



Economic Impact Analysis Virginia Department of Planning and Budget

18 VAC 110-20-10, 20, 421 – Regulations Governing the Practice of Pharmacy Department of Health Professions

January 19, 2000

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 9-6.14:7.1.G of the Administrative Process Act and Executive Order Number 25 (98). Section 9-6.14:7.1.G requires that such economic impact analyses include, but need not be limited to, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. The analysis presented below represents DPB's best estimate of these economic impacts.

Summary of the Proposed Regulation

The Board of Pharmacy proposes to add a provision to the *Regulations Governing the Practice of Pharmacy* that allows for a waiver of the requirement for a final check by the pharmacist if a drug is being dispensed by a robotic pharmacy system. The proposed regulations require approval of such a system by an informal conference committee of the Board based on a quality assurance plan adopted by the pharmacy and an optional inspection of the system.

Estimated Economic Impact

Current regulations require that the pharmacist “*inspect the prescription product to verify its accuracy in all respects, and place his initials on the record of dispensing as a certification of the accuracy of, and the responsibility for, the entire transaction*” (18 VAC 110-20-270 B). The proposed provision would allow a waiver of this requirement for prescriptions dispensed by a robotic pharmacy system. With the use of a robot, the end of the process is checked by a bar code scanner, which, according to the Board of Pharmacy, provides better accuracy than human

checking. The potential for mistakes with a robotic system occurs at stages other than the end. For example, the drugs must be repackaged into bar-coded packages and loaded into the system and each prescription order must be manually entered into the computer operating system.

The Board of Pharmacy proposes to amend the rules to require pharmacist checking at other points in the robotic dispensing process where errors can occur and cause the wrong drug to be dispensed, rather than check each and every prescription at the end of the process. Specifically, the proposed regulation would require that a pharmacist review all data entry of prescription orders into the computer system for accuracy and appropriateness of therapy and also check all repackaged medication prior to loading into the system. In addition, the board has required the submission of a quality assurance plan that will be reviewed by an informal conference committee prior to approval of a waiver. According to the board, the safety of the drug being dispensed by a robotic system may be protected without a final check of each prescription before it leaves the pharmacy. Through the quality assurance plans and other proposed requirements, the accuracy and safety of patient prescriptions remains the responsibility of, and under the control of, the licensed pharmacist.

The cost of obtaining the proposed waiver includes the time spent developing the quality assurance plan and a \$150 application fee. The board may also charge an additional \$150 fee for the inspection of a new or modified robotic system. The benefits of proposed regulation include moving safety measures to areas where they may be more effective and allowing pharmacies to choose the least costly means of providing pharmacy services. By waiving a time-consuming function that may only be performed by a licensed pharmacist, this provision may allow the pharmacist to spend more time on other activities that can enhance patient care quality.

Businesses and Entities Affected

The Board of Pharmacy is aware of four hospital pharmacies that have already purchased robotic pharmacy systems. It is not known how many other pharmacies may purchase robotic systems in the future, but those most likely to do so are pharmacies that handle a high volume of prescriptions, such as large hospitals, medical centers, or long-term care facilities.

Localities Particularly Affected

No localities are particularly affected by the proposed regulation.

Projected Impact on Employment

The proposed regulation may reduce the demand for licensed pharmacists if some pharmacies determine it is more cost-effective to purchase a robotic system than to employ another pharmacist.

Effects on the Use and Value of Private Property

The proposed regulation is not anticipated to have a significant effect on the use and value of private property.