina Castro

Cynthia A. Olivares Georginia Lalas-Guzman

Jaclyn R. Iyan Mary Jean R. Cabiloo

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Geraldine Mariano

MARICAR MATIC

MERLINDA MARIANO

Felisa M. Vitug-Esquivel

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Pharmacist

CpT

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REMEDIOS MACATUGAL _____ Jmacatugal Pharmacy Tech

Joly A. Aglibut, R Pharmacist _____ _____

Doris M. Quenimet
Doris Quenimet, RPh. _____ _____

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Minerva Termulo — Pharmacy Tech

Evelyn Pili — Pharmacy Tech

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ANEIA L. CARLOS

Pharmacist

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Marilyn H. Florendo, R.Ph

Vena C. Ayungao, CPhT

MARY ROSE CANOY, CPhT

Celia P. Navatilan, CPhT

Kristine Kaye Dinalga, CPhT

REY FLORENDO CPhT

WILHELMINO Y. CORDOBA R.PH

RECEIVED
MAR 24 2016
BOARDS

March 24, 2016

To: Guam Board of Examiners for Pharmacy

Re: Draft Telepharmacy Rules

Thank you for your consideration on our request for an extension on telepharmacy rules, although it is not approved. However, we respectfully request that the following items be added to the draft telepharmacy rules on April 7, 2016 meeting.

1. Title to be changed to Telepharmacy Rules for Hospitals
2. For every item i.e. 22, 23, 24, 25, 27, 13112, 13112a, 13114a(2), 13115a, 13116d and 13116f to be changed to hospitals.
3. Limit to one remote site per hospital.

Thank you for your consideration on this matter.

Sincerely,

Taesoo K. Lee Rph

Youngchoon Park Rph Y. Park

Mikk Younguk Jung

March 24, 2016

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Taesok Lee Rph

Yangcheon Park Rph Y. C Park

Mikki Younguk Jung

ATTN: Guam Board Examiners For Pharmacy

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Tania Z. Ramos

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Charisma Valencia

Joel Legislador

Mariket Mendoza

Janessa Barrogo

Karen P. Balajadia

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RICHARD SCHNITZER

CHARMAINE E. ECHON

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JANILL RAMOS

WILMA RAMOS

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DAISY B BUDUAN 3/24/16

EARLYNN B. RAGUINDIN

Aubrienne A. Barretto

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Mildred M. Gabriel, R-Ph. _____

Jonalyn J. Jazmin, CPhT. _____

Salleena Pablo, CPhT. _____

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[signature]	Pharmacist
Marietta D. Penagaje	Pharmacy Technician

03/24/2016 12:46 FAX 6716476126 GUAM REXALL DRUGS 003/003

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03/24/2016 12:52 FAX 6716476126 GUAM REXALL DRUGS 001/001

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Re: Draft Telepharmacy Rules

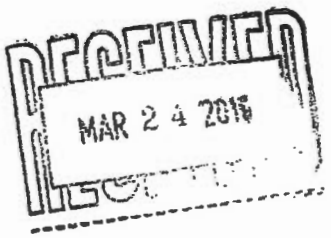
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KRISTINE S. FELICIANO 3/24/16 KATRINA BOLES 3/24/16

From: Kenneth W. Lee [mailto:klee@adventistclinic.com]
Sent: Thursday, March 17, 2016 6:57 PM
Subject: Re: March 24th deadline draft telepharmacy rules reg

Board Members, GPHA Officers, fellow GPHA members,
I am sorry I have not had a chance to attend any meetings nor look at the draft of the rule. I have only communicated with Karen over email about this impactful topic of telepharmacy.

I would respectfully like to suggest:
Could a similar point as Nevada's demographic rule be input, since it sounds like they are also favoring or protecting the place of live onsite pharmacists and reserving the telepharmacy for underserved areas. And Guam is not underserved like North Dakota and Idaho and Wyoming and these other places with no pharmacy for 50 mile radiuses so in this sense it is not the same need here as in these rural places where they have to drive an hour by interstate to get to civilization.
This is a different type of technology than the automation and other types that serve well in high volume settings or clinically cutting edge settings like university hospitals, it is technology that surfaced to fulfill a need for rural areas that local pharmacies were closing down due to the fact that it was not feasible to fund staff salaries for low volume stores within certain mile radius. And Guam must input this in their rule to isolate telepharmacy to that type of need. Yes, we currently don't have 24 hour service outpatient so if I may reiterate some kind of verbiage in the line of operation of telepharmacy limited to areas of no open pharmacy within certain mile radius (25 mile?)

Sincerely,
Kenneth Lee, PharmD
Seventh-day Adventist Guam Clinic
388 Ypao Rd
Tamuning, GU 96913
ph: 671-648-2525
fax: 671-648-2555

Heather Narcis

From: Roy, Gary <Gary.Roy@GRMC.gu>
Sent: Thursday, March 17, 2016 12:02 PM
To: Heather Narcis
Subject: Todays BOP meeting
Attachments: ROES.docx

Heather,

1. Attached is my statement on Telepharmacy
2. This email is to serve as notification of expansion of GRMC pharmacy hours from 7am-11pm to 24/7 to begin effective when pharmacists are hired and trained
3. I notified the board of a potential diversion of controlled substances, for which a DEA Form 106 was submitted.

Gary Roy R.Ph.
Director of Pharmacy
Guam Regional Medical City
133 Route 3
Dededo GU 96929
Office: (671) 645-5500 ext. 4830

GUAM REGIONAL MEDICAL CITY
Where Patients are Partners

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Guam Regional Medical City &
Cardinal Healthcare
133 Route 3 Dededo, GU 96929
671-969-4830
Gary.Roy@grmc.gu

GUAM REGIONAL MEDICAL CITY

MARCH 17, 2016

Board Members,

I am appearing to make a statement about Telepharmacy on Guam. I represent Cardinal Healthcare and GRMC in supporting the rules of telepharmacy and urge the adoption of said rules. Telepharmacy, of which we would use the Remote Ordered Entry Services (ROES) would benefit the citizens of Guam greatly. I have used ROES for the better part of 10 years in my home state of Maine. I am here to say that ROES made medication management safer, decreased costs, provided timely clinical information, improved patient outcome, improved staff satisfaction, and improved patient & family satisfaction. We were able to show to quantify all these statements through our QI processes. Something we were also able to show is that the ROES pharmacists had less errors than our in house staff, which was unintended. We were able to deduct that this was because of less distractions that the ROES had, as they are solely able to focus on verification and entry of orders from a remote location without distractions. Telepharmacy is everywhere in the United States and continues to grow. It is important for Guam to adopt rules that regulate telepharmacy to allow for institutions, such as GRMC, to utilize these services to make medications management safer. I would urge the Board of Pharmacy to keep moving this along. The Board has been working on this for close to 18 months and hopefully a resolution is in the near future for the people of Guam. I wish to thank the Board for their hard and diligent work in the writing of these rules. If anyone has any questions on telepharmacy, I would be more than glad to answer the questions as someone who looks to use this service now and as someone who has used this service successfully for close to 10 years.

Best regards,

Gary Roy

DIRECTOR OF PHARMACY GRMC

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Cardinal Healthcare
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Best regards,

GF Roy RPh

Gary Roy

DIRECTOR OF PHARMACY GRMC

March 12th (Sat) 0730–~~0830~~ 0900 GMH Boardroom

Karen
Fely
Leonila
Cheryl
Cathy
Tanya
Mildred
Evangeline

- Informed group about March 9th meeting
- Board following due process for applicants (Cardinal & GRMC) for Telepharmacy
- Reminded group that Telepharmacy statute since 1998 but no rules.
- Reviewed proposed Immunizing Pth Law & DPHSS Immun. Program reporting requirement.

March 7, 2016

Dear Cheryl,

I am faxing the following:

Draft rules for telepharmacy (4 pages)
Draft law for Immunizing pharmacist(5 pages)
Draft law for Sterile pharmaceuticals (6 pages)
Draft rules for Good Compounding Practices (3 pages)
Draft Institutional Pharmacy Rules (11 pages)

Please confirm receipt of all pages via cell phone call or text.

Thanks,

Vangie

March 9th

1. Cheryl O. Marimla cheryl.marimla@expressmedpharmacy.com / 632-8100
2. Gary Rey gary.rey@grmc.gu / 969-4830
3. Karen Song karensong67@gmail.com 998-1900
4. PAUL PALMACCIO paul@paylessmarkets.com
5. Marlene O. Borja moborja@teleguam.net
6. Blanche Duenas ba.duenas@gmail.com
7. Dana Oshiro ~~dosh~~ doshiro@hawaii.edu
8. Mildred Gabriel mem@guam.net
9. Albert Gurusamy a.gurusamy@hpguam.com
10. Evangeline Phillips (GBEP)

Stakeholders' Working Session
GMHA ~~Classroom~~ Boardroom
Wednesday, March 9, 2016
0700-0800

Topics

1) Introduction by GBEP Rules Committee Chair
2) Draft rules for Telepharmacy – Q&A
3) Draft law for Immunizing Pharmacists – Q&A
4) Draft law for Sterile Pharmaceuticals – Q&A
5) Draft rules for Good Compounding Practices – Q&A
6) Draft Institutional Pharmacy rules – Q&A
7) Conclusion and schedule for next working session

- Reviewed history of Board statute/Rules & challenges.
- Touched on Telepharm. Rules DRAFT

GUAM BOARD OF EXAMINERS FOR PHARMACY

Department of Public Health & Social Services
Government of Guam
P.O. Box 2816
Agana, Guam 96910

Date: March 2, 2016

To: Cheryl Marimla, RPh
President, Guam Pharmacists Association (GPhA)
cheryl.marimla@expressmedpharmacy.com

From: Lourdes Evangeline Phillips, PharmD, CGP
Chairperson, Rules Committee
Guam Board of Examiners for Pharmacy (GBEP)
lourdes.phillips64@gmail.com

Subject:Participation of GPhA members/stakeholders at rules working session

Dear Ms. Marimla,

The GBEP Rules Committee has been working on revising the Guam Pharmacy Practice Act (10 GCA Chapter 12) and on developing rules for amendment to 25 GAR Chapter 13 for the past 18 months. We have these drafts and would like to now share them with members of the GPhA. This is a prelude to a public hearing, which the GBEP will conduct, in accordance with the Guam Administrative Adjudication Law.

A Public Hearing is scheduled at the HPLO Conference room at 0730 on March 17, 2016 concerning the Draft Telepharmacy Rules (as an amendment to 25 GAR Ch. 13). We are requesting a stakeholders' meeting/working session with the GPhA over the next 2 weeks. We understand that this may be short notice so please schedule two separate dates/times if necessary to reach the membership.

Please share this with your other officers, Board of Directors, and members of GPhA and do not hesitate to contact me should you have any questions or concerns.

Respectfully,

Lourdes Evangeline ("Vangie") Phillips, PharmD

cc: Marlene Carbullido, HPLO Acting Director
Heather Narcis, HPLO Clerk
Robert Weinberg, AAG
Thomas J. Caruso, GBEP Acting Chair
Margaret Greenwood, GBEP Acting Secretary
Angelina Eustaquio, GBEP Member

02-15-17
GB

PCF/AG #: *DPHSS 17-0053* DEADLINE: *02/15/17*

CASE #: *None* CASE NAME: *N/A*

TYPE OF DOCUMENT: *Letter to Thomas Caruso, Guam Board of Examiners for Pharmacy*

FILE: ☐ SUPERIOR COURT ☐ OTHER

☐ DISTRICT COURT

SERVE:

1 *HPLO, DPHSS*
2 ***Nothing Follows***
3
4
5
6
7
8

02-15-17 GBMT

SPECIAL INSTRUCTIONS: *Have each flagged item stamped received.*

☑ RETURN FILE COPY W/ACKNOWLEDGEMENT OF RECEIPT & SCAN ☐ PREPARE DECLARATION OF SERVICE

☐ RETURN FILE TO ATTORNEY

ATTORNEY: *Barrett-Anderson, Elizabeth, Attorney General*

PREPARED: *Blas, Maria, LSI* 1130 e 24 DATE: *2/15/17 10:51 AM*

Letter to GBEP re: Attorney General Approval of Proposed Rules of the GBEP Governing Telepharmacy Practice Across Guam/State Lines

NOTE