

From: Jones, John D [REDACTED]
Sent: Tuesday, June 09, 2009 6:18 PM
To: Gay Dodson
Subject: Potential for Customer Service and Prior Authorization Facility in Texas

Gay,

It was great talking to you. As I explained to Kim Caldwell, Prescription Solutions has established a shared services pharmacy model for its mail service operations and is seeking to understand how the Texas board of pharmacy would view this model if we located an office within the state. The model may be described as such:

- Pharmacists and technicians are located in offices (non-dispensing pharmacies) and/or fulfillment centers (dispensing pharmacies) in several states
- All pharmacists and technicians are licensed in the state where they are located
- Pharmacists-in-charge are licensed in the state of their residence pharmacy as well as in the states that require out-of-state pharmacies to have their pharmacists-in-charge licensed in the state the pharmacy is shipping to
- All locations have pharmacist to technician ratios at 2:1 or less
- The computer system is structured for shared services:
 - The prescription is scanned along with other prescription order documentation allowing a paperless system
 - Electronically received prescriptions (e-scripts) integrate directly into the prescription order generation system
 - Paper prescriptions are entered by technicians into the order generation system by the first available technician without regard to physical location
 - The first available pharmacist checks the technician's work—again the pharmacist could be in another state at a separate location
 - The prescription order once verified by the pharmacist goes to the prescription order fulfillment pharmacy
 - The filled prescription is checked by the pharmacist on site and the prescription is shipped to the patient
 - The computer system tracks each step of the process identifying the pharmacists and technicians involved and provides a record free from repudiation

The main question regards a pharmacy technician working in Texas under the supervision of a Texas licensed pharmacist (under the same roof) where the technician has their work checked by a pharmacist from another state (and licensed in that state) who may or may not be licensed in Texas. The other situation concerns a pharmacist licensed and working in Texas checking the work of a pharmacy technician located in another state working under the direct supervision of a pharmacist in that state.

I hope this helps to clarify the question(s) for your staff and/or the pharmacy board. While we are currently compliant with this business model in the states where we are currently located, we realize that the model is unique and seek to clarify regulatory compliance challenges in states where we are considering locating a business facility.

6/29/2009

Yours,

John

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