

From: [Funk, Andrew \[IBPE\]](#)
To: [Jorgenson, Debbie \[IBPE\]](#)
Subject: Fwd: TelePharmacy Proposal
Date: Thursday, October 29, 2015 4:44:36 PM

Sent from my iPhone

Begin forwarded message:

From: Roby Miller <robby@telepharm.com>
Date: October 29, 2015 at 4:21:31 PM CDT
To: "Funk, Andrew [IBPE]" <Andrew.Funk@iowa.gov>
Cc: "Witkowski, Terry [IBPE]" <Terry.Witkowski@iowa.gov>
Subject: TelePharmacy Proposal

To Members of the Iowa Board of Pharmacy:

TelePharm apologizes for any miscommunication with the submission of our pilot program proposal. We have been working in good faith for many months with numerous stakeholders to ensure we can craft a proposal that is beneficial to Iowa's pharmacy community and the underserved Iowans who greatly need pharmacy services nearby.

TelePharm and the communities involved do not want a miscommunication between parties to step in the way of what is important here – providing safe, local, and convenient access to a pharmacist's care for Iowa's underserved patients.

At this time we are going to remove our proposal for the November 4th board meeting and regroup with stakeholders. We look forward to working with you all in the near future.

Thank you,
Roby

--

Roby Miller
Chief Executive Officer

[TelePharm](#)
O: [319.535.0571](tel:319.535.0571)
C: [319.458.0169](tel:319.458.0169)



To: Iowa Board of Pharmacy Members
 From: Kate Gainer, Executive Vice President
 Date: October 29, 2015
 Re: Telepharmacy proposal

As healthcare delivery evolves to provide patients access to high quality and cost effective care, innovative approaches to care delivery are an essential piece of the evolution. The Iowa Pharmacy Association (IPA) is focused on maximizing patient access to pharmacist-delivered services to ensure safe and appropriate use of medication. In today's healthcare system, pharmacists are increasingly recognized as a provider on the patient's healthcare team, working in collaboration with physicians, other providers and patients.

To address the topic of telepharmacy, IPA policy as adopted by the House of Delegates in 2007 and 1999 is as follows:

| | | |
|-------|-----------------------------|---|
| 07-U2 | TELEPHARMACY | IPA recognizes telepharmacy as the provision of pharmaceutical care to patients at a distance via telecommunications and information technologies, and supports pharmacists as the sole provider of telepharmacy services as a method to expand access and enhance the pharmacist-patient relationship. |
| 99-U1 | TELEPHARMACY AND TELEHEALTH | <p>IPA acknowledges telepharmacy as a component of telehealth and supports the pharmacist as the only appropriate provider of these services for which compensation should be provided.</p> <p>IPA supports appropriate regulatory oversight of telepharmacy by the Iowa Board of Pharmacy Examiners which maintains guidelines protecting the public health and patient confidentiality.</p> <p>IPA supports delivery and documentation of telepharmacy services by pharmacists at the same standard of practice as would be expected if the services were provided in a person to person setting.</p> <p>IPA shall participate in ongoing development of telehealth infrastructure including, but not limited to regulations, standards development, security guidelines, information systems, and compensation.</p> <p>IPA recognizes that while information technology can and should be employed to enhance pharmaceutical care, pharmacists should not forego their professional judgment in determining the optimal communication methods for specific patient situations.</p> |

Advancing patient health through communication, education and innovation.

8515 Douglas Ave., Suite 16 • Des Moines, IA 50322 • 515.270.0713 • Fax: 515.270.2979
 Website: www.iarx.org • E-mail: IPA@iarx.org



In addition, IPA adds the following recommendations as it relates to telepharmacy:

- To reconvene the joint IPA/Board of Pharmacy Telepharmacy Task Force before the end of the year or in early 2016 to deliberate details that would be considered for rulemaking (pursuant to passing legislation introduced in 2015)
- To provide unbiased education on the topics of telehealth and telepharmacy to Board of Pharmacy members at an upcoming BOP meeting, in advance of receiving and deciding on future proposals for telepharmacy sites in Iowa
- To seek and receive input from healthcare stakeholders throughout the upcoming year including (but not limited to) pharmacists interested in telepharmacy; physicians, dentists, nurse practitioners and other local providers in healthcare settings and communities interested telepharmacy; other state boards of pharmacy, NABP, and other Iowa healthcare provider regulatory boards.

As it relates to the proposal included in the Board of Pharmacy background material for the November meeting, IPA had not approved the proposal before it was submitted. Following a presentation made by TelePharm to the IPA Board of Trustees in November 2014, IPA has maintained ongoing discussions with TelePharm to discuss opportunities for collaboration. IPA has an interest in working with Iowa pharmacies interested in telepharmacy models, as well as companies that provide the technological capabilities to provide input and direction on behalf of the pharmacy profession. Following a meeting in October which included IPA, the University of Iowa College of Pharmacy and TelePharm to discuss telepharmacy research, a draft proposal was developed that combined a research study with pilot site approval. While this draft proposal was circulated and initial feedback was provided, a finalized draft was never received or approved prior to being submitted to the BOP.

At this time, IPA is interested in the research aspect of telepharmacy to gain an understanding of unknown, yet speculated, impacts and outcomes related to telepharmacy practice on patient care. While the research aims have not been clearly defined, examples of what a study could assess include (but are not limited to) level of pharmacist care provided; types of pharmacist services provided; community and healthcare provider satisfaction; patient adherence and satisfaction. IPA has had preliminary conversations to address potential grant funding to help support such a study in the state of Iowa.

Patient-centric, high-quality and cost-effective healthcare delivery is a complex puzzle with many pieces. It often takes more than one try to place a puzzle piece in the perfect fit. IPA believes telepharmacy is a piece of the puzzle, but the surrounding pieces have not been completely defined to create the perfect fit. Stakeholder engagement, task force recommendations, pilot site data, experience from other telehealth practices, education and research are all elements that will help bring clarity to how telepharmacy best fits into the evolving healthcare delivery model in the state of Iowa. IPA is interested and willing to partner with stakeholders, including the Board of Pharmacy, to work on each of these efforts.

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Proposed Telepharmacy Pilot Project

Submitted to the Iowa Board of Pharmacy October 29, 2015

BACKGROUND

In Iowa, almost half the population — 1.4 million people — live in a rural area. In the past 2 years, 71 pharmacies have closed in the state, most of which served rural areas. These closings have left approximately 300,000 Iowans without convenient access to a pharmacy. Access to a pharmacist has been shown to be highly effective in improving outcomes.¹ Residents in these rural areas, typically elderly, have to travel long distances to pick up their prescription medications and see their pharmacist. They already face a number of challenges related to healthcare services close to home, including weather, geography, and social barriers. Patients see their pharmacist more often than any other healthcare professional², so making them more readily available should be a top priority.

SOLUTION FOR COMMUNITIES

Telepharmacy is the only affordable option for these communities to get access to local pharmacy services. North Dakota State University ran a successful study of telepharmacy from 2002-2008 with 57 remote pharmacy sites across the state; they found less than 1 percent error rate, less than half of the national average.³

“This innovative program has shown that quality, affordable pharmacy services can be provided in remote rural areas without compromising safety and while still adhering to all regulatory requirements.” - North Dakota Experience Report

WAIVER REQUEST

We are requesting individual consideration (site-by-site) of an 18-month waiver for each of the proposed locations. A telepharmacy petition as well as a waiver request have been completed for each site, and all of them have been included together in this packet for your convenience.

In order to implement this pilot project, it is requested that the Iowa Board of Pharmacy waive the AMDS requirements as well as references to automated pharmacy systems per the Iowa Administrative Code Rule 657 Chapter 9, and allow a Certified Pharmacy Technician (CPhT) to perform these tasks.

In addition, for three sites we are requesting waivers for rule 657—9.5(2)c *Need for remote dispensing site*. By waiving rule 657—9.5(2)c, the Board of Pharmacy would allow a telepharmacy to be located within 15 miles of another pharmacy. This waiver will allow these communities under this radius restriction local access to a pharmacy.

¹ [Improving Patient and Health System Outcomes through Advanced Pharmacy Practice](#); A Report to the U.S. Surgeon General 2011. Rev: 5/2011, 8/2011, 12/2011. US Public Health Service.

² George E. MacKinnon III, PhD, RPh, FASHP. [Recognizing pharmacists as healthcare providers—a solution for the Patient Protection and Affordable Care Act roll-out](#). August 13, 2013.

³ [The North Dakota Experience: Achieving High-Performance Health Care Through Rural Innovation and Cooperation](#); Douglas McCarthy, Rachel Nuzum, Stephanie Mika, Jennifer Wrenn, and Mary Wakefield, May 2008.

LOCATION OVERVIEW

Each of the 6 proposed locations will be implemented according to a proven template for telepharmacy operations that has been used in the current telepharmacy locations, specifically the Zearing and State Center locations. The pharmacist will be on site for face-to-face interactions with patients at least one day per month.

- Winfield
- Bancroft
- Sioux Rapids
- Wayland
- Lake Park
- Nora Springs

Details on each of these locations can be found in the attached telepharmacy petitions and waiver request forms. These attachments include details on expected prescription volume, data reporting to the Board, technology which will be used, policies and procedures, and safety protocols.

MANAGING PHARMACY

Managing pharmacy operations will be centralized for consistency in the operations. The presence of a pharmacist on site will be scaled up as necessary, relative to volume and clinical services provided. Pharmacist will be on site at least once monthly for site inspection and administration of clinical services. Medication Therapy Management (Adherence, Therapy, CMR, etc) will be performed on an ongoing basis by remote pharmacists.

NuCara Health Solutions

1150 5th Street Suite 150

Coralville, IA 52241

License #: 1543

- 3 full-time pharmacists on staff

CERTIFIED PHARMACY TECHNICIANS

All pharmacy technicians working at the telepharmacy sites will be required to obtain and maintain current Certified Pharmacy Technician (CPhT) status through the Pharmacy Technician Certification Board (PTCB). Technicians will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules. They will also be required to have the following:

- Minimum of two years experience working in an Iowa pharmacy
- Training in a telepharmacy setting before beginning at the remote pharmacy site
- Must adhere to all other rules and regulations set forth by the Iowa Board of Pharmacy

ATTACHMENTS

- Telepharmacy petition
- Waiver request form
- Community support letters

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on Board's agenda is three weeks prior to Board meeting.

Case No. or State ID No.

Rec'd:

(FOR PHARMACY BOARD USE ONLY)

IOWA BOARD OF PHARMACY
Petition for Waiver Variance
(check the appropriate box)

PLEASE PRINT OR TYPE ALL INFORMATION IN INK

A waiver excuses the petitioner from the requirements of a rule in its entirety or from a part of a rule; a variance does not. Instead, a variance is a modification to the requirements of a rule or a part of a rule. Example: A rule requires the fencing of certain property and further requires that the fence be at least 6 feet in height. A waiver of that rule would excuse the petitioner from the requirement for fencing the property. A variance would require the property be fenced but would allow the petitioner to maintain the current fencing configuration of 5 feet in height (perhaps the fence was constructed prior to the height requirement). When replacement of the current fence becomes necessary as a consequence of normal wear and tear, the variance would terminate and the petitioner would be required to comply with the 6-foot height requirement.

Note: Statutory requirements that have been repeated in administrative rules are not subject to consideration for a waiver or variance.

Is this petition an initial request or is it a request for renewal? Initial Request Request for Renewal
If a request for renewal, explain below why the renewal is necessary.

Petitioner Information (include licensee/registrant name and name of contact person, i.e. pharmacist in charge)

Name: TelePharm / Adam Chesler Phone No.: 319-535-0571
a.k.a. Winfield Pharmacy (include area code)
Address: 105 Iowa Ave Ste #231

City: Iowa City State: IA Zip Code: 52240

Petition Information

1. Chapter Number and Title.

Chapter 9, AUTOMATED MEDICATION DISTRIBUTION SYSTEMS AND TELEPHARMACY SERVICES
2. Rule Number(s) and Title(s).

9.3 (2) *Telepharmacy.*
3. Describe in your own words the essence of each Rule Number(s) and Title(s) that pertains to this petition.

9.11 (2) By waiving rule 657—9.11(2), the Board of Pharmacy would allow a Certified Pharmacy Technician to perform these tasks in place of an AMDS. An independent telepharmacy platform will be used to manage and oversee all telepharmacy operations.
4. Describe the specific nature and scope of your petition. In your description, include the anticipated time period (beginning and ending) for which the petition would apply. A waiver or variance may not be requested or granted on a permanent basis; the petition must identify an end date.

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on
Board's agenda is three weeks prior to Board meeting.

A new pharmacy will be opened with the community to give residents local access to a pharmacist. Please see the attached document with additional information as described in the "Telepharmacy Petition Requirements 5-2014" document.

5. Describe the relevant facts and reasons that, in your opinion, justify and provide "clear and convincing evidence" as to why this petition merits consideration for waiver or variance. In your description, explain why the rule(s) poses an undue hardship. If there is a public health, safety and welfare issue associated with this rule(s), or if this rule(s) addresses security or confidentiality issues, also explain how equal protection will be maintained if this petition were granted.

Telepharmacies in the state have operated safely and successfully since 2012. As the population in these small, rural areas is aging, the residents can benefit from having more direct access to pharmacy services, pharmacist oversight of OTC medication, and direct access to a pharmacist in the community. This is a critical service for the future of rural communities throughout the state.

6. Does anyone else (inside or outside state government) possess knowledge relevant to this petition?

Yes No Do not know

If yes, list their names, addresses and phone numbers below.

Chris Finnell, Mayor of Winfield, IA - (319) 931-0998
Ryan Kennenberg, Resident of Winfield, IA - (319) 931-0998

7. Would anyone (inside or outside state government) be adversely affected if this petition were granted?

Yes No Do not know

If yes, list their names, addresses and phone numbers below.

8. Do you know how the Board of Pharmacy has treated similar situations?

Yes No

If yes, describe below how similar situations were handled.

Waivers have been granted to the five (5) locations in the state. These locations have been operating safely and effectively for the past three years. This site will conform to the same operating policies and procedures and use the same technology and safety protocols as the existing telepharmacy locations.

9. Have you had any past interaction with the Board of Pharmacy that might impact or relate to this petition?

Yes No

If yes, describe below the issue involved and the outcome.

A request was submitted for consideration at the Board meeting on August 31, 2015 and discussion was tabled until the November meeting.

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on
Board's agenda is three weeks prior to Board meeting.

I authorize any person with knowledge of the relevant or important facts relating to this petition to release any pertinent information to the Iowa Board of Pharmacy. I hereby attest to the accuracy and truthfulness of the information contained herein.



Petitioner's Signature

10/29/2015

Date

Winfield Telepharmacy Petition

October 29, 2015

Submitted by:

Adam Chelser, PharmD
Vice President of Operations
TelePharm
105 Iowa Ave Ste #231
Iowa City, IA 52240
(319) 535-0571
adam.chesler@telepharm.com

A. Establish the need for remote pharmacy site (telepharmacy practice)

- 1. Identify all pharmacies within a 25-mile radius of the proposed remote pharmacy site and distance of each pharmacy from the proposed remote pharmacy site**

All pharmacies within a 25-mile radius of the proposed remote pharmacy site:

Walmart Pharmacy
1045 N Grand Ave
Mt Pleasant, IA 52641
15.6 miles

Hy-Vee Clinic Pharmacy
312 North 2nd Street
Wapello, IA 52653
16.7 miles

Hy-Vee Drugstore
129 S Jefferson St
Mt Pleasant, IA 52641
16.7 miles

Hy-Vee Clinic Pharmacy
501 S White Suite #3
Mt Pleasant, IA 52641
17.1 miles

Medicap Pharmacy
300 W Washington St
Mt Pleasant, IA 52641

16.8 miles

Capstone Pharmacy
210 N Jefferson St
Mt Pleasant, IA 52641
16.6 miles

Hy-Vee Pharmacy
1700 E Washington St
Mt Pleasant, IA 52641
18.8 miles

Walmart Pharmacy
2485 IA-92
Washington, IA 52353
23.4 miles

Hy-Vee Pharmacy
528 IA-1
Washington, IA 52353
25.6 miles

Beans Pharmacy
222 S Iowa Ave.
Washington, IA 52353
24.6 miles

Carruthers Pharmacy
526 Main St
Mediapolis, IA 52637
22 miles

Reliant Long Term Care Pharmacy
1010 W Madison St Ste B
Washington, IA 52353
25.3 miles

2. Distance to the pharmacy nearest to the proposed remote pharmacy site

15.6 miles

3. Distance between the managing pharmacy and the proposed remote pharmacy site

46.4 miles

4. Population of the community

1,139

5. Is the community in a critical access area

No

6. Identify prescribing practitioners currently practicing in the community, if any

Henry County Health Center

Tess Judge-Ellis, DNP, ARNP

7. Average number of prescriptions per day anticipated

20-40 prescriptions

8. If there was a pharmacy formerly located in the community, when did the pharmacy close and how long had the pharmacy been located in the community? Is there currently a pharmacy in the community with plans to close? If so, when is the anticipated closing?

The previous pharmacy closed more than 30 years ago

9. How and from where do residents of the community currently obtain their prescription medications?

Most residents travel to Mt Pleasant and get their prescriptions filled at Hy-Vee or Walmart

10. Will the remote pharmacy site be located in a medically underserved area (per federal definition)?

No

11. Will the remote pharmacy site be located near a rural health clinic (per 42 USC § 1395)?

No

12. Will the remote pharmacy site be located near a federally qualified health center?

No, 10.1 miles away

13. Will the remote pharmacy site be located near a health care facility?

Yes, Henry County Health Center

14. Will the remote pharmacy site provide unique services that are not available from other area pharmacies?

No

B. Remote pharmacy site operational plan (submitted with initial license application)

1. Name and address of managing pharmacy and remote pharmacy site

Managing pharmacy

NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

Remote pharmacy site

Winfield Pharmacy
102 North Locust St
Winfield, IA 52659

2. Will automated dispensing equipment be used to dispense prescription drugs from the remote pharmacy site? If so, what type of automated system will be used and to what extent will dispensing be automated?

No automated dispensing equipment will be used to dispense prescription drugs from this remote pharmacy site.

3. Name and address of owner(s) of managing pharmacy and remote pharmacy site

Managing pharmacy

NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

Remote pharmacy site

TelePharm
105 Iowa Ave, Ste 231
Iowa City, Iowa, 52240

4. Name and address of pharmacist in charge of managing pharmacy and remote pharmacy site

Pamela Wong Wiltfang
NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

5. Name and address of certified pharmacy technician who will be the technician in charge of the remote pharmacy site

This will be determined after approval of this site, and will be submitted with the initial license application.

6. Identification of all remote pharmacy sites managed by the managing pharmacy

NuCara Pharmacy State Center, IA
NuCara Pharmacy Zearing, IA

- 7. Scale drawing of the remote pharmacy site that illustrates the following:**
- a. Layout and location of all systems and system components**
 - b. Location of patient counseling area**
 - c. All access points to the electronic record-keeping system and drug inventory**

The location will be constructed using a standard pharmacy layout including a full community pharmacy prescription department, an OTC department for basic medical supplies, and a private clinical consultation room to be used for patient counseling and other private activities. It will also be handicapped accessible and secured with 24/7 motion and alarm systems. The details of this location will be determined after approval of this site, and will be submitted with the initial license application.



- 8. Description of the proposed telepharmacy practice including days and hours of operation and the remote pharmacy site's anticipated opening date**

Please see Appendix A for the description of the telepharmacy practice. The anticipated opening date will be May, 2016.

- 9. Policies & Procedures for the telepharmacy service**

Please see Appendix B for the Telepharmacy Policies & Procedures

10. Proposed staffing, identifying all individuals/positions involved with the telepharmacy service from the managing pharmacy and the remote pharmacy site, and including the responsibilities of each staff member

- a. All technicians practicing at the remote pharmacy site must be nationally certified and registered with the Board**
- b. All technicians practicing at the remote pharmacy site must have a minimum one year of Iowa pharmacy practice as a pharmacy technician**

The proposed staffing will be determined after approval of this site, and will be submitted with the initial license application. Our target technician will have 5+ years of experience. Prior to opening the technician will work in an established telepharmacy for training.

11. Plan for training personnel practicing at managing pharmacy and remote pharmacy site

The personnel which will oversee the remote pharmacy site from the managing pharmacy all have experience working with the remote pharmacy sites currently operating in Iowa.

The technicians hired to work at the remote pharmacy site will train in an operating telepharmacy during the month prior to starting at the remote pharmacy site. They will be trained according to best practices and standard operating procedures developed at these locations.

12. Identification and description of technology and communication systems to be used between the managing pharmacy and the remote pharmacy site

EnterpriseRx dispensing and Point-Of-Sale system will be used for general operations. The telepharmacy software for remote verification and patient counseling will be provided by TelePharm. EnterpriseRx has been chosen because of the 2-way interface between TelePharm and EnterpriseRx. The data between both systems will have an identical patient database that can be accessed in both sites in real-time. Technicians and Pharmacists both have unique username and passwords with specific roles. For example a pharmacist will have every patient's full profile readily available from any remote dispensing site which they are assigned to oversee.

- a. Type of audio-visual link and communication will be utilized between the managing pharmacy and the remote pharmacy site**

The audio-visual link that will be utilized is a HIPAA-compliant peer-to-peer secure HD video conferencing protocol utilized in TelePharm's technology platform. This technology is in over 100 pharmacies in 8 different states with 100% success rate of pharmacies operating.

- b. Will the link between the managing pharmacy and the remote pharmacy site be a constant, live, or real-time connection; if not, how and when will the link be activated; will the pharmacist be able to open a visual or audio link from the managing pharmacy without the assistance or interaction of the remote pharmacy site personnel**

There will be a live camera feed showing an overview of the pharmacy and the operations which will be readily available by the pharmacist at all times. They will be able to open this link from the managing pharmacy without the assistance or interaction of staff at the remote pharmacy site. In addition, a real-time connection will be made on demand between the pharmacist and patients, as well as technicians. This link can be initiated by pharmacists, technicians, or patients.

c. Will multiple camera views be available from the remote pharmacy site; who controls the camera views

Yes, multiple camera views will be available. The pharmacist at the managing pharmacy can control these camera views. Every part inside the pharmacy will be viewable from the cameras.

d. Will bar-code technology be utilized; if so, how and by whom

Yes, there will be two different bar-code technologies utilized at the telepharmacy:

1. Each prescription has a bar-code which needs to be scanned to open the prescription and begin the filling process
2. The NDC on the stock bottle will need to be scanned prior to filling the prescription
3. Each person who accesses TelePharm's system will have a unique user-id and password. Every action within the TelePharm system is tracked from opening a prescription record, capturing images and initiating counsel sessions.

13. Drug and record security and confidentiality at the remote pharmacy site

All employees will receive additional training pertaining to drug and record security and confidentiality. Additional areas of focus will include patient privacy, FWA, and cultural competency. Data will be transmitted through a HIPAA-compliant secure HTTPS connection to our data servers and stored using 256-bit AES encryption. Standard operating procedures will also be implemented to ensure drug and record security and confidentiality.

14. Record-keeping systems and location

a. Type of electronic/digital record-keeping system with the remote pharmacy site utilize for tracking and recording of dispensing activities and telepharmacy communications

b. Length of time that recorded data will be retained

Enterprise RX software will be utilized for record-keeping to track and record dispensing activities. The Enterprise RX system has a two-way integration into the telepharmacy system provided by TelePharm. Telepharmacy communications will be tracked and recorded through TelePharm software. Recorded data will be retained for a minimum of 10 years. All data and audit logs are readily available and our mirrored databases within both systems to the managing pharmacy.

15. Drug inventory and control

a. Will the remote pharmacy site maintain a stock supply of prescription drugs

Yes, the remote pharmacy site will maintain a limited stock supply of prescription drugs. The specific formulary for this location will be determined based on the need of the patients in the community.

b. Will the remote pharmacy site stock and dispense controlled substances; if so, where and how will controlled substance stock be maintained

Yes, the remote pharmacy site will maintain a limited supply of controlled substances. The specific formulary for this location will be determined based on the needs of the patients in the community. Controlled substance stock class 3-5 will be dispersed throughout the regular inventory, and will be checked bi-annually through inventory. Ordering trends will be monitored from the corporate office. CII drugs will only be ordered and stored on a requested basis by the local clinics/physician. CII drugs will be kept in a locked, secure location and a perpetual inventory will be kept and inspected on at least a monthly basis.

c. How will drugs be packaged for dispensing to the patient and who will package and label the patient's prescription

All prescriptions will be packaged and labeled by the certified pharmacy technicians working on-site at the remote pharmacy site. They will only be dispensed to the patient after they are verified by the pharmacist.

d. How often will noncontrolled prescription drugs be inventoried and by whom

The pharmacist will inventory the noncontrolled prescription drugs perpetually with software, and will conduct a manual inventory bi-annually.

e. How often will controlled substances be inventoried and by whom (suggest pharmacist in charge or pharmacist designated by pharmacist in charge)

The Pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge will ensure controlled substance inventory counts are recorded. Class 3-5 controlled substances will be monitored perpetually in the software, and reconciled bi-annually. CII inventory will be monitored perpetually in the software and will be reconciled at least once monthly.

f. If a perpetual inventory for controlled substances is utilized, who will reconcile the perpetual inventory to the physical inventory and how frequently (suggests monthly reconciliation by pharmacist in charge or pharmacist designated by pharmacist in charge)

Perpetual inventory will be utilized for controlled substances located at the remote site. Class 3-5 controlled substances will be reconciled biannually by the pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge. For Class 2 controlled substances, the pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge will reconcile the CII inventory at least monthly.

16. Scope of clinical pharmacy services to be provided at remote pharmacy site and who will provide those services

A comprehensive guide of services will be provided on-site, and tailored to the community's needs based on dialogue and relationships with the local prescribers and other healthcare providers. These services may include but are not limited to:

1. Medication Therapy Management
2. Comprehensive Medication review
3. Immunizations
4. Drug/Disease state education
5. Respiratory therapy
6. Durable medical equipment
7. Direct video link into clinic for clinical pharmacy services
8. Point-of-care testing with pharmacist on-site
9. Medication Synchronization

17. Continuous quality improvement plan and how it will be implemented and utilized

The pharmacists on duty for telepharmacy and the technician at the telepharmacy will be responsible for recording Continuous Quality Improvement (CQI) data to include metrics such as consultation and error rates. The staff will also utilize third party reporting for quality events. CQI events will be monitored from the corporate level to determine adjustments to best practices in order to prevent further occurrences.

18. System downtime plan and procedures

The telepharmacy cannot operate if the audio / visual link cannot be established and no prescriptions may be filled or dispensed. All dispensing activities will halt until the audio / visual link can be re-established. A cellular backup connection will be evaluated depending on the speed and reliability.

19. Processes for ensuring safety and security of patients and staff

Disaster preparedness plans will be included in the training for pharmacy staff. These plans include processes to ensure the safety and security of patients and staff. Additionally, cameras will be placed throughout the store.

20. Patient counseling process including plans to ensure security of patient information and privacy for discussions with patients

Managing Pharmacy will install telepharmacy audio / visual equipment from TelePharm. This equipment will provide an audio / visual link between the managing and remote location and also allow for HIPAA compliant counseling of patients. Patient counseling will be required and enforced with Telepharm software, compliant with Iowa consultation laws.

21. How toll-free telephone service will be provided and available to patients for direct contact with the managing pharmacy

Signs will be placed throughout the store alerting customers how to contact the managing pharmacy. Additionally, a pharmacist will always be available at the managing pharmacy through the TelePharm software to communicate with patients. Any calls coming into the remote pharmacy can easily be transferred directly to the pharmacist.

22. Schedule and process for periodic inspection of remote pharmacy site

a. How often will a pharmacist from the managing pharmacy inspect the remote pharmacy site

A pharmacist from the managing pharmacy will inspect the remote pharmacy site at least once per month.

b. What will be included in periodic inspection at the remote pharmacy site and who will conduct the inspection

Please see Appendix C for the monthly inspection checklist which will be conducted by a pharmacist from the managing pharmacy.

c. What will be the process to address discrepancies

Discrepancies will be followed with an immediate action plan to resolve and prevent further discrepancies. All reporting from each inspection will be reported to the corporate office for further evaluation.

23. Identification of information and data that will be provided in periodic reports to the Board

The telepharmacy site will provide the Board with periodic reports including, but not limited to, the following information:

- Documented information regarding specific pharmaceutical services provided to patients at the remote pharmacy site
- Number of prescriptions dispensed from the remote pharmacy site
- Number of prescriptions which came directly from the local clinic
- Identification of errors in dispensing from the remote pharmacy site by type of error and actions taken to resolve and prevent future errors by type
- Information regarding interactions with prescribers and community outreach efforts to patients and prescribers
- Successful counseling rate at the remote pharmacy site including comparison with counseling rate at the managing pharmacy
- Number of hours a pharmacist was physically present at the remote pharmacy site
- Number of hours the remote pharmacy site was open for business
- Plans for future onsite pharmacist staffing and criteria used to determine the need for onsite pharmacist staffing
- Patient surveys on satisfaction and care received

24. Specific identification of “technician in charge” – include qualifications

The “technician in charge” at the telepharmacy will be determined after approval of this site, and will be submitted with the initial license application.

25. Prohibit the OTC sale of controlled substances from remote pharmacy site when the pharmacist is not physically on-site

No OTC controlled substances will be sold from the remote pharmacy site when the pharmacist is not physically on-site.

26. Prohibit a pharmacist intern from practicing at the remote pharmacy site unless a qualified pharmacist is physically present at the remote site to supervise the pharmacist intern

Pharmacist interns will not be allowed to practice at the remote pharmacy site unless a qualified pharmacist is physically present at the remote site.

Appendix A: Description of the Telepharmacy Practice

This location will be implemented according to a proven template for telepharmacy operations that has been used in the current telepharmacy sites, specifically the Zearing and State Center locations. The pharmacist will be on site for face-to-face interactions with patients at least one day per month.

- The pharmacist will be physically located at the Managing Pharmacy and will be readily available to the technicians and patients at the Telepharmacy Site at all times. The pharmacist will continue to have ultimate authority over the dispensing process.
- The prescription department will be staffed by certified pharmacy technicians. The pharmacist-technician relationship will remain important as the pharmacist will utilize new technologies and the leadership of head technicians to maintain safety protocols for patients.
- All pharmacy technicians working at the telepharmacy site will be required to obtain and maintain current Certified Pharmacy Technician (CPhT) status through the Pharmacy Technician Certification Board (PTCB). They will also be required to have the following:
 - Minimum of two years experience working in an Iowa pharmacy
 - Must adhere to all other rules and regulations set forth by the Iowa Board of Pharmacy
- Technicians will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules
- Prescriptions will be filled according to all the standard operating procedures of a pharmacy. As the technician is filling the prescription, they will capture images of all steps which require pharmacist verification to provide to the verifying pharmacist. These images, along with any other documentation, will be sent to the pharmacist to verify the dispensing and clinical accuracy of the prescription. The prescription must be verified by the pharmacist before it is able to be dispensed to the patient.
- All of the information about the prescriptions filled at the Telepharmacy will be recorded and maintained in secure records with redundant backups for 10 years. This audit trail is readily available for any prescription processed at the Telepharmacy.
- A supervisor will travel to the Telepharmacy site once per week for the first month of operation to ensure policies and procedures are being followed.
- A pharmacist will travel to the Telepharmacy at least one time per month to perform a detailed inspection at the site and have face-to-face time with patients. While the pharmacist is on site, (s)he will verify all policies and procedures are being properly followed. When a pharmacist is not available on site, all verification and counseling will be provided by an Iowa licensed pharmacist.

- Medication counseling and responding to patient questions will be completed through a secure video connection in a private area when the medications are dispensed to the patient. Pharmacists will be readily available for consultation with patients, prescribers, and other care providers through a secure video connection. All patients will be required to review prescription information that includes side effects and warnings prior to the counseling session. All new prescriptions will require pharmacist counseling.

An Iowa licensed pharmacist at the managing pharmacy will remotely verify prescriptions and counsel patients. The pharmacist will be on site to visit each telepharmacy at least monthly, and pharmacist presence will increase as patient growth allows in order to maximize the in-person pharmacist-patient relationship.

Experienced Certified Pharmacy Technicians (CPhT) will be hired to work at the telepharmacy. There will be at least 1 technician staffing the location daily, with an additional technician on call as needed. Every effort will be made to hire technicians who reside in or around the community for ease of commute and connection to the community.

The telepharmacy will initially have approximate hours from 9:00am - 5:00pm Monday through Friday with variations depending on specific community need. Evening hours as well as Saturday hours will be considered.

Appendix B: Telepharmacy Policies & Procedures

POLICIES

1. Managing Pharmacy will operate and maintain a local telepharmacy that will provide access to critical pharmacy services to the community.
2. Managing Pharmacy will ensure that all Iowa Board of Pharmacy telepharmacy rules (Chapter 9) are followed while operating as a telepharmacy, with the exception of the waiver of the AMDS requirement
3. Managing Pharmacy will ensure that available technology is utilized in the operation of the telepharmacy location to protect the health and safety of all patients.
4. All Managing Pharmacy Operational Policies and Procedures will apply to the telepharmacy unless contradicted by the specific telepharmacy procedures as described in this section.
5. All pharmacy technicians working at the telepharmacy sites will be required to obtain and maintain current Certified Pharmacy Technician (CPhT) status through the Pharmacy Technician Certification Board (PTCB). They will also be required to have the following:
 - a. Minimum of one year experience working in an Iowa pharmacy
 - b. Training in a telepharmacy setting before beginning at the remote pharmacy site
 - c. Must adhere to all other rules and regulations set forth by the Iowa Board of Pharmacy
6. Technicians will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules
7. Technicians will be responsible for recording Continuous Quality Improvement data to include metrics such as consultation and error rates.

PROCEDURES

1. Pharmacy Overview
 - a. Managing Pharmacy will maintain a licensed community pharmacy.
 - b. The Pharmacist in Charge (PIC) in the community will be responsible for the oversight and operation of the telepharmacy. The PIC will be a pharmacist from the Managing Pharmacy location that has been previously trained on telepharmacy policies and procedures.
2. Personnel Responsibilities
 - a. The PIC will be responsible for the oversight of the telepharmacy operation. The PIC will develop and maintain the Operational Policies and Procedures of the telepharmacy and is responsible for training the staff of the telepharmacy and the managing pharmacists in the legal and safe operation of the telepharmacy.

- b. While operating as a telepharmacy, the pharmacy will be staffed with a Certified Pharmacy Technician at all times. The CPhT will be responsible for all technical functions performed at the telepharmacy. The technician will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules.
 - c. The current pharmacist on duty for telepharmacy will be responsible for ensuring the accuracy and validity of all prescriptions dispensed by the telepharmacy. The pharmacist will also be responsible for providing counseling to all patients at the telepharmacy for new prescriptions and as requested for refill prescriptions, OTC medications, or other health information questions.
 - d. The pharmacists on duty for telepharmacy and the technician at the telepharmacy will be responsible for recording Continuous Quality Improvement data to include metrics such as consultation and error rates.
 - e. The PIC of the telepharmacy will ensure monthly controlled substance inventory counts are recorded.
3. Technology Safeguards
- a. Managing Pharmacy will install telepharmacy audio / visual equipment from TelePharm. This equipment will provide an audio / visual link between the managing and remote location and also allow for HIPAA compliant counseling of patients. The telepharmacy cannot operate as a telepharmacy if the audio / visual link cannot be established and no prescriptions may be filled or dispensed.
 - b. The technician at the telepharmacy site will utilize barcode technology and the Tech Check module in the dispensing software to verify the products of all prescriptions filled.
 - c. The telepharmacist on duty at will use the audio / visual link to check the hard copy of new prescriptions, the prescription label, and the contents of the package. The pharmacist will be responsible for the accuracy and validity of the finished prescription product and marking it as complete in the TelePharm software.

Appendix C: Pharmacist Monthly Inspection Checklist

Telepharmacy Site _____ DayTime of Visit _____

Inspected By _____

| | Checklist Item | Y/N | Comments |
|----|---|-----|----------|
| 1 | Is a notice conspicuously displayed on the registered pharmacy premises detailing the name and registration number of the responsible pharmacist and the fact that a pharmacist is accessible for consultation at any time? | | |
| 2 | Are pharmacy technicians following proper Consultation procedure? | | |
| 3 | Audit 20 filled prescriptions, are they accurate? | | |
| 4 | Audit 10 hard copies, is proper documentation being observed | | |
| 5 | Observe technicians filling a prescription, are proper SOP being followed? | | |
| 6 | Are customers greeted immediately upon entry? | | |
| 7 | Are proper inventory control SOP being followed? | | |
| 8 | Check 10 shelf bottles on shelf, are any of them expired? | | |
| 9 | Are all staff in clean and proper uniforms and nametags are prominently visible? | | |
| 10 | Is the CII cabinet locked and the key stored appropriately? | | |
| 11 | Are patient required references in clear view? | | |
| 12 | Is the filling area clear and uncluttered? | | |
| 13 | Is the store area clear and uncluttered? | | |
| 14 | Walk the perimeter, are there any concerns? | | |
| 15 | Are the bathrooms clean and tended to? | | |

MAYOR:
Chris Finnell
CITY CLERK:
Angie Oepping

CITY OF WINFIELD



COUNCIL MEMBERS:
Ryan Kinneberg
Ryan Rees
Roger Sharp
Jan Walter
Kathy Nelson

Hello

My name is Chris Finnell. I am the Mayor of Winfield, Iowa. I have been Mayor for the last 4 years and will be running for my second term this November. My family and I have lived in Winfield for nearly 20 years. We moved here from Illinois with the idea of living in a smaller community close to family. Winfield has many positive attributes and the community is working hard to stay viable.

Winfield currently has a health clinic that is open 3 days a week. They are very close to justifying staying open full time. When the citizens of Winfield and surrounding area visit the clinic and are given a prescription they are required to travel to Mt Pleasant or other neighboring towns. Many of our citizens are senior and do not always have the means to travel. This means that they are now burdened with organizing transportation to Mt Pleasant via the SEBUS, family member, or a friend. Most times they will need to wait until the next day to receive their medicine.

Having a pharmacy in Winfield will help our citizens by providing an additional store on our main street, providing medications daily with no travel, promoting additional patients at the clinic so that our citizens can now access health care as needed.

When Tele Pharm first came to me with their business plan and proposal for a pharmacy in Winfield, my first reaction was yea right. I was concerned that this was a scam and we would lose our money. I was ready to discount the idea. I then started thinking that if this was the real deal this proposal would be great for Winfield. I decided that I owed it to the community to do the research and due diligence to determine if this was a legitimate proposal or not. I made a lot of phone calls, visited the town of Victor to look at their pharmacy and spent several hours trying to shot holes in the endeavor.

I believe that the city of Winfield and Tele Pharm will grow a partnership that will take our town forward and help create a strong vibrant town that can grow to its potential. I am looking forward to Tele Pharm opening the doors. This is a big deal for our town and community

Thank You
Chris Finnell
Mayor, Winfield, Iowa

MAYOR:
Chris Finnell
CITY CLERK:
Angie Oepping

CITY OF WINFIELD



COUNCIL MEMBERS:
Ryan Kinneberg
Ryan Rees
Roger Sharp
Jan Walter
Kathy Nelson

August 18, 2015

To Whom It May Concern:

My name is Angie Oepping and I have been the city clerk for the City of Winfield, Iowa since September 2011. My husband and I moved to Winfield in 1997 and have a 13 year old son and a 10 year old daughter. For the past 4 ½ years, I have also been the president of our youth sports league which has been expanding on a yearly basis.

Due to the busy lifestyles that so many parents have, I am excited to see the pharmacy, Telepharm, coming to our town. With working in Winfield and my kids being involved in numerous activities, I can go weeks without leaving town. My son has asthma and takes medicine daily to control it so having a pharmacy in town will be much more convenient when having to fill his monthly prescriptions as well as any other prescribed medication that my family may need. My children currently doctor at the clinic that we have in town and if a prescription is needed, we must travel 40 minutes round trip to get the prescription filled.

With being the city clerk, I feel that Telepharm will be a great addition to our community. We currently have a significant number of elderly residents in our community that will greatly benefit from having a pharmacy in town. It is nice to see an addition to our main street business district.

After speaking with many residents about Telepharm, many of them are just as excited as I am and are looking forward to the opening of the pharmacy.

Sincerely,

Angie Oepping
City Clerk

WINFIELD BEACON/WAYLAND NEWS

**PO Box 10
Winfield, IA 52659**

Cathy Lauderdale, Owner/Editor

To Whom It May Concern:

My name is Cathy Lauderdale and I am the Editor and Owner of the Winfield Beacon/Wayland News. This business is a weekly newspaper with offices in the cities of Winfield and Wayland. I have lived in Winfield for the past 51 years and watched it stagnate for a while and now am enjoying watching it grow.

When Mayor Finnell first introduced the Telepharm concept, I will admit that I was a bit skeptical. After attending numerous meetings where Mayor Finnell and representatives from Telepharm explained the program, I am a firm believer that this program was 'made for Winfield'.

The Winfield community has numerous retired persons living here, some of which cannot drive or will not drive, especially during the winter months. We also have a medical clinic in our community. I have visited with the personnel at the clinic and they too believe that it would be a huge plus for our small community. Not only would this assist our local patrons, but it will also help to build our community for the future by putting another business on our main street.

Since we are a farming community, I believe the Telepharm will benefit not just Winfield, but also the other surrounding communities and farmers.

Right now, Winfield and area residents are required to travel no less than 20 miles to pick up their medications. As I said above, for some, this just is not a possibility. Therefore, I feel that adding this business to our community would be beneficial to all.

The majority of the residents in Winfield feel as I do, that this would be a huge plus for our community.

Very truly yours,

Winfield Beacon/Wayland News



Cathy Lauderdale
Owner/Editor

To whom it may concern:

My name is Marcy Kinneberg and I am the Advocate for the City of Winfield, Iowa. I have been working officially in this part-time capacity for the last year, however, I have always been an advocate for Winfield.

After growing up in the community and attending the Winfield – Mt. Union School, I moved away for a short while to complete my college education only to return after graduation with my soon-to-be husband and to start our own family. We have been happily living in Winfield for the past 10 years and now have 2 children, one of which is going to starting 2nd grade at Winfield – Mt. Union School and the other eagerly awaiting her turn to start school.

I am excited about TelePharm's new venture in town. There is a clear need for access to facilities like this as there are several who require prescriptions. I was not as aware of just how many people require prescriptions until about a year ago. Last year, I was diagnosed with Thyroid cancer and while visiting several offices and with several doctors, I learned that being 'prescription-free' was a bit of a rarity. I would often get a blank stare followed by the words 'Nothing at all' when asked what medications I was taking. Apparently, I was in a minority.

Now that I am on a daily medication, I realize how important it is to have access to a pharmacy and secondly to have the ability to get there. The Betterment Committee conducted a survey a few months ago in which we learned that members in our community are lacking the resources such as time or transportation to go to other towns for things such as groceries or prescriptions. Having Telepharm in town and within walking distance is going to be such an improvement for our residents who are currently going to surrounding cities such as Mt. Pleasant, Washington or Burlington which are over 15 miles away.

I know it will also help me when I'm looking at the bottom of my medicine bottle. Now, I will not have to make a special trip to a neighboring town just to pick up my prescription – I can simply walk a couple blocks to our local Telepharm. That does sound nice!

Kind regards,

Marcy Kinneberg

Winfield Advocate

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on Board's agenda is three weeks prior to Board meeting.

Case No. or State ID No.

Rec'd:

(FOR PHARMACY BOARD USE ONLY)

IOWA BOARD OF PHARMACY
Petition for Waiver Variance
(check the appropriate box)

PLEASE PRINT OR TYPE ALL INFORMATION IN INK

A waiver excuses the petitioner from the requirements of a rule in its entirety or from a part of a rule; a variance does not. Instead, a variance is a modification to the requirements of a rule or a part of a rule. Example: A rule requires the fencing of certain property and further requires that the fence be at least 6 feet in height. A waiver of that rule would excuse the petitioner from the requirement for fencing the property. A variance would require the property be fenced but would allow the petitioner to maintain the current fencing configuration of 5 feet in height (perhaps the fence was constructed prior to the height requirement). When replacement of the current fence becomes necessary as a consequence of normal wear and tear, the variance would terminate and the petitioner would be required to comply with the 6-foot height requirement.

Note: Statutory requirements that have been repeated in administrative rules are not subject to consideration for a waiver or variance.

Is this petition an initial request or is it a request for renewal? Initial Request Request for Renewal
If a request for renewal, explain below why the renewal is necessary.

Petitioner Information (include licensee/registrant name and name of contact person, i.e. pharmacist in charge)

Name: TelePharm / Adam Chesler
a.k.a. Bancroft Pharmacy
Address: 105 Iowa Ave Ste #231

Phone No.: 319-535-0571
(include area code)

City: Iowa City State: IA Zip Code: 52240

Petition Information

1. Chapter Number and Title.

Chapter 9, AUTOMATED MEDICATION DISTRIBUTION SYSTEMS AND TELEPHARMACY SERVICES

2. Rule Number(s) and Title(s).

9.3 (2) *Telepharmacy.*

3. Describe in your own words the essence of each Rule Number(s) and Title(s) that pertains to this petition.

9.11 (2) By waiving rule 657—9.11(2), the Board of Pharmacy would allow a Certified Pharmacy Technician to perform these tasks in place of an AMDS. An independent telepharmacy platform will be used to manage and oversee all telepharmacy operations.

4. Describe the specific nature and scope of your petition. In your description, include the anticipated time period (beginning and ending) for which the petition would apply. A waiver or variance may not be requested or granted on a permanent basis; the petition must identify an end date.

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on
Board's agenda is three weeks prior to Board meeting.

A new pharmacy will be opened with the community to give residents local access to a pharmacist. Please see the attached document with additional information as described in the "Telepharmacy Petition Requirements 5-2014" document.

5. Describe the relevant facts and reasons that, in your opinion, justify and provide "clear and convincing evidence" as to why this petition merits consideration for waiver or variance. In your description, explain why the rule(s) poses an undue hardship. If there is a public health, safety and welfare issue associated with this rule(s), or if this rule(s) addresses security or confidentiality issues, also explain how equal protection will be maintained if this petition were granted.

Telepharmacies in the state have operated safely and successfully since 2012. As the population in these small, rural areas is aging, the residents can benefit from having more direct access to pharmacy services, pharmacist oversight of OTC medication, and direct access to a pharmacist in the community. This is a critical service for the future of rural communities throughout the state.

6. Does anyone else (inside or outside state government) possess knowledge relevant to this petition?

Yes No Do not know

If yes, list their names, addresses and phone numbers below.

7. Would anyone (inside or outside state government) be adversely affected if this petition were granted?

Yes No Do not know

If yes, list their names, addresses and phone numbers below.

8. Do you know how the Board of Pharmacy has treated similar situations?

Yes No

If yes, describe below how similar situations were handled.

Waivers have been granted to the five (5) locations in the state. These locations have been operating safely and effectively for the past three years. This site will conform to the same operating policies and procedures and use the same technology and safety protocols as the existing telepharmacy locations.

9. Have you had any past interaction with the Board of Pharmacy that might impact or relate to this petition?

Yes No

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on
Board's agenda is three weeks prior to Board meeting.

I authorize any person with knowledge of the relevant or important facts relating to this petition to release any
pertinent information to the Iowa Board of Pharmacy. I hereby attest to the accuracy and truthfulness of the
information contained herein.



Petitioner's Signature

10/29/2015

Date

Bancroft Telepharmacy Petition

October 29, 2015

Submitted by:

Adam Chelser, PharmD
Vice President of Operations
TelePharm
105 Iowa Ave Ste #231
Iowa City, IA 52240
(319) 535-0571
adam.chesler@telepharm.com

A. Establish the need for remote pharmacy site (telepharmacy practice)

1. Identify all pharmacies within a 25-mile radius of the proposed remote pharmacy site and distance of each pharmacy from the proposed remote pharmacy site

All pharmacies within a 25-mile radius of the proposed remote pharmacy site:

Walmart Pharmacy
1210 Giant Dr
Blue Earth, MN 56013
31.6m

Blue Earth Drug
125 S Grove St Ste 1
Blue Earth, MN 56013
30.4m

KRHC Family Pharmacy
1519 S Phillips
Algona, IA
17.1m

Hy-Vee Pharmacy
1500 Highway 169N
Algona, IA 50511
15.1m

2. Distance to the pharmacy nearest to the proposed remote pharmacy site

15.1 miles

3. Distance between the managing pharmacy and the proposed remote pharmacy site

225 miles

4. Population of the community

727

5. Is the community in a critical access area

No

6. Identify prescribing practitioners currently practicing in the community, if any

Kossuth Regional Health Center Bancroft Clinic

Jennifer VonBank, PA

7. Average number of prescriptions per day anticipated

20-40 prescriptions

8. If there was a pharmacy formerly located in the community, when did the pharmacy close and how long had the pharmacy been located in the community? Is there currently a pharmacy in the community with plans to close? If so, when is the anticipated closing?

The previous pharmacy closed more than 10 years ago

9. How and from where do residents of the community currently obtain their prescription medications?

Most residents travel to Algona to the Kmart or Hy-Vee.

10. Will the remote pharmacy site be located in a medically underserved area (per federal definition)?

No

11. Will the remote pharmacy site be located near a rural health clinic (per 42 USC § 1395)?

Yes, Kossuth Regional Health Center Bancroft Clinic

12. Will the remote pharmacy site be located near a federally qualified health center?

No

13. Will the remote pharmacy site be located near a health care facility?

Yes, Kossuth Regional Health Center Bancroft Clinic

14. Will the remote pharmacy site provide unique services that are not available from other area pharmacies?

No

B. Remote pharmacy site operational plan (submitted with initial license application)

1. Name and address of managing pharmacy and remote pharmacy site

Managing pharmacy

NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

Remote pharmacy site

Bancroft Pharmacy
122 W Ramsey St
Bancroft, IA 50517

2. Will automated dispensing equipment be used to dispense prescription drugs from the remote pharmacy site? If so, what type of automated system will be used and to what extent will dispensing be automated?

No automated dispensing equipment will be used to dispense prescription drugs from this remote pharmacy site.

3. Name and address of owner(s) of managing pharmacy and remote pharmacy site

Managing pharmacy

NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

Remote pharmacy site

TelePharm
105 Iowa Ave, Ste 231
Iowa City, Iowa, 52240

4. Name and address of pharmacist in charge of managing pharmacy and remote pharmacy site

Pamela Wong Wiltfang
NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

5. Name and address of certified pharmacy technician who will be the technician in charge of the remote pharmacy site

This will be determined after approval of this site, and will be submitted with the initial license application.

6. Identification of all remote pharmacy sites managed by the managing pharmacy

NuCara Pharmacy State Center, IA

NuCara Pharmacy Zearing, IA

7. Scale drawing of the remote pharmacy site that illustrates the following:

- a. Layout and location of all systems and system components**
- b. Location of patient counseling area**
- c. All access points to the electronic record-keeping system and drug inventory**

The location will be constructed using a standard pharmacy layout including a full community pharmacy prescription department, an OTC department for basic medical supplies, and a private clinical consultation room to be used for patient counseling and other private activities. It will also be handicapped accessible and secured with 24/7 motion and alarm systems. The details of this location will be determined after approval of this site, and will be submitted with the initial license application.



8. Description of the proposed telepharmacy practice including days and hours of operation and the remote pharmacy site's anticipated opening date

Please see Appendix A for the description of the telepharmacy practice. The anticipated opening date will be September, 2016.

9. Policies & Procedures for the telepharmacy service

Please see Appendix B for the Telepharmacy Policies & Procedures

10. Proposed staffing, identifying all individuals/positions involved with the telepharmacy service from the managing pharmacy and the remote pharmacy site, and including the responsibilities of each staff member

- a. **All technicians practicing at the remote pharmacy site must be nationally certified and registered with the Board**
- b. **All technicians practicing at the remote pharmacy site must have a minimum one year of Iowa pharmacy practice as a pharmacy technician**

The proposed staffing will be determined after approval of this site, and will be submitted with the initial license application. Our target technician will have 5+ years of experience. Prior to opening the technician will work in an established telepharmacy for training.

11. Plan for training personnel practicing at managing pharmacy and remote pharmacy site

The personnel which will oversee the remote pharmacy site from the managing pharmacy all have experience working with the remote pharmacy sites currently operating in Iowa.

The technicians hired to work at the remote pharmacy site will train in an operating telepharmacy during the month prior to starting at the remote pharmacy site. They will be trained according to best practices and standard operating procedures developed at these locations.

12. Identification and description of technology and communication systems to be used between the managing pharmacy and the remote pharmacy site

EnterpriseRx dispensing and Point-Of-Sale system will be used for general operations. The telepharmacy software for remote verification and patient counseling will be provided by TelePharm. EnterpriseRx has been chosen because of the 2-way interface between TelePharm and EnterpriseRx. The data between both systems will have an identical patient database that can be accessed in both sites in real-time. Technicians and Pharmacists both have unique username and passwords with specific roles. For example a pharmacist will have every patient's full profile readily available from any remote dispensing site which they are assigned to oversee.

- a. **Type of audio-visual link and communication will be utilized between the managing pharmacy and the remote pharmacy site**

The audio-visual link that will be utilized is a HIPAA-compliant peer-to-peer secure HD video conferencing protocol utilized in TelePharm's technology platform. This technology is in over 100 pharmacies in 8 different states with 100% success rate of pharmacies operating.

- b. **Will the link between the managing pharmacy and the remote pharmacy site be a constant, live, or real-time connection; if not, how and when will the link be activated; will the pharmacist be able to open a visual or audio**

link from the managing pharmacy without the assistance or interaction of the remote pharmacy site personnel

There will be a live camera feed showing an overview of the pharmacy and the operations which will be readily available by the pharmacist at all times. They will be able to open this link from the managing pharmacy without the assistance or interaction of staff at the remote pharmacy site. In addition, a real-time connection will be made on demand between the pharmacist and patients, as well as technicians. This link can be initiated by pharmacists, technicians, or patients.

c. Will multiple camera views be available from the remote pharmacy site; who controls the camera views

Yes, multiple camera views will be available. The pharmacist at the managing pharmacy can control these camera views. Every part inside the pharmacy will be viewable from the cameras.

d. Will bar-code technology be utilized; if so, how and by whom

Yes, there will be two different bar-code technologies utilized at the telepharmacy:

1. Each prescription has a bar-code which needs to be scanned to open the prescription and begin the filling process
2. The NDC on the stock bottle will need to be scanned prior to filling the prescription
3. Each person who accesses TelePharm's system will have a unique user-id and password. Every action within the TelePharm system is tracked from opening a prescription record, capturing images and initiating counsel sessions.

13. Drug and record security and confidentiality at the remote pharmacy site

All employees will receive additional training pertaining to drug and record security and confidentiality. Additional areas of focus will include patient privacy, FWA, and cultural competency. Data will be transmitted through a HIPAA-compliant secure HTTPS connection to our data servers and stored using 256-bit AES encryption. Standard operating procedures will also be implemented to ensure drug and record security and confidentiality.

14. Record-keeping systems and location

a. Type of electronic/digital record-keeping system with the remote pharmacy site utilize for tracking and recording of dispensing activities and telepharmacy communications

b. Length of time that recorded data will be retained

Enterprise RX software will be utilized for record-keeping to track and record dispensing activities. The Enterprise RX system has a two-way integration into the telepharmacy system provided by TelePharm. Telepharmacy communications will be tracked and recorded through TelePharm software. Recorded data will be retained for a minimum of 10 years. All data and audit logs are readily available and our mirrored databases within both systems to the managing pharmacy.

15. Drug inventory and control

a. Will the remote pharmacy site maintain a stock supply of prescription drugs

Yes, the remote pharmacy site will maintain a limited stock supply of prescription drugs. The specific formulary for this location will be determined based on the need of the patients in the community.

b. Will the remote pharmacy site stock and dispense controlled substances; if so, where and how will controlled substance stock be maintained

Yes, the remote pharmacy site will maintain a limited supply of controlled substances. The specific formulary for this location will be determined based on the needs of the patients in the community. Controlled substance stock class 3-5 will be dispersed throughout the regular inventory, and will be checked bi-annually through inventory. Ordering trends will be monitored from the corporate office. CII drugs will only be ordered and stored on a requested basis by the local clinics/physician. CII drugs will be kept in a locked, secure location and a perpetual inventory will be kept and inspected on at least a monthly basis.

c. How will drugs be packaged for dispensing to the patient and who will package and label the patient's prescription

All prescriptions will be packaged and labeled by the certified pharmacy technicians working on-site at the remote pharmacy site. They will only be dispensed to the patient after they are verified by the pharmacist.

d. How often will noncontrolled prescription drugs be inventoried and by whom

The pharmacist will inventory the noncontrolled prescription drugs perpetually with software, and will conduct a manual inventory bi-annually.

e. How often will controlled substances be inventoried and by whom (suggest pharmacist in charge or pharmacist designated by pharmacist in charge)

The Pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge will ensure controlled substance inventory counts are recorded. Class 3-5 controlled substances will be monitored perpetually in the software, and reconciled bi-annually. CII inventory will be monitored perpetually in the software and will be reconciled at least once monthly.

f. If a perpetual inventory for controlled substances is utilized, who will reconcile the perpetual inventory to the physical inventory and how frequently (suggests monthly reconciliation by pharmacist in charge or pharmacist designated by pharmacist in charge)

Perpetual inventory will be utilized for controlled substances located at the remote site. Class 3-5 controlled substances will be reconciled biannually by the pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge. For Class 2 controlled

substances, the pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge will reconcile the CII inventory at least monthly.

16. Scope of clinical pharmacy services to be provided at remote pharmacy site and who will provide those services

A comprehensive guide of services will be provided on-site, and tailored to the community's needs based on dialogue and relationships with the local prescribers and other healthcare providers. These services may include but are not limited to:

1. Medication Therapy Management
2. Comprehensive Medication review
3. Immunizations
4. Drug/Disease state education
5. Respiratory therapy
6. Durable medical equipment
7. Direct video link into clinic for clinical pharmacy services
8. Point-of-care testing with pharmacist on-site
9. Medication Synchronization

17. Continuous quality improvement plan and how it will be implemented and utilized

The pharmacists on duty for telepharmacy and the technician at the telepharmacy will be responsible for recording Continuous Quality Improvement (CQI) data to include metrics such as consultation and error rates. The staff will also utilize third party reporting for quality events. CQI events will be monitored from the corporate level to determine adjustments to best practices in order to prevent further occurrences.

18. System downtime plan and procedures

The telepharmacy cannot operate if the audio / visual link cannot be established and no prescriptions may be filled or dispensed. All dispensing activities will halt until the audio / visual link can be re-established. A cellular backup connection will be evaluated depending on the speed and reliability.

19. Processes for ensuring safety and security of patients and staff

Disaster preparedness plans will be included in the training for pharmacy staff. These plans include processes to ensure the safety and security of patients and staff. Additionally, cameras will be placed throughout the store.

20. Patient counseling process including plans to ensure security of patient information and privacy for discussions with patients

Managing Pharmacy will install telepharmacy audio / visual equipment from TelePharm. This equipment will provide an audio / visual link between the managing and remote location and also allow for HIPAA compliant counseling of patients. Patient counseling will be required and enforced with Telepharm software, compliant with Iowa consultation laws.

21. How toll-free telephone service will be provided and available to patients for direct contact with the managing pharmacy

Signs will be placed throughout the store alerting customers how to contact the managing pharmacy. Additionally, a pharmacist will always be available at the managing pharmacy through the TelePharm software to communicate with patients. Any calls coming into the remote pharmacy can easily be transferred directly to the pharmacist.

22. Schedule and process for periodic inspection of remote pharmacy site

a. How often will a pharmacist from the managing pharmacy inspect the remote pharmacy site

A pharmacist from the managing pharmacy will inspect the remote pharmacy site at least once per month.

b. What will be included in periodic inspection at the remote pharmacy site and who will conduct the inspection

Please see Appendix C for the monthly inspection checklist which will be conducted by a pharmacist from the managing pharmacy.

c. What will be the process to address discrepancies

Discrepancies will be followed with an immediate action plan to resolve and prevent further discrepancies. All reporting from each inspection will be reported to the corporate office for further evaluation.

23. Identification of information and data that will be provided in periodic reports to the Board

The telepharmacy site will provide the Board with periodic reports including, but not limited to, the following information:

- Documented information regarding specific pharmaceutical services provided to patients at the remote pharmacy site
- Number of prescriptions dispensed from the remote pharmacy site
- Number of prescriptions which came directly from the local clinic
- Identification of errors in dispensing from the remote pharmacy site by type of error and actions taken to resolve and prevent future errors by type
- Information regarding interactions with prescribers and community outreach efforts to patients and prescribers
- Successful counseling rate at the remote pharmacy site including comparison with counseling rate at the managing pharmacy
- Number of hours a pharmacist was physically present at the remote pharmacy site
- Number of hours the remote pharmacy site was open for business
- Plans for future onsite pharmacist staffing and criteria used to determine the need for onsite pharmacist staffing
- Patient surveys on satisfaction and care received

24. Specific identification of “technician in charge” – include qualifications

The “technician in charge” at the telepharmacy will be determined after approval of this site, and will be submitted with the initial license application.

25. Prohibit the OTC sale of controlled substances from remote pharmacy site when the pharmacist is not physically on-site

No OTC controlled substances will be sold from the remote pharmacy site when the pharmacist is not physically on-site.

26. Prohibit a pharmacist intern from practicing at the remote pharmacy site unless a qualified pharmacist is physically present at the remote site to supervise the pharmacist intern

Pharmacist interns will not be allowed to practice at the remote pharmacy site unless a qualified pharmacist is physically present at the remote site.

Appendix A: Description of the Telepharmacy Practice

This location will be implemented according to a proven template for telepharmacy operations that has been used in the current telepharmacy sites, specifically the Zearing and State Center locations. The pharmacist will be on site for face-to-face interactions with patients at least one day per month.

- The pharmacist will be physically located at the Managing Pharmacy and will be readily available to the technicians and patients at the Telepharmacy Site at all times. The pharmacist will continue to have ultimate authority over the dispensing process.
- The prescription department will be staffed by certified pharmacy technicians. The pharmacist-technician relationship will remain important as the pharmacist will utilize new technologies and the leadership of head technicians to maintain safety protocols for patients.
- All pharmacy technicians working at the telepharmacy site will be required to obtain and maintain current Certified Pharmacy Technician (CPhT) status through the Pharmacy Technician Certification Board (PTCB). They will also be required to have the following:
 - Minimum of two years experience working in an Iowa pharmacy
 - Must adhere to all other rules and regulations set forth by the Iowa Board of Pharmacy
- Technicians will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules
- Prescriptions will be filled according to all the standard operating procedures of a pharmacy. As the technician is filling the prescription, they will capture images of all steps which require pharmacist verification to provide to the verifying pharmacist. These images, along with any other documentation, will be sent to the pharmacist to verify the dispensing and clinical accuracy of the prescription. The prescription must be verified by the pharmacist before it is able to be dispensed to the patient.
- All of the information about the prescriptions filled at the Telepharmacy will be recorded and maintained in secure records with redundant backups for 10 years. This audit trail is readily available for any prescription processed at the Telepharmacy.
- A supervisor will travel to the Telepharmacy site once per week for the first month of operation to ensure policies and procedures are being followed.
- A pharmacist will travel to the Telepharmacy at least one time per month to perform a detailed inspection at the site and have face-to-face time with patients. While the pharmacist is on site, (s)he will verify all policies and procedures are being properly followed. When a pharmacist is not available on site, all verification and counseling will be provided by an Iowa licensed pharmacist.

- Medication counseling and responding to patient questions will be completed through a secure video connection in a private area when the medications are dispensed to the patient. Pharmacists will be readily available for consultation with patients, prescribers, and other care providers through a secure video connection. All patients will be required to review prescription information that includes side effects and warnings prior to the counseling session. All new prescriptions will require pharmacist counseling.

An Iowa licensed pharmacist at the managing pharmacy will remotely verify prescriptions and counsel patients. The pharmacist will be on site to visit each telepharmacy at least monthly, and pharmacist presence will increase as patient growth allows in order to maximize the in-person pharmacist-patient relationship.

Experienced Certified Pharmacy Technicians (CPhT) will be hired to work at the telepharmacy. There will be at least 1 technician staffing the location daily, with an additional technician on call as needed. Every effort will be made to hire technicians who reside in or around the community for ease of commute and connection to the community.

The telepharmacy will initially have approximate hours from 9:00am - 5:00pm Monday through Friday with variations depending on specific community need. Evening hours as well as Saturday hours will be considered.

Appendix B: Telepharmacy Policies & Procedures

POLICIES

1. Managing Pharmacy will operate and maintain a local telepharmacy that will provide access to critical pharmacy services to the community.
2. Managing Pharmacy will ensure that all Iowa Board of Pharmacy telepharmacy rules (Chapter 9) are followed while operating as a telepharmacy, with the exception of the waiver of the AMDS requirement
3. Managing Pharmacy will ensure that available technology is utilized in the operation of the telepharmacy location to protect the health and safety of all patients.
4. All Managing Pharmacy Operational Policies and Procedures will apply to the telepharmacy unless contradicted by the specific telepharmacy procedures as described in this section.
5. All pharmacy technicians working at the telepharmacy sites will be required to obtain and maintain current Certified Pharmacy Technician (CPhT) status through the Pharmacy Technician Certification Board (PTCB). They will also be required to have the following:
 - a. Minimum of one year experience working in an Iowa pharmacy
 - b. Training in a telepharmacy setting before beginning at the remote pharmacy site
 - c. Must adhere to all other rules and regulations set forth by the Iowa Board of Pharmacy
6. Technicians will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules
7. Technicians will be responsible for recording Continuous Quality Improvement data to include metrics such as consultation and error rates.

PROCEDURES

1. Pharmacy Overview
 - a. Managing Pharmacy will maintain a licensed community pharmacy.
 - b. The Pharmacist in Charge (PIC) in the community will be responsible for the oversight and operation of the telepharmacy. The PIC will be a pharmacist from the Managing Pharmacy location that has been previously trained on telepharmacy policies and procedures.
2. Personnel Responsibilities
 - a. The PIC will be responsible for the oversight of the telepharmacy operation. The PIC will develop and maintain the Operational Policies and Procedures of the telepharmacy and is responsible for training the staff of the telepharmacy and the managing pharmacists in the legal and safe operation of the telepharmacy.

- b. While operating as a telepharmacy, the pharmacy will be staffed with a Certified Pharmacy Technician at all times. The CPhT will be responsible for all technical functions performed at the telepharmacy. The technician will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules.
 - c. The current pharmacist on duty for telepharmacy will be responsible for ensuring the accuracy and validity of all prescriptions dispensed by the telepharmacy. The pharmacist will also be responsible for providing counseling to all patients at the telepharmacy for new prescriptions and as requested for refill prescriptions, OTC medications, or other health information questions.
 - d. The pharmacists on duty for telepharmacy and the technician at the telepharmacy will be responsible for recording Continuous Quality Improvement data to include metrics such as consultation and error rates.
 - e. The PIC of the telepharmacy will ensure monthly controlled substance inventory counts are recorded.
3. Technology Safeguards
- a. Managing Pharmacy will install telepharmacy audio / visual equipment from TelePharm. This equipment will provide an audio / visual link between the managing and remote location and also allow for HIPAA compliant counseling of patients. The telepharmacy cannot operate as a telepharmacy if the audio / visual link cannot be established and no prescriptions may be filled or dispensed.
 - b. The technician at the telepharmacy site will utilize barcode technology and the Tech Check module in the dispensing software to verify the products of all prescriptions filled.
 - c. The telepharmacist on duty at will use the audio / visual link to check the hard copy of new prescriptions, the prescription label, and the contents of the package. The pharmacist will be responsible for the accuracy and validity of the finished prescription product and marking it as complete in the TelePharm software.

Appendix C: Pharmacist Monthly Inspection Checklist

Telepharmacy Site _____ DayTime of Visit _____

Inspected By _____

| | Checklist Item | Y/N | Comments |
|----|---|-----|----------|
| 1 | Is a notice conspicuously displayed on the registered pharmacy premises detailing the name and registration number of the responsible pharmacist and the fact that a pharmacist is accessible for consultation at any time? | | |
| 2 | Are pharmacy technicians following proper Consultation procedure? | | |
| 3 | Audit 20 filled prescriptions, are they accurate? | | |
| 4 | Audit 10 hard copies, is proper documentation being observed | | |
| 5 | Observe technicians filling a prescription, are proper SOP being followed? | | |
| 6 | Are customers greeted immediately upon entry? | | |
| 7 | Are proper inventory control SOP being followed? | | |
| 8 | Check 10 shelf bottles on shelf, are any of them expired? | | |
| 9 | Are all staff in clean and proper uniforms and nametags are prominently visible? | | |
| 10 | Is the CII cabinet locked and the key stored appropriately? | | |
| 11 | Are patient required references in clear view? | | |
| 12 | Is the filling area clear and uncluttered? | | |
| 13 | Is the store area clear and uncluttered? | | |
| 14 | Walk the perimeter, are there any concerns? | | |
| 15 | Are the bathrooms clean and tended to? | | |

P.O. Box 157 105 E. Ramsey St.
Bancroft, Iowa 50517
Phone: (515) 885-2382



www.bancroftiowa.com
E-mail: info@bancroftiowa.com
bmu@bancroftiowa.com

October 12, 2015

Iowa Pharmacy Board

Re: Pilot project for Telepharmacy

I am Tom Johnson, the current Mayor for the City of Bancroft. There is not a better city that you could choose to be part of a pilot project for telepharmacies in Iowa. Bancroft is the local trade center for the north half of Kossuth County serving over 3000 people. In 2006, Bancroft saw the need for a clinic and worked with Kossuth Regional Health Care to make that a reality. Business at the clinic will only increase with a pharmacy in town. Currently the closet pharmacy is 16 miles away, yet some residents will travel even further. Acute illnesses and preventative medicine care will increase at our local clinic and people will appreciate the opportunity to have a pharmacy in town. We do not preach support for local businesses, we do it.

Bancroft will be a leader in telepharmacy and rural healthcare options. It is important that you review the advantages that a telepharmacy will bring to local, rural communities and vote yes to a pilot program including Bancroft in Iowa.

Sincerely

A handwritten signature in black ink, appearing to read "Tom Johnson", with a long horizontal flourish extending to the right.

Tom Johnson, Bancroft Mayor

P.O. Box 157 105 E. Ramsey St.
Bancroft, Iowa 50517
Phone: (515) 885-2382



www.bancroftiowa.com
E-mail: info@bancroftiowa.com
bmu@bancroftiowa.com

October 12, 2015

Iowa Pharmacy Board

Re: Pilot project for Telepharmacy

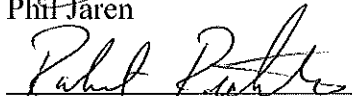
The City Council of Bancroft, Iowa is in full support of Telepharmacies in Iowa and especially of one locating in Bancroft. We are a progressive community that not only meets the needs our residents but those of our neighboring communities. A telepharmacy will have a positive impact for the people, other businesses, our county and the state. We are excited to be a part of this new technology and Bancroft will be the model of success that you will refer to.

We the undersigned, whole heartedly support Telepharm and a telepharmacy in Bancroft, Iowa



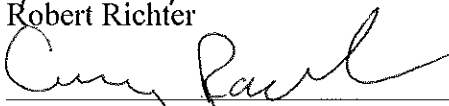
Phil Jaren

Date: 10-12-15




Robert Richter

Date: 10/12/15



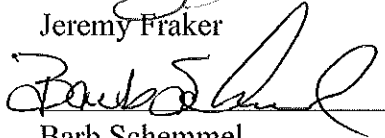
Corey Rasch

Date: 10/12/15



Jeremy Fraker

Date: 10/12/15

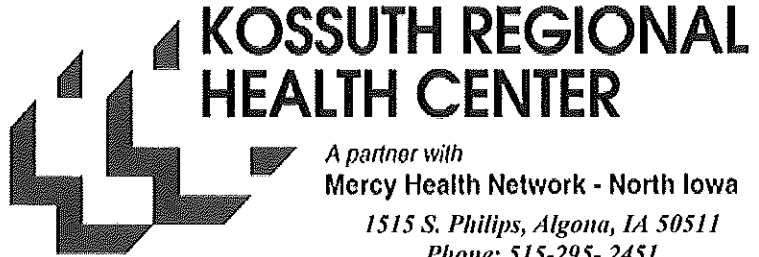


Barb Schemmel

Date: 10-12-15

October 5, 2015

Iowa Board of Pharmacy
400 SW Eighth Street, Suite E
Des Moines, Iowa 50309-4688



To Whom it May Concern:

I am pleased to write in support of the City of Bancroft's efforts to implement a tele-pharmacy. As the Administrator of Kossuth Regional Health Center, I have become very well aware of the current healthcare services that exist within the Bancroft area. Kossuth Regional Health Center encompasses a critical access hospital as well as a family practice clinic, home health, public health, hospice and retail pharmacy all located in Algona, 16 miles south of Bancroft. We are pleased to operate a satellite family practice outreach clinic within Bancroft which is staffed by a full-time physician assistant. This clinic provides access to basic primary care needs of the residents of the Bancroft community and surrounding area seeing approximately 3,600 patients per year.

As we have continually evaluated ways to improve care to the Bancroft area, consideration has been given to whether we would be able to implement a retail pharmacy operation in the community. Unfortunately, the realities of operating a retail pharmacy within a small community would not generate nearly enough volume to make a traditional retail pharmacy viable.

When we were contacted by leaders within the Bancroft Community regarding the prospect of a telepharmacy, we found that the model being proposed fits well within the needs and constraints that we have encountered for the community. Further, the partnership being considered with TelePharm would allow for the implementation of this service in a manner that meets the needs of all concerned.

Currently, patients that are seen in our Bancroft Clinic have limited choices regarding how their prescriptions would be filled. They can either travel to a pharmacy (closest one in Algona) or rely on delivery service. This arrangement would offer the ability to use reliable technology to establish the necessary personal relationship with the patient while also doing so in a manner that drastically reduces operating costs.

KRHC is very supportive of this model as it provides much needed access to a pharmacy for the community which further improves patient care. We wholeheartedly encourage your support of this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Curtis".

Scott Curtis
Administrator

Crysti Neuman

From: info <info@ftsbbancroft.com>
Sent: Wednesday, October 07, 2015 12:24 PM
To: 'Crysti Neuman'
Subject: October 7, 2015

October 7, 2015

Iowa Pharmacy Board

To whom it may concern;

My husband and I would like to take this opportunity to say that we are in full support of the city of Bancroft, IA obtaining a tele-pharmacy, the need is here!

I have lived in Bancroft all of my 63 years and plan on living here the rest of my life. I currently am employed by the local bank and have been for over 40 years. I use the local medical clinic and wish to continue to do so. If ever the need is for a prescription we have several options, we can take time off work and drive the 20 miles one way and pick it up, we can have someone else go and pick it up, or we can have it sent up to Bancroft which means another day without the medication.

My husband has had extensive surgeries due to lung cancer and he does not drive out of town so it is not feasible for him to drive and pick meds up. My night vision is not so great so driving after work in the winter is not feasible for me and we do not know what kind of weather there will be.

Please add Bancroft to the list as one who will have a tele-pharmacy, I know for a fact that we will use it 100% for all of our prescription needs.

Thank you.

Sincerely,

David and Eileen Hagist
405 S. Walnut St.
Bancroft, IA 50517

To Whom it May Concern,

My name is Chris Doerning and I am the Chamber Director in Bancroft as well as an elementary teacher and mother of 3 children. I have lived in Bancroft for 12 years. I have seen many businesses open their doors in Bancroft over the years and have flourished thanks to the support of the community and other local business owners.

When I first arrived in Bancroft we had a pharmacy that was utilized by the community and the Heritage nursing home. Unfortunately, the owner retired and closed doors. It was a huge loss to the community. A few years after the closing of the pharmacy, we opened the Kossuth Regional Health Center Clinic in Bancroft. I have used this facility only a handful of times due to the fact that I have to drive into Algona for my prescription meds, so it is just easier to doctor there and pick up my prescription there. I recognize that the aging population in Bancroft doesn't always have the luxury of being able to drive and family members cannot always make a quick trip to Algona and back (32 miles) to pick up the prescription. I believe that bringing the pharmacy back to Bancroft will help loved ones take care of their aging parents better, with less stress, allow seniors to be more independent and allow busy parents to receive prescriptions in the same town they are seen by a doctor.

Thanks for Your Time,

Chris Doerning



WELP, INC.

P.O. BOX 77, BANCROFT, IOWA 50517-0077
PHONE: 515-885-2345 FAX: 515-885-2346d

October 7, 2015

I am Sandy Welp. My husband, Kurt, and I are owners of a small family business, Welp Hatchery, which was started by his grandfather in 1929. Welp Hatchery is located in Bancroft. We have approximately 40 employees.

We are both lifelong residents of Bancroft. My husband volunteered on the local fire department for over 18 years and also was an EMT for Bancroft's local ambulance service for 10 years. Quality health care is very important to both of us.

We are thrilled to have a new pharmacy business in Bancroft! We use the Bancroft medical clinic for our personal and business needs. Having a pharmacy in Bancroft to pick up prescriptions immediately will greatly reduce the travel time and costs.

I have an aging parent and this will have a huge impact for her purchasing prescriptions.

The whole community of Bancroft as well as several surrounding communities will benefit from a pharmacy here in town.

Sincerely,

Sandy Welp

October 5, 2015

Iowa Pharmacy Board

RE: Possibility of Pharmacy business locating in Bancroft, IA

I am an 83 yr. old woman living alone in my own home in Bancroft, IA. I was born and raised here, moved away for my husband's job for 20 years and moved back when he retired 24 years ago. Since he passed away 17 years ago, it is very inconvenient for me to go 18 miles for a prescription when I am ill. A local pharmacy would certainly be a blessing for me.

We have a great medical clinic located here in Bancroft, so a pharmacy would certainly compliment our community. The wonderful local nursing home and assisted living units that we have would also benefit from a pharmacy located here.

Our community is very progressive and we try to have the businesses that our aging population needs. We have many younger couples with small children in our community also and it would be much more convenient for them.

Please give this serious consideration and then grant the approval for this pharmacy.

Thank you for your consideration.

A handwritten signature in cursive script that reads "Darlene Jansen". The signature is written in black ink and is positioned above the typed name and address.

Darlene Jansen
201 S. Summit
Bancroft, IA 50517

**City of Ledyard
P.O. Box 23
Ledyard, IA 50556**

2 October 2015

To Whom It May Concern:

SUBJECT: Tele-pharmacy

This is a letter in support of the City of Bancroft's efforts to secure a tele-pharmacy.

I am the mayor of Ledyard and have lived in Kossuth County for the past 20 years. As a mayor and long-time resident, I understand the difficulties many people in my community, especially the elderly, endure to receive medical care. The Bancroft medical clinic has been a life-saver as well as a true service to northern Kossuth County.

Likewise, the proposed tele-pharmacy would add an excellent improvement in medical service to the people living in the northern end of Kossuth County. Currently, residents in our community need to travel more than 30 miles secure prescriptions. The amount of time, trouble and expense during time of illness is more than inconvenient. A local pharmacy would save both time and money, and be a source of reassurance for many, knowing that prescriptions would be prepared in a timely and convenient manner.

For myself, I use the Bancroft clinic. But when I need prescriptions filled, I need to drive on to Algona, another 15 miles, or wait a day or two until Kossuth Regional Health Center Pharmacy can deliver the prescription to Bancroft. Either way, I currently need to make an additional trip to get my prescription filled.

In discussions with community members, all agree that the proposed tele-pharmacy would a true asset to the people living in Kossuth County.

If I can be of any additional assistance in the matter, please do not hesitate to contact me.

Sincerely,

Sharon Hackenmiller Cowin
515.646.2151 or 515.320.3222

**BANCROFT COMMUNITY
ECONOMIC DEVELOPMENT COMMISSION**
BANCROFT, IOWA 50517

To Whom It May Concern,

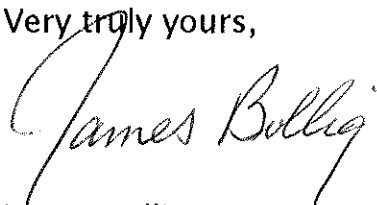
Bancroft Community Economic Development Commission is an advisory arm of the Bancroft City Council. We provide the council input on matters of the revolving loan fund, tax abatement and TIF.

In addition, we work directly with existing businesses or businesses that may have an interest in expanding to or relocating to Bancroft. Attracting a pharmacy has been a priority since the loss of our pharmacy in 2007. The biggest impediment has been the cost of a full-time pharmacist and the need for 130-150 prescriptions a day. In 2008 there was a significant effort that was embraced by the community with a broad based fund-raising. The purpose of raising the funds was a show of good faith to prospective pharmacies and pharmacists. Nothing became of that effort and the funds were returned to the donors. The need, however, is still there.

The Kossuth Regional Health Clinic in Bancroft is doing well but would be strengthened by a pharmacy in Bancroft. Many people travel to Algona or other area doctors when the treatment will likely need an immediate prescription. A local pharmacy would provide our families with immediate assistance with their prescriptions without additional travel. This will make our clinic more attractive while enhancing main street traffic.

Please look favorably upon Bancroft's application. You will not be disappointed in the support this community will provide this telepharmacy.

Very truly yours,



James Bollig

Bancroft Community Economic Development Commission
President

October 7, 2015

Iowa Pharmacy Board

To whom it may concern,

I would like to express my full support in the city of Bancroft, Iowa obtaining a pharmacy. My husband and I moved to Bancroft in 2013 and one of the few amenities missing from the community is a pharmacy. Currently we are able to have our health needs met through our local health care facility but to receive a prescription, we must drive 20 minutes or more. This is a hardship as it causes more time away from our jobs, possibly driving when not feeling well, or having to wait until late evening or even the next day to be able to obtain the medicine. The weather may certainly affect the time it can take to get a prescription as well. Having a pharmacy directly in Bancroft would alleviate all of these issues.

Please consider adding Bancroft to the list of cities that have/will have a tele-pharmacy. A pharmacy in Bancroft, Iowa is a greatly needed addition to the community as it will also aid others in our rural area in reducing their time and effort to obtain medication.

Thank you for your consideration.

Sincerely,

Rebecca Oppedal

10-4-2015

Barb Schemmel
514 S. Portland St.
Bancroft, IA 50517

To whom it may concern,

I am the newest member of the Bancroft city council. Living in Bancroft for the past 15 years I have come to value the traditions of a small town. A small town that does it's best to give its residents the best town possible. Since moving to Bancroft I have always worked in town. I currently work at Nyman TV & Furniture, working full time does not allow me to run to another town to get my prescriptions filled in a timely manner.

Having a pharmacy in Bancroft would be such a great convenience. Right now if I need a prescription it is necessary for me to call the clinic and have it brought up, which is usually the next day. An example of what could happen with prescription, I recently needed a prescription filled and was busy at work and never got it ordered. I did finally call the prescription in on Saturday and was able to go to Algona and get it picked up. If a prescription is needed immediately because of an illness then I would need to make a trip to Algona to retrieve my medications. A trip to Algona when you are not feeling well and should probably be in bed.

I feel that having a tele-pharmacy in Bancroft would be so helpful. We would have more of our residents getting prescriptions here and in turn would spend more here. Instead of getting groceries in Algona while they wait for their medications they could shop here instead. The residents of the towns in the surrounding area would have a chance to get their medications sooner and possibly spend their money here instead of Algona or other larger town. All small towns need to give everyone the opportunity to shop local and keep the small businesses running. Bancroft would very much like to be on the starting edge of the concept of a tele-pharmacy.

As a resident of Bancroft look forward to working towards a tele-pharmacy in Bancroft.

Sincerely,

Barb Schemmel

spa-dee-dah, too!
PO Box 177, Bancroft, Iowa 50517
515-885-2spa

Iowa Board of Pharmacy
400 SW Eighth Street Suite E
Des Moines, Iowa 50319-4688

October 2, 2015

To Whom It May Concern:

This letter is in support of the Telepharm Application for Bancroft, Iowa. In addition, to currently owning a business on main street, I have been involved for over thirty years in organizations such as Bancroft Economic Development, Chamber of Commerce, Rotary, Bancroft Childcare Board and numerous others.

There are numerous effective ways to portray the positive effect a pharmacy would have on the community and area, as well as, the extensive support a pharmacy would receive from the Bancroft community and surrounding areas. A brief history of my firsthand experience may be the most effective way for me to communicate the extensive support.

Bancroft was home to a pharmacy until December 2007, closing due to owner's personal circumstances. In 2008, in response to a series of broad based community meetings, 114 people gave actual checks in the amount of \$250.00 each to show their pledge to support the establishment of a new pharmacy in Bancroft. After extensive study and research, the checks totaling \$28,500 were returned to owners due to the lack of progress in securing a pharmacy.

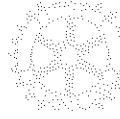
In 2012, renewed efforts by a community group met extensively with experts from the Mercy Health Care System in Mason City, Iowa to determine the feasibility of partnering with Kossuth Regional Health Center to establish a pharmacy in Bancroft. It was determined by KRHC and Mercy Systems that it was not feasible at that time. For a second time, the cost of securing a full time pharmacist to serve the community was cost prohibitive. At that time, KRHC agreed to next day prescription delivery service from Algona to Bancroft Medical Clinic.

Advancements in technology, along with the business plan developed by TelePharm now makes it possible for Bancroft, a rural community, to have a pharmacy.

Respectfully Submitted,

Ellengray Kennedy

Bancroft Area Rotary



September 29, 2015

Dear Members of the Iowa Pharmacy Board:

In a small town rural setting medical services are often limited. The town of Bancroft lost its pharmacy a number of years ago when our pharmacist relocated to a large city. That forces our residents to travel 15 miles to the nearest pharmacy.

Our city director is actively researching the possibility of securing a tele-pharmacy for our town. The city director and a committee are going to visit Iowa communities that have a tele-pharmacy. Health care for our residents would be enhanced with the addition of a tele-pharmacy in our community. Bancroft residents have also been very loyal supports of our local business, so would show their patronage for a tele-pharmacy in our town.

Thank you for all the support you can give to our community of Bancroft in procuring a tele-pharmacy that would be a great asset to our town.

On behalf of the Bancroft Area Rotary, I am happy to address the need of our rural town in northern Kossuth County.

Sincerely,

Eileen F. Kadow

Bancroft Area Rotary President
Eileen F. Kadow
512 E. Ramsey St
Bancroft, IA 50517
515-885-0206

September 30, 2015

Crysti Neuman
City Manager
City of Bancroft
P. O. Box 157
Bancroft, IA 50517

Dear Crysti:

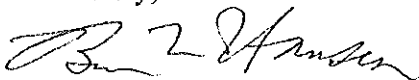
Iowa Area Development Group (IADG) is pleased to assist the City of Bancroft in attracting the Telepharm project to your community. As you know, IADG has worked with the City for many years on business and community development efforts. Helping to secure this type of health care service appears to be a vital element for your local leaders and citizens to consider and support.

The interest level is high across the state for expanded pharmacy services for such a project as Telepharm in many communities Bancroft's size. Your willingness to explore the possibility of expanded services and medical support and prudently evaluate the positive impact to the community is very commendable.

Access to medical prescriptions and other ancillary services can be difficult in rural Iowa. This effort should seriously be considered to help cut down on special trips to larger communities for medical and pharmaceutical needs.

Please call upon IADG when we may be of further assistance.

Sincerely,



Bruce L. Hansen
Vice President Business Development

Hello

My name is Robert Deitering . I am an owner of a New Holland Farm implement business on the edge of town and have worked here for over 40 years. We employ 20 people and have seen instances over the last few years of the inconvenience of not having a pharmacy locally, especially it is hard on the young families with sick children. I have just a month ago had an employee who had to leave work to drive to Algona to get a prescription for his wife which takes productive time from us and also cost the employee lost wages. Not all of our employees doctor in town now but with a pharmacy I would think more of them may?

I would think and hope that our town with its better than average retail draw could support a pharmacy. Along with a car dealership, there is also a Case IH farm equipment dealer in town who probably employs the same number of people. Also we have a manufacturer in town who employs over 100, plus we have many businesses on main street.

I am strongly in favor of a telepharmacy in town. I was part of an earlier group that tried to recruit a pharmacist and found the cost of a pharmacist to be the biggest issue. The telepharmacy should work.

Sincerely,
Bob Deitering
Deitering Bros., Inc.
1109 360th Street
PO Box 47
Bancroft, Iowa 50517
Ph 515-885-2314
Fax 515-885-2611
www.deiteringbrothers.com

October 1, 2015

To: Members of the Iowa Pharmacy Board

It is exciting that Bancroft may once again have a pharmacy! I have lived in Bancroft for over 50 years and have worked at the local community bank for more than 30 years. I have also been on the Bancroft Chamber of Commerce board for several years and am a charter member of the Bancroft Area Rotary Club.

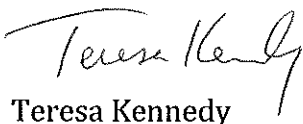
This community offers a large variety of businesses, including a nursing home/assisted living facility, two farm implement dealerships, Ford dealership, nice grocery store, etc. We are extremely proud that we do not have any empty buildings on our main street. These attributes are not typical in most rural towns.

As stated previously, I am very excited about the proposed pharmacy and would contribute funds toward the project. Residents would not have to go out of town for their prescriptions, which is positive in a variety of ways. For example, our older residents would not have to drive, which is especially nice during inclement weather. And our local merchants should also benefit because when a resident goes out of town for their prescriptions, they purchase other items as well.

Another benefit for us would be having a larger selection of over-the-counter pharmaceutical products than what our grocery store can offer. This would be a win for consumers in the price and selection department and it would be a win for the grocery store since they could use the shelf space for other items.

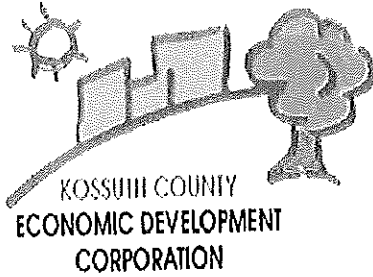
Other residents are also excited about a pharmacy returning to Bancroft. We take pride in the business community and adding a pharmacy would certainly be a great asset for us. Thank you for considering Bancroft in your expansion.

Sincerely,



Teresa Kennedy

Teresa Kennedy



106 South Dodge St., Suite 210
Algona, IA 50511
Ph: (515) 295-7979
Fax: (515) 295-8873
Email: kcedc@kossuthia.com
www.kossuth-edc.com

Maureen Elbert
Executive Director

Acres of Opportunity

October 1, 2015

RE: *Telepharm Pharmacy*

Ladies and Gentlemen:

Kossuth County Economic Development Corporation is supportive of a Telepharm Pharmacy in Bancroft. Telepharm Pharmacies are already operating successfully in over 100 stores in 12 states. Independent retail pharmacies are closing across the United States, leaving many patients without local access to these critical health services. A Telepharm Pharmacy is the solution for these rural communities.

Typically smaller communities cannot support a fully-staffed pharmacy, so by removing the on-site Pharmacist from the physical storefront, the operating costs are lowered substantially. It would operate as a traditional pharmacy except you would speak to the Pharmacist through a secure video call. The Telepharm Pharmacy will be operated by Certified Pharmacy Technicians and all prescriptions are verified for accuracy and safety.

This will greatly benefit the citizens of Bancroft and the surrounding area because it would prevent the need to travel long distances since prescriptions and over-the-counter medications would be available locally. It will also provide access to another healthcare provider, helping to fill gaps in care and improve the overall health in the community.

Kossuth County Economic Development Corporation would welcome a Telepharm Pharmacy in Bancroft since it will increase economic development by creating a storefront, quality paid jobs and keeping money locally.

Sincerely,

Maureen Elbert

Maureen Elbert
Executive Director

MFE:lk

FARMERS & TRADERS SAVINGS BANK

Sept. 30, 2015

Iowa Board of Pharmacy
400 SW 8th Street
Des Moines, IA 50309

Re: Tele-pharmacy

Dear Board Members:

I am writing a letter of support for the Iowa Board of Pharmacy to allow for an expansion in the number of tele-pharmacies to be allowed in Iowa. The reasons for my support include the following:

1. I am a resident of Bancroft, Iowa, located in the northern one-half of Kossuth County. I have been working for Farmers & Traders Savings Bank for the past 35 years, and currently hold the office of President/CEO. This bank serves Bancroft and the surrounding areas, and has no branches.

Bancroft serves as a trade center for the north one-half of Kossuth County, which Kossuth being a double sized county, means our trade area is the size of most other counties. The population of our trade area would be 4,000-5,000 people.

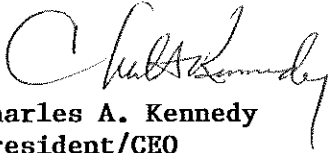
This community did have a full-time pharmacy until 2007. Since the closing of the Bancroft Pharmacy, and the retirement of Jack Van Norman in Swea City, our trade area has not had a pharmacy. An attempt to start-up a new pharmacy here in 2008 had the financial support of the community, but the model just doesn't work when a full-time pharmacist salary is included in the overhead. As a result, when people need a prescription filled quickly, they need to drive to Algona, Fairmont, MN, or Blue Earth, MN. This is a major inconvenience for the people in our trade area. Locating a tele-pharmacy here is a financially viable means of providing prescriptions, and is a perfect use of technology to add to the quality of life in more rural areas.

2. We have a full-time medical clinic, dentist, and chiropractor in Bancroft. We are a center for health care. We are missing the ability to provide prescription drugs. We have a vibrant main street area, along with a solid highway commercial area. All of our trade pull will help to insure the financial success of a tele-pharmacy.
3. We have a state recognized nursing home and 9 unit assisted living wing, doing business as Hawkeye Care Center (fka Heritage Home), along with 10 units of elderly, low & moderate income apartments owned by Bancroft Apartments, and 20 units for elderly, low income apartments operated by Pleasantview Manor HUD. Most of those tenants utilize the local medical clinic and would prefer to have prescriptions available without
(continued)

having to drive out of the community.

I strongly urge your favorable consideration of expanding the number of tele-pharmacies in Iowa. It seems that utilizing technology to facilitate the delivery of prescriptions is a very worthwhile use of technology, with very real benefits to the ultimate consumer. It is also a way to increase the quality of life in communities that are not the county seat, but have those desirable amenities that would help people to decide to locate there. Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles A. Kennedy".

Charles A. Kennedy
President/CEO

ck

CITY OF SWEA CITY

308 4th Ave. W.
Swea City, IA 50590
Phone: (515) 272-4606
Fax: (515) 272-4606

CITY CLERK

Alycia Sandvig

PUBLIC WORKS

Travis Stevens

Blake Stevens

CITY ATTORNEY

Scott Buchanan

MAYOR

Lawrence Slifka

CITY COUNCIL

Jill Bollinger

Emily Eisenmann

Debra Ellman

Chris Stevens

Cal Wolterman

October 1, 2015

To whom it may concern:

My family and I have lived in Swea City for ten years. I have been the City Clerk here in Swea City for two years. Previously I was employed at Pharmacists Mutual in Algona. When I was working in Algona filling a script wasn't an issue as there are a couple of pharmacies there. However, now that I am not working in a bigger city it would be very nice to have the option to be able to fill scripts at a pharmacy closer to home.

I also feel that having a pharmacy closer to home would be a wonderful asset to our community. Many of our community members would benefit from a pharmacy that is closer. The assisted living facility would also be able to use a pharmacy that is located more closely.

Our nearest options of for a pharmacy are approximately 30 minutes away. For many individuals this is an extra trip and would be much more convenient if a pharmacy were located closer to home. I feel that a new pharmacy business in the area would be very beneficial not only to myself but to many of the residents.

Alycia Sandvig



City Clerk
Swea City IA

Dick and Jan Deitering
PO Box 428
301 South Walnut
Bancroft, IA 50517

October, 5, 2015

Dear Members of the Iowa Pharmacy Board:

We are lifelong residents of Bancroft, IA who left this community for college, but then returned to run a business and raise our family in the rural Bancroft community setting. Presently, we are both retired, but, when working, Dick was an owner and manager, along with his brother, of Deitering Bros., Inc., one of two successful farm equipment dealerships in Bancroft, both of which are still in operation. Jan was a teacher, mother, and bookkeeper for DBI. During those years, Bancroft had a local pharmacy. If a worker was injured on the job, he/she could go to the local doctor for treatment and to the local pharmacist for any needed prescription(s). The same was true for families when they experienced injuries or common ailments. What a convenience for businesses, workers and busy families! What a convenience in inclement weather! Presently we can still go to the local clinic for treatment, but are unable to get prescriptions without going to Algona. Not ideal for workers, busy families, or senior citizens.

Bancroft is a progressive, full service community in northern Iowa, but it is lacking one essential service for its 1000+ population - a pharmacy to meet the needs of those many clients of our clinic as well as our assisted living and nursing home residents. Also, many small rural towns in our area would be better served for prescription needs as many of these communities are 30+ miles from a pharmacy. (Ex. - Swea City, Lakota, Ledyard)

Each service that is added to our community helps, not only area residents, but helps existing businesses to grow and thrive. We think that having the pharmacy would increase the number of people using the clinic and consequently local businesses. When clinic clients come to Bancroft, they will be more likely to use the grocery store, gas stations, restaurants, and other mainstreet businesses. This in turn increases tax dollars which then provides added tax dollars to our local school district and our community for needed infrastructure, recreation programs, EMS, etc. Improvements.

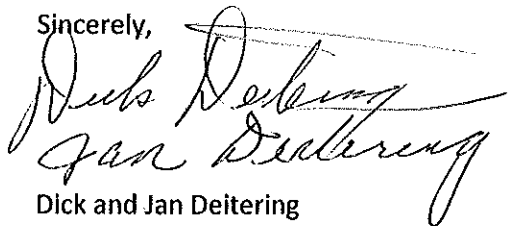
Discussion with local citizens has indicated to us that this pharmacy would be another service that they would like to have in Bancroft, and that they would use it if your board would approve the establishment of this telepharmacy. They like this idea!

Bancroft has seen a population growth in the last three years along with a significant growth in our business community. Young people are returning to begin these businesses. They are returning for the same reasons we returned - a great family and business community environment. As a board member of our local childcare center, Jan can attest to this as the childcare center has seen a tremendous growth in the infant and toddler numbers, to the point of needing to add a room to accommodate the increased numbers.

Rural communities are a great place to live and to raise a family, and Bancroft, with its strong service and retail business sector, is one of the best. In addition, the community has a golf course, bowling alley, tennis and basketball courts (inside and out), parks, health center and children's programs for recreation. If your time permitted, we invite you to visit and experience this for yourself.

Thanks for your time and your thoughtful consideration about this issue. We thank you in advance for helping our community and the state of Iowa to continue to grow and thrive!

Sincerely,



Dick and Jan Deitering

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on Board's agenda is three weeks prior to Board meeting.

IOWA BOARD OF PHARMACY
Petition for Waiver Variance
(check the appropriate box)

Case No. or State ID No.

Rec'd:

(FOR PHARMACY BOARD USE ONLY)

PLEASE PRINT OR TYPE ALL INFORMATION IN INK

A waiver excuses the petitioner from the requirements of a rule in its entirety or from a part of a rule; a variance does not. Instead, a variance is a modification to the requirements of a rule or a part of a rule. Example: A rule requires the fencing of certain property and further requires that the fence be at least 6 feet in height. A waiver of that rule would excuse the petitioner from the requirement for fencing the property. A variance would require the property be fenced but would allow the petitioner to maintain the current fencing configuration of 5 feet in height (perhaps the fence was constructed prior to the height requirement). When replacement of the current fence becomes necessary as a consequence of normal wear and tear, the variance would terminate and the petitioner would be required to comply with the 6-foot height requirement.

Note: Statutory requirements that have been repeated in administrative rules are not subject to consideration for a waiver or variance.

Is this petition an initial request or is it a request for renewal? Initial Request Request for Renewal
If a request for renewal, explain below why the renewal is necessary.

Petitioner Information (include licensee/registrant name and name of contact person, i.e. pharmacist in charge)

Name: TelePharm / Adam Chesler Phone No.: 319-535-0571
a.k.a. Sioux Rapids Pharmacy (include area code)
Address: 105 Iowa Ave Ste #231

City: Iowa City State: IA Zip Code: 52240

Petition Information

- Chapter Number and Title.
Chapter 9, AUTOMATED MEDICATION DISTRIBUTION SYSTEMS AND TELEPHARMACY SERVICES
- Rule Number(s) and Title(s).
9.3 (2) *Telepharmacy.*
- Describe in your own words the essence of each Rule Number(s) and Title(s) that pertains to this petition.
9.11 (2) By waiving rule 657—9.11(2), the Board of Pharmacy would allow a Certified Pharmacy Technician to perform these tasks in place of an AMDS. An independent telepharmacy platform will be used to manage and oversee all telepharmacy operations.
- Describe the specific nature and scope of your petition. In your description, include the anticipated time period (beginning and ending) for which the petition would apply. A waiver or variance may not be requested or granted on a permanent basis; the petition must identify an end date.

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on
Board's agenda is three weeks prior to Board meeting.

A new pharmacy will be opened with the community to give residents local access to a pharmacist. Please see the attached document with additional information as described in the "Telepharmacy Petition Requirements 5-2014" document.

5. Describe the relevant facts and reasons that, in your opinion, justify and provide "clear and convincing evidence" as to why this petition merits consideration for waiver or variance. In your description, explain why the rule(s) poses an undue hardship. If there is a public health, safety and welfare issue associated with this rule(s), or if this rule(s) addresses security or confidentiality issues, also explain how equal protection will be maintained if this petition were granted.

Telepharmacies in the state have operated safely and successfully since 2012. As the population in these small, rural areas is aging, the residents can benefit from having more direct access to pharmacy services, pharmacist oversight of OTC medication, and direct access to a pharmacist in the community. This is a critical service for the future of rural communities throughout the state.

6. Does anyone else (inside or outside state government) possess knowledge relevant to this petition?

Yes No Do not know

If yes, list their names, addresses and phone numbers below.

7. Would anyone (inside or outside state government) be adversely affected if this petition were granted?

Yes No Do not know

If yes, list their names, addresses and phone numbers below.

8. Do you know how the Board of Pharmacy has treated similar situations?

Yes No

If yes, describe below how similar situations were handled.

Waivers have been granted to the five (5) locations in the state. These locations have been operating safely and effectively for the past three years. This site will conform to the same operating policies and procedures and use the same technology and safety protocols as the existing telepharmacy locations.

9. Have you had any past interaction with the Board of Pharmacy that might impact or relate to this petition?

Yes No

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on
Board's agenda is three weeks prior to Board meeting.

I authorize any person with knowledge of the relevant or important facts relating to this petition to release any pertinent information to the Iowa Board of Pharmacy. I hereby attest to the accuracy and truthfulness of the information contained herein.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the end.

Petitioner's Signature

10/29/2015

Date

Sioux Rapids Telepharmacy Petition

October 29, 2015

Submitted by:

Adam Chelser, PharmD
Vice President of Operations
TelePharm
105 Iowa Ave Ste #231
Iowa City, IA 52240
(319) 535-0571
adam.chesler@telepharm.com

A. Establish the need for remote pharmacy site (telepharmacy practice)

1. Identify all pharmacies within a 25-mile radius of the proposed remote pharmacy site and distance of each pharmacy from the proposed remote pharmacy site

All pharmacies within a 25-mile radius of the proposed remote pharmacy site:

Walmart Pharmacy
1831 Lake Avenue
Storm Lake, IA 50588
18.6m

Walmart Pharmacy
500 11th St SW
Spencer, IA 51301
16.7m

White Drug
400 Grand Ave
Spencer, IA 51301
18.2m

Hy-Vee Pharmacy
800 N 2nd St Ste 2
Cherokee, IA 51012
31.8m

Hy-Vee Clinic Pharmacy
113 N 3rd St
Laurens, IA 50554
18.3m

Hy-Vee Pharmacy
1250 N Lake Avenue
Storm Lake, IA 50588
19.1m

Hy-Vee Bedels Pharmacy
409 W 5th St
Storm Lake, IA 50588
19.9m

Martin Health Services
1229 Lake Ave
Storm Lake, IA 50588
19m

Hy-Vee Pharmacy
819 Grand Ave
Spencer, IA 51301
18.5m

Cherokee Main St Pharmacy
206 Main St
Cherokee, IA 51012
30.3m

Walgreens
800 Lake Ave
Storm Lake, IA 50588
19.5m

Walgreens
800 Grand Ave
Spencer, IA 51301
18.8m

2. Distance to the pharmacy nearest to the proposed remote pharmacy site
18.2 miles

3. Distance between the managing pharmacy and the proposed remote pharmacy site
245 miles

4. Population of the community

795

5. Is the community in a critical access area

No

6. Identify prescribing practitioners currently practicing in the community, if any

Sioux Rapids Family Care

Susan Terrell, ARNP

7. Average number of prescriptions per day anticipated

20-40 prescriptions

8. If there was a pharmacy formerly located in the community, when did the pharmacy close and how long had the pharmacy been located in the community? Is there currently a pharmacy in the community with plans to close? If so, when is the anticipated closing?

The previous pharmacy closed more than 10 years ago

9. How and from where do residents of the community currently obtain their prescription medications?

Most residents travel to Storm Lake or Spencer to the Hy-Vee, Walmart, or Walgreens in those locations.

10. Will the remote pharmacy site be located in a medically underserved area (per federal definition)?

Yes

11. Will the remote pharmacy site be located near a rural health clinic (per 42 USC § 1395)?

No

12. Will the remote pharmacy site be located near a federally qualified health center?

No

13. Will the remote pharmacy site be located near a health care facility?

Yes, Sioux Rapids Family Care

14. Will the remote pharmacy site provide unique services that are not available from other area pharmacies?

No

B. Remote pharmacy site operational plan (submitted with initial license application)

1. Name and address of managing pharmacy and remote pharmacy site

Managing pharmacy

NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

Remote pharmacy site

Sioux Rapids Pharmacy
100 Front St
Sioux Rapids, IA 50585

2. Will automated dispensing equipment be used to dispense prescription drugs from the remote pharmacy site? If so, what type of automated system will be used and to what extent will dispensing be automated?

No automated dispensing equipment will be used to dispense prescription drugs from this remote pharmacy site.

3. Name and address of owner(s) of managing pharmacy and remote pharmacy site

Managing pharmacy

NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

Remote pharmacy site

TelePharm
105 Iowa Ave, Ste 231
Iowa City, Iowa, 52240

4. Name and address of pharmacist in charge of managing pharmacy and remote pharmacy site

Pamela Wong Wiltfang
NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

5. Name and address of certified pharmacy technician who will be the technician in charge of the remote pharmacy site

This will be determined after approval of this site, and will be submitted with the initial license application.

6. Identification of all remote pharmacy sites managed by the managing pharmacy

NuCara Pharmacy State Center, IA

NuCara Pharmacy Zearing, IA

7. Scale drawing of the remote pharmacy site that illustrates the following:

- a. Layout and location of all systems and system components**
- b. Location of patient counseling area**
- c. All access points to the electronic record-keeping system and drug inventory**

The location will be constructed using a standard pharmacy layout including a full community pharmacy prescription department, an OTC department for basic medical supplies, and a private clinical consultation room to be used for patient counseling and other private activities. It will also be handicapped accessible and secured with 24/7 motion and alarm systems. The details of this location will be determined after approval of this site, and will be submitted with the initial license application.



8. Description of the proposed telepharmacy practice including days and hours of operation and the remote pharmacy site's anticipated opening date

Please see Appendix A for the description of the telepharmacy practice. The anticipated opening date will be September, 2016.

9. Policies & Procedures for the telepharmacy service

Please see Appendix B for the Telepharmacy Policies & Procedures

10. Proposed staffing, identifying all individuals/positions involved with the telepharmacy service from the managing pharmacy and the remote pharmacy site, and including the responsibilities of each staff member

- a. **All technicians practicing at the remote pharmacy site must be nationally certified and registered with the Board**
- b. **All technicians practicing at the remote pharmacy site must have a minimum one year of Iowa pharmacy practice as a pharmacy technician**

The proposed staffing will be determined after approval of this site, and will be submitted with the initial license application. Our target technician will have 5+ years of experience. Prior to opening the technician will work in an established telepharmacy for training.

11. Plan for training personnel practicing at managing pharmacy and remote pharmacy site

The personnel which will oversee the remote pharmacy site from the managing pharmacy all have experience working with the remote pharmacy sites currently operating in Iowa.

The technicians hired to work at the remote pharmacy site will train in an operating telepharmacy during the month prior to starting at the remote pharmacy site. They will be trained according to best practices and standard operating procedures developed at these locations.

12. Identification and description of technology and communication systems to be used between the managing pharmacy and the remote pharmacy site

EnterpriseRx dispensing and Point-Of-Sale system will be used for general operations. The telepharmacy software for remote verification and patient counseling will be provided by TelePharm. EnterpriseRx has been chosen because of the 2-way interface between TelePharm and EnterpriseRx. The data between both systems will have an identical patient database that can be accessed in both sites in real-time. Technicians and Pharmacists both have unique username and passwords with specific roles. For example a pharmacist will have every patient's full profile readily available from any remote dispensing site which they are assigned to oversee.

- a. **Type of audio-visual link and communication will be utilized between the managing pharmacy and the remote pharmacy site**

The audio-visual link that will be utilized is a HIPAA-compliant peer-to-peer secure HD video conferencing protocol utilized in TelePharm's technology platform. This technology is in over 100 pharmacies in 8 different states with 100% success rate of pharmacies operating.

- b. **Will the link between the managing pharmacy and the remote pharmacy site be a constant, live, or real-time connection; if not, how and when will the link be activated; will the pharmacist be able to open a visual or audio link from the managing pharmacy without the assistance or interaction of the remote pharmacy site personnel**

There will be a live camera feed showing an overview of the pharmacy and the operations which will be readily available by the pharmacist at all times. They will be able to open this link from the managing pharmacy without the assistance or interaction of staff at the remote pharmacy site. In addition, a real-time connection will be made on demand between the pharmacist and patients, as well as technicians. This link can be initiated by pharmacists, technicians, or patients.

c. Will multiple camera views be available from the remote pharmacy site; who controls the camera views

Yes, multiple camera views will be available. The pharmacist at the managing pharmacy can control these camera views. Every part inside the pharmacy will be viewable from the cameras.

d. Will bar-code technology be utilized; if so, how and by whom

Yes, there will be two different bar-code technologies utilized at the telepharmacy:

1. Each prescription has a bar-code which needs to be scanned to open the prescription and begin the filling process
2. The NDC on the stock bottle will need to be scanned prior to filling the prescription
3. Each person who accesses TelePharm's system will have a unique user-id and password. Every action within the TelePharm system is tracked from opening a prescription record, capturing images and initiating counsel sessions.

13. Drug and record security and confidentiality at the remote pharmacy site

All employees will receive additional training pertaining to drug and record security and confidentiality. Additional areas of focus will include patient privacy, FWA, and cultural competency. Data will be transmitted through a HIPAA-compliant secure HTTPS connection to our data servers and stored using 256-bit AES encryption. Standard operating procedures will also be implemented to ensure drug and record security and confidentiality.

14. Record-keeping systems and location

a. Type of electronic/digital record-keeping system with the remote pharmacy site utilize for tracking and recording of dispensing activities and telepharmacy communications

b. Length of time that recorded data will be retained

Enterprise RX software will be utilized for record-keeping to track and record dispensing activities. The Enterprise RX system has a two-way integration into the telepharmacy system provided by TelePharm. Telepharmacy communications will be tracked and recorded through TelePharm software. Recorded data will be retained for a minimum of 10 years. All data and audit logs are readily available and our mirrored databases within both systems to the managing pharmacy.

15. Drug inventory and control

a. Will the remote pharmacy site maintain a stock supply of prescription drugs

Yes, the remote pharmacy site will maintain a limited stock supply of prescription drugs. The specific formulary for this location will be determined based on the need of the patients in the community.

b. Will the remote pharmacy site stock and dispense controlled substances; if so, where and how will controlled substance stock be maintained

Yes, the remote pharmacy site will maintain a limited supply of controlled substances. The specific formulary for this location will be determined based on the needs of the patients in the community. Controlled substance stock class 3-5 will be dispersed throughout the regular inventory, and will be checked bi-annually through inventory. Ordering trends will be monitored from the corporate office. CII drugs will only be ordered and stored on a requested basis by the local clinics/physician. CII drugs will be kept in a locked, secure location and a perpetual inventory will be kept and inspected on at least a monthly basis.

c. How will drugs be packaged for dispensing to the patient and who will package and label the patient's prescription

All prescriptions will be packaged and labeled by the certified pharmacy technicians working on-site at the remote pharmacy site. They will only be dispensed to the patient after they are verified by the pharmacist.

d. How often will noncontrolled prescription drugs be inventoried and by whom

The pharmacist will inventory the noncontrolled prescription drugs perpetually with software, and will conduct a manual inventory bi-annually.

e. How often will controlled substances be inventoried and by whom (suggest pharmacist in charge or pharmacist designated by pharmacist in charge)

The Pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge will ensure controlled substance inventory counts are recorded. Class 3-5 controlled substances will be monitored perpetually in the software, and reconciled bi-annually. CII inventory will be monitored perpetually in the software and will be reconciled at least once monthly.

f. If a perpetual inventory for controlled substances is utilized, who will reconcile the perpetual inventory to the physical inventory and how frequently (suggests monthly reconciliation by pharmacist in charge or pharmacist designated by pharmacist in charge)

Perpetual inventory will be utilized for controlled substances located at the remote site. Class 3-5 controlled substances will be reconciled biannually by the pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge. For Class 2 controlled substances, the pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge will reconcile the CII inventory at least monthly.

16. Scope of clinical pharmacy services to be provided at remote pharmacy site and who will provide those services

A comprehensive guide of services will be provided on-site, and tailored to the community's needs based on dialogue and relationships with the local prescribers and other healthcare providers. These services may include but are not limited to:

1. Medication Therapy Management
2. Comprehensive Medication review
3. Immunizations
4. Drug/Disease state education
5. Respiratory therapy
6. Durable medical equipment
7. Direct video link into clinic for clinical pharmacy services
8. Point-of-care testing with pharmacist on-site
9. Medication Synchronization

17. Continuous quality improvement plan and how it will be implemented and utilized

The pharmacists on duty for telepharmacy and the technician at the telepharmacy will be responsible for recording Continuous Quality Improvement (CQI) data to include metrics such as consultation and error rates. The staff will also utilize third party reporting for quality events. CQI events will be monitored from the corporate level to determine adjustments to best practices in order to prevent further occurrences.

18. System downtime plan and procedures

The telepharmacy cannot operate if the audio / visual link cannot be established and no prescriptions may be filled or dispensed. All dispensing activities will halt until the audio / visual link can be re-established. A cellular backup connection will be evaluated depending on the speed and reliability.

19. Processes for ensuring safety and security of patients and staff

Disaster preparedness plans will be included in the training for pharmacy staff. These plans include processes to ensure the safety and security of patients and staff. Additionally, cameras will be placed throughout the store.

20. Patient counseling process including plans to ensure security of patient information and privacy for discussions with patients

Managing Pharmacy will install telepharmacy audio / visual equipment from TelePharm. This equipment will provide an audio / visual link between the managing and remote location and also allow for HIPAA compliant counseling of patients. Patient counseling will be required and enforced with Telepharm software, compliant with Iowa consultation laws.

21. How toll-free telephone service will be provided and available to patients for direct contact with the managing pharmacy

Signs will be placed throughout the store alerting customers how to contact the managing pharmacy. Additionally, a pharmacist will always be available at the managing pharmacy through the TelePharm software to communicate with patients. Any calls coming into the remote pharmacy can easily be transferred directly to the pharmacist.

22. Schedule and process for periodic inspection of remote pharmacy site

a. How often will a pharmacist from the managing pharmacy inspect the remote pharmacy site

A pharmacist from the managing pharmacy will inspect the remote pharmacy site at least once per month.

b. What will be included in periodic inspection at the remote pharmacy site and who will conduct the inspection

Please see Appendix C for the monthly inspection checklist which will be conducted by a pharmacist from the managing pharmacy.

c. What will be the process to address discrepancies

Discrepancies will be followed with an immediate action plan to resolve and prevent further discrepancies. All reporting from each inspection will be reported to the corporate office for further evaluation.

23. Identification of information and data that will be provided in periodic reports to the Board

The telepharmacy site will provide the Board with periodic reports including, but not limited to, the following information:

- Documented information regarding specific pharmaceutical services provided to patients at the remote pharmacy site
- Number of prescriptions dispensed from the remote pharmacy site
- Number of prescriptions which came directly from the local clinic
- Identification of errors in dispensing from the remote pharmacy site by type of error and actions taken to resolve and prevent future errors by type
- Information regarding interactions with prescribers and community outreach efforts to patients and prescribers
- Successful counseling rate at the remote pharmacy site including comparison with counseling rate at the managing pharmacy
- Number of hours a pharmacist was physically present at the remote pharmacy site
- Number of hours the remote pharmacy site was open for business
- Plans for future onsite pharmacist staffing and criteria used to determine the need for onsite pharmacist staffing
- Patient surveys on satisfaction and care received

24. Specific identification of “technician in charge” – include qualifications

The “technician in charge” at the telepharmacy will be determined after approval of this site, and will be submitted with the initial license application.

25. Prohibit the OTC sale of controlled substances from remote pharmacy site when the pharmacist is not physically on-site

No OTC controlled substances will be sold from the remote pharmacy site when the pharmacist is not physically on-site.

26. Prohibit a pharmacist intern from practicing at the remote pharmacy site unless a qualified pharmacist is physically present at the remote site to supervise the pharmacist intern

Pharmacist interns will not be allowed to practice at the remote pharmacy site unless a qualified pharmacist is physically present at the remote site.

Appendix A: Description of the Telepharmacy Practice

This location will be implemented according to a proven template for telepharmacy operations that has been used in the current telepharmacy sites, specifically the Zearing and State Center locations. The pharmacist will be on site for face-to-face interactions with patients at least one day per month.

- The pharmacist will be physically located at the Managing Pharmacy and will be readily available to the technicians and patients at the Telepharmacy Site at all times. The pharmacist will continue to have ultimate authority over the dispensing process.
- The prescription department will be staffed by certified pharmacy technicians. The pharmacist-technician relationship will remain important as the pharmacist will utilize new technologies and the leadership of head technicians to maintain safety protocols for patients.
- All pharmacy technicians working at the telepharmacy site will be required to obtain and maintain current Certified Pharmacy Technician (CPhT) status through the Pharmacy Technician Certification Board (PTCB). They will also be required to have the following:
 - Minimum of two years experience working in an Iowa pharmacy
 - Must adhere to all other rules and regulations set forth by the Iowa Board of Pharmacy
- Technicians will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules
- Prescriptions will be filled according to all the standard operating procedures of a pharmacy. As the technician is filling the prescription, they will capture images of all steps which require pharmacist verification to provide to the verifying pharmacist. These images, along with any other documentation, will be sent to the pharmacist to verify the dispensing and clinical accuracy of the prescription. The prescription must be verified by the pharmacist before it is able to be dispensed to the patient.
- All of the information about the prescriptions filled at the Telepharmacy will be recorded and maintained in secure records with redundant backups for 10 years. This audit trail is readily available for any prescription processed at the Telepharmacy.
- A supervisor will travel to the Telepharmacy site once per week for the first month of operation to ensure policies and procedures are being followed.
- A pharmacist will travel to the Telepharmacy at least one time per month to perform a detailed inspection at the site and have face-to-face time with patients. While the pharmacist is on site, (s)he will verify all policies and procedures are being properly followed. When a pharmacist is not available on site, all verification and counseling will be provided by an Iowa licensed pharmacist.

- Medication counseling and responding to patient questions will be completed through a secure video connection in a private area when the medications are dispensed to the patient. Pharmacists will be readily available for consultation with patients, prescribers, and other care providers through a secure video connection. All patients will be required to review prescription information that includes side effects and warnings prior to the counseling session. All new prescriptions will require pharmacist counseling.

An Iowa licensed pharmacist at the managing pharmacy will remotely verify prescriptions and counsel patients. The pharmacist will be on site to visit each telepharmacy at least monthly, and pharmacist presence will increase as patient growth allows in order to maximize the in-person pharmacist-patient relationship.

Experienced Certified Pharmacy Technicians (CPhT) will be hired to work at the telepharmacy. There will be at least 1 technician staffing the location daily, with an additional technician on call as needed. Every effort will be made to hire technicians who reside in or around the community for ease of commute and connection to the community.

The telepharmacy will initially have approximate hours from 9:00am - 5:00pm Monday through Friday with variations depending on specific community need. Evening hours as well as Saturday hours will be considered.

Appendix B: Telepharmacy Policies & Procedures

POLICIES

1. Managing Pharmacy will operate and maintain a local telepharmacy that will provide access to critical pharmacy services to the community.
2. Managing Pharmacy will ensure that all Iowa Board of Pharmacy telepharmacy rules (Chapter 9) are followed while operating as a telepharmacy, with the exception of the waiver of the AMDS requirement
3. Managing Pharmacy will ensure that available technology is utilized in the operation of the telepharmacy location to protect the health and safety of all patients.
4. All Managing Pharmacy Operational Policies and Procedures will apply to the telepharmacy unless contradicted by the specific telepharmacy procedures as described in this section.
5. All pharmacy technicians working at the telepharmacy sites will be required to obtain and maintain current Certified Pharmacy Technician (CPhT) status through the Pharmacy Technician Certification Board (PTCB). They will also be required to have the following:
 - a. Minimum of one year experience working in an Iowa pharmacy
 - b. Training in a telepharmacy setting before beginning at the remote pharmacy site
 - c. Must adhere to all other rules and regulations set forth by the Iowa Board of Pharmacy
6. Technicians will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules
7. Technicians will be responsible for recording Continuous Quality Improvement data to include metrics such as consultation and error rates.

PROCEDURES

1. Pharmacy Overview
 - a. Managing Pharmacy will maintain a licensed community pharmacy.
 - b. The Pharmacist in Charge (PIC) in the community will be responsible for the oversight and operation of the telepharmacy. The PIC will be a pharmacist from the Managing Pharmacy location that has been previously trained on telepharmacy policies and procedures.
2. Personnel Responsibilities
 - a. The PIC will be responsible for the oversight of the telepharmacy operation. The PIC will develop and maintain the Operational Policies and Procedures of the telepharmacy and is responsible for training the staff of the telepharmacy and the managing pharmacists in the legal and safe operation of the telepharmacy.

- b. While operating as a telepharmacy, the pharmacy will be staffed with a Certified Pharmacy Technician at all times. The CPhT will be responsible for all technical functions performed at the telepharmacy. The technician will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules.
 - c. The current pharmacist on duty for telepharmacy will be responsible for ensuring the accuracy and validity of all prescriptions dispensed by the telepharmacy. The pharmacist will also be responsible for providing counseling to all patients at the telepharmacy for new prescriptions and as requested for refill prescriptions, OTC medications, or other health information questions.
 - d. The pharmacists on duty for telepharmacy and the technician at the telepharmacy will be responsible for recording Continuous Quality Improvement data to include metrics such as consultation and error rates.
 - e. The PIC of the telepharmacy will ensure monthly controlled substance inventory counts are recorded.
3. Technology Safeguards
- a. Managing Pharmacy will install telepharmacy audio / visual equipment from TelePharm. This equipment will provide an audio / visual link between the managing and remote location and also allow for HIPAA compliant counseling of patients. The telepharmacy cannot operate as a telepharmacy if the audio / visual link cannot be established and no prescriptions may be filled or dispensed.
 - b. The technician at the telepharmacy site will utilize barcode technology and the Tech Check module in the dispensing software to verify the products of all prescriptions filled.
 - c. The telepharmacist on duty at will use the audio / visual link to check the hard copy of new prescriptions, the prescription label, and the contents of the package. The pharmacist will be responsible for the accuracy and validity of the finished prescription product and marking it as complete in the TelePharm software.

Appendix C: Pharmacist Monthly Inspection Checklist

Telepharmacy Site _____ DayTime of Visit _____

Inspected By _____

| | Checklist Item | Y/N | Comments |
|----|---|-----|----------|
| 1 | Is a notice conspicuously displayed on the registered pharmacy premises detailing the name and registration number of the responsible pharmacist and the fact that a pharmacist is accessible for consultation at any time? | | |
| 2 | Are pharmacy technicians following proper Consultation procedure? | | |
| 3 | Audit 20 filled prescriptions, are they accurate? | | |
| 4 | Audit 10 hard copies, is proper documentation being observed | | |
| 5 | Observe technicians filling a prescription, are proper SOP being followed? | | |
| 6 | Are customers greeted immediately upon entry? | | |
| 7 | Are proper inventory control SOP being followed? | | |
| 8 | Check 10 shelf bottles on shelf, are any of them expired? | | |
| 9 | Are all staff in clean and proper uniforms and nametags are prominently visible? | | |
| 10 | Is the CII cabinet locked and the key stored appropriately? | | |
| 11 | Are patient required references in clear view? | | |
| 12 | Is the filling area clear and uncluttered? | | |
| 13 | Is the store area clear and uncluttered? | | |
| 14 | Walk the perimeter, are there any concerns? | | |
| 15 | Are the bathrooms clean and tended to? | | |

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on Board's agenda is three weeks prior to Board meeting.

IOWA BOARD OF PHARMACY
Petition for Waiver Variance
(check the appropriate box)

Case No. or State ID No.

Rec'd:

(FOR PHARMACY BOARD USE ONLY)

PLEASE PRINT OR TYPE ALL INFORMATION IN INK

A waiver excuses the petitioner from the requirements of a rule in its entirety or from a part of a rule; a variance does not. Instead, a variance is a modification to the requirements of a rule or a part of a rule. Example: A rule requires the fencing of certain property and further requires that the fence be at least 6 feet in height. A waiver of that rule would excuse the petitioner from the requirement for fencing the property. A variance would require the property be fenced but would allow the petitioner to maintain the current fencing configuration of 5 feet in height (perhaps the fence was constructed prior to the height requirement). When replacement of the current fence becomes necessary as a consequence of normal wear and tear, the variance would terminate and the petitioner would be required to comply with the 6-foot height requirement.

Note: Statutory requirements that have been repeated in administrative rules are not subject to consideration for a waiver or variance.

Is this petition an initial request or is it a request for renewal? Initial Request Request for Renewal
If a request for renewal, explain below why the renewal is necessary.

Petitioner Information (include licensee/registrant name and name of contact person, i.e. pharmacist in charge)

Name: TelePharm / Adam Chesler
a.k.a. Wayland Pharmacy
Address: 105 Iowa Ave Ste #231

Phone No.: 319-535-0571
(include area code)

City: Iowa City

State: IA

Zip Code: 52240

Petition Information

1. Chapter Number and Title.

Chapter 9, AUTOMATED MEDICATION DISTRIBUTION SYSTEMS AND TELEPHARMACY SERVICES

2. Rule Number(s) and Title(s).

9.3 (2) *Telepharmacy.*

9.5 (2)c *Need for remote dispensing site.*

3. Describe in your own words the essence of each Rule Number(s) and Title(s) that pertains to this petition.

9.11 (2) By waiving rule 657—9.11(2), the Board of Pharmacy would allow a Certified Pharmacy Technician to perform these tasks in place of an AMDS. An independent telepharmacy platform will be used to manage and oversee all telepharmacy operations.

9.5 (2)c By waiving rule 657—9.5(2)c, the Board of Pharmacy would allow a telepharmacy to be located within 15 miles of another pharmacy. This will allow residents in these communities to have local access to a pharmacist.

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on Board's agenda is three weeks prior to Board meeting.

4. Describe the specific nature and scope of your petition. In your description, include the anticipated time period (beginning and ending) for which the petition would apply. A waiver or variance may not be requested or granted on a permanent basis; the petition must identify an end date.

A new pharmacy will be opened with the community to give residents local access to a pharmacist. Please see the attached document with additional information as described in the "Telepharmacy Petition Requirements 5-2014" document.

5. Describe the relevant facts and reasons that, in your opinion, justify and provide "clear and convincing evidence" as to why this petition merits consideration for waiver or variance. In your description, explain why the rule(s) poses an undue hardship. If there is a public health, safety and welfare issue associated with this rule(s), or if this rule(s) addresses security or confidentiality issues, also explain how equal protection will be maintained if this petition were granted.

Telepharmacies in the state have operated safely and successfully since 2012. As the population in these small, rural areas is aging, the residents can benefit from having more direct access to pharmacy services, pharmacist oversight of OTC medication, and direct access to a pharmacist in the community. This is a critical service for the future of rural communities throughout the state.

6. Does anyone else (inside or outside state government) possess knowledge relevant to this petition?

Yes No Do not know

If yes, list their names, addresses and phone numbers below.

Robert Meyer, Economic Development Director - (319) 256-5000
Brad Roth, Mayor, 319-256-3276
Russell Yoder, Economic Development - (319) 256-5000

7. Would anyone (inside or outside state government) be adversely affected if this petition were granted?

Yes No Do not know

If yes, list their names, addresses and phone numbers below.

8. Do you know how the Board of Pharmacy has treated similar situations?

Yes No

If yes, describe below how similar situations were handled.

Waivers have been granted to the five (5) locations in the state. These locations have been operating safely and effectively for the past three years. This site will conform to the same operating policies and procedures and use the same technology and safety protocols as the existing telepharmacy locations.

9. Have you had any past interaction with the Board of Pharmacy that might impact or relate to this petition?

Yes No

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on
Board's agenda is three weeks prior to Board meeting.

If yes, describe below the issue involved and the outcome.

A request was submitted for consideration at the Board meeting on August 31, 2015 and discussion was
tabled until the November meeting.

I authorize any person with knowledge of the relevant or important facts relating to this petition to release any
pertinent information to the Iowa Board of Pharmacy. I hereby attest to the accuracy and truthfulness of the
information contained herein.



Petitioner's Signature

10/29/2015

Date

Wayland Telepharmacy Petition

October 29, 2015

Submitted by:

Adam Chelser, PharmD
Vice President of Operations
TelePharm
105 Iowa Ave Ste #231
Iowa City, IA 52240
(319) 535-0571
adam.chesler@telepharm.com

A. Establish the need for remote pharmacy site (telepharmacy practice)

1. Identify all pharmacies within a 25-mile radius of the proposed remote pharmacy site and distance of each pharmacy from the proposed remote pharmacy site

All pharmacies within a 25-mile radius of the proposed remote pharmacy site:

Walmart Pharmacy
1045 N Grand Ave
Mt Pleasant, IA 52641
17.8m

Hy-Vee Pharmacy
1700 E Washington St
Mt Pleasant, IA 52641
19.1m

Medicap Pharmacy
300 W Washington St
Mt Pleasant, IA 52641
17.6m

Capstone Pharmacy
210 N Jefferson St
Mt Pleasant, IA 52641
17.8m

Walmart Pharmacy
2485 IA-92
Washington, IA 52353
12.2m

Hy-Vee Pharmacy
528 IA-1
Washington, IA 52353
11.9m

Beans Pharmacy
222 S Iowa Ave.
Washington, IA 52353
11m

Walmart Pharmacy
2485 Highway 92
Washington, IA 52353
12.2m

Walmart Pharmacy
2701 W Burlington Ave
Fairfield, IA 52556
27.2m

Reliant Long Term Care Pharmacy
1010 W Madison St Ste B
Washington, IA 52353
11.6m

Pharmacy on 8th
221 8th Ave
Wellman, IA 52356
29.8m

NuCara Pharmacy
200 South Main St
Fairfield, IA 52556
25.8m

River Crossing Pharmacy
3056 River Crossing Court Suite A
Riverside, IA 52327
28.8m

Hy-Vee Pharmacy
1700 E Washington St

Mt Pleasant, IA 52641

Hy-Vee Pharmacy
1300 W Burlington Ave
Fairfield, IA 52556
26.5m

Hy-Vee Clinic Pharmacy
501 S White Suite #3
Mt Pleasant, IA 52641
17.7m

Hy-Vee Clinic Pharmacy
111 Walnut Street
Columbus Junction, IA 52738
25.8m

Hy-Vee Clinic Pharmacy
312 North 2nd Street
Wapello, IA 52653
29.9m

Hy-Vee Drugstore
129 S Jefferson St
Mt Pleasant, IA 52641
17.7m

2. Distance to the pharmacy nearest to the proposed remote pharmacy site

11.0 miles

3. Distance between the managing pharmacy and the proposed remote pharmacy site

44.2 miles

4. Population of the community

969

5. Is the community in a critical access area

No

6. Identify prescribing practitioners currently practicing in the community, if any

Henry County Health Center

Jessie Anderson, ARNP

7. Average number of prescriptions per day anticipated

20-40 prescriptions

8. If there was a pharmacy formerly located in the community, when did the pharmacy close and how long had the pharmacy been located in the community? Is there currently a pharmacy in the community with plans to close? If so, when is the anticipated closing?

The previous pharmacy closed more than 20 years ago

9. How and from where do residents of the community currently obtain their prescription medications?

Most residents travel to Washington or Mt Pleasant to Walmart and Hy-Vee, some also go to Beans and the new Capstone pharmacy

10. Will the remote pharmacy site be located in a medically underserved area (per federal definition)?

No

11. Will the remote pharmacy site be located near a rural health clinic (per 42 USC § 1395)?

No

12. Will the remote pharmacy site be located near a federally qualified health center?

No

13. Will the remote pharmacy site be located near a health care facility?

Yes, Henry County Health Center

14. Will the remote pharmacy site provide unique services that are not available from other area pharmacies?

No

B. Remote pharmacy site operational plan (submitted with initial license application)

1. Name and address of managing pharmacy and remote pharmacy site

Managing pharmacy

NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

Remote pharmacy site

Wayland Pharmacy
227 W Main St
Wayland, IA 52654

2. Will automated dispensing equipment be used to dispense prescription drugs from the remote pharmacy site? If so, what type of automated system will be used and to what extent will dispensing be automated?

No automated dispensing equipment will be used to dispense prescription drugs from this remote pharmacy site.

3. Name and address of owner(s) of managing pharmacy and remote pharmacy site

Managing pharmacy

NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

Remote pharmacy site

TelePharm
105 Iowa Ave, Ste 231
Iowa City, Iowa, 52240

4. Name and address of pharmacist in charge of managing pharmacy and remote pharmacy site

Pamela Wong Wiltfang
NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

5. Name and address of certified pharmacy technician who will be the technician in charge of the remote pharmacy site

This will be determined after approval of this site, and will be submitted with the initial license application.

6. Identification of all remote pharmacy sites managed by the managing pharmacy

NuCara Pharmacy State Center, IA
NuCara Pharmacy Zearing, IA

7. Scale drawing of the remote pharmacy site that illustrates the following:

- a. Layout and location of all systems and system components
- b. Location of patient counseling area

c. All access points to the electronic record-keeping system and drug inventory

The location will be constructed using a standard pharmacy layout including a full community pharmacy prescription department, an OTC department for basic medical supplies, and a private clinical consultation room to be used for patient counseling and other private activities. It will also be handicapped accessible and secured with 24/7 motion and alarm systems. The details of this location will be determined after approval of this site, and will be submitted with the initial license application.



8. Description of the proposed telepharmacy practice including days and hours of operation and the remote pharmacy site's anticipated opening date

Please see Appendix A for the description of the telepharmacy practice. The anticipated opening date will be May, 2016.

9. Policies & Procedures for the telepharmacy service

Please see Appendix B for the Telepharmacy Policies & Procedures

10. Proposed staffing, identifying all individuals/positions involved with the telepharmacy service from the managing pharmacy and the remote pharmacy site, and including the responsibilities of each staff member

- a. All technicians practicing at the remote pharmacy site must be nationally certified and registered with the Board
- b. All technicians practicing at the remote pharmacy site must have a minimum one year of Iowa pharmacy practice as a pharmacy technician

The proposed staffing will be determined after approval of this site, and will be submitted with the initial license application. Our target technician will have 5+ years of experience. Prior to opening the technician will work in an established telepharmacy for training.

11. Plan for training personnel practicing at managing pharmacy and remote pharmacy site

The personnel which will oversee the remote pharmacy site from the managing pharmacy all have experience working with the remote pharmacy sites currently operating in Iowa.

The technicians hired to work at the remote pharmacy site will train in an operating telepharmacy during the month prior to starting at the remote pharmacy site. They will be trained according to best practices and standard operating procedures developed at these locations.

12. Identification and description of technology and communication systems to be used between the managing pharmacy and the remote pharmacy site

EnterpriseRx dispensing and Point-Of-Sale system will be used for general operations. The telepharmacy software for remote verification and patient counseling will be provided by TelePharm. EnterpriseRx has been chosen because of the 2-way interface between TelePharm and EnterpriseRx. The data between both systems will have an identical patient database that can be accessed in both sites in real-time. Technicians and Pharmacists both have unique username and passwords with specific roles. For example a pharmacist will have every patient's full profile readily available from any remote dispensing site which they are assigned to oversee.

a. Type of audio-visual link and communication will be utilized between the managing pharmacy and the remote pharmacy site

The audio-visual link that will be utilized is a HIPAA-compliant peer-to-peer secure HD video conferencing protocol utilized in TelePharm's technology platform. This technology is in over 100 pharmacies in 8 different states with 100% success rate of pharmacies operating.

b. Will the link between the managing pharmacy and the remote pharmacy site be a constant, live, or real-time connection; if not, how and when will the link be activated; will the pharmacist be able to open a visual or audio link from the managing pharmacy without the assistance or interaction of the remote pharmacy site personnel

There will be a live camera feed showing an overview of the pharmacy and the operations which will be readily available by the pharmacist at all times. They will be able to open this link from the managing pharmacy without the assistance or interaction of staff at the remote pharmacy site. In addition, a real-time connection will be made on demand between the pharmacist and patients, as well as technicians. This link can be initiated by pharmacists, technicians, or patients.

c. Will multiple camera views be available from the remote pharmacy site; who controls the camera views

Yes, multiple camera views will be available. The pharmacist at the managing pharmacy can control these camera views. Every part inside the pharmacy will be viewable from the cameras.

d. Will bar-code technology be utilized; if so, how and by whom

Yes, there will be two different bar-code technologies utilized at the telepharmacy:

1. Each prescription has a bar-code which needs to be scanned to open the prescription and begin the filling process
2. The NDC on the stock bottle will need to be scanned prior to filling the prescription
3. Each person who accesses TelePharm's system will have a unique user-id and password. Every action within the TelePharm system is tracked from opening a prescription record, capturing images and initiating counsel sessions.

13. Drug and record security and confidentiality at the remote pharmacy site

All employees will receive additional training pertaining to drug and record security and confidentiality. Additional areas of focus will include patient privacy, FWA, and cultural competency. Data will be transmitted through a HIPAA-compliant secure HTTPS connection to our data servers and stored using 256-bit AES encryption. Standard operating procedures will also be implemented to ensure drug and record security and confidentiality.

14. Record-keeping systems and location

a. Type of electronic/digital record-keeping system with the remote pharmacy site utilize for tracking and recording of dispensing activities and telepharmacy communications

b. Length of time that recorded data will be retained

Enterprise RX software will be utilized for record-keeping to track and record dispensing activities. The Enterprise RX system has a two-way integration into the telepharmacy system provided by TelePharm. Telepharmacy communications will be tracked and recorded through TelePharm software. Recorded data will be retained for a minimum of 10 years. All data and audit logs are readily available and our mirrored databases within both systems to the managing pharmacy.

15. Drug inventory and control

a. Will the remote pharmacy site maintain a stock supply of prescription drugs

Yes, the remote pharmacy site will maintain a limited stock supply of prescription drugs. The specific formulary for this location will be determined based on the need of the patients in the community.

b. Will the remote pharmacy site stock and dispense controlled substances; if so, where and how will controlled substance stock be maintained

Yes, the remote pharmacy site will maintain a limited supply of controlled substances. The specific formulary for this location will be determined based on the needs of the patients in the community. Controlled substance stock class 3-5 will be dispersed throughout the regular inventory, and will be checked bi-annually through inventory. Ordering trends will be monitored from the corporate office. CII drugs will only be ordered and stored on a requested basis by the local clinics/physician. CII drugs will be kept in a locked, secure location and a perpetual inventory will be kept and inspected on at least a monthly basis.

c. How will drugs be packaged for dispensing to the patient and who will package and label the patient's prescription

All prescriptions will be packaged and labeled by the certified pharmacy technicians working on-site at the remote pharmacy site. They will only be dispensed to the patient after they are verified by the pharmacist.

d. How often will noncontrolled prescription drugs be inventoried and by whom

The pharmacist will inventory the noncontrolled prescription drugs perpetually with software, and will conduct a manual inventory bi-annually.

e. How often will controlled substances be inventoried and by whom (suggest pharmacist in charge or pharmacist designated by pharmacist in charge)

The Pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge will ensure controlled substance inventory counts are recorded. Class 3-5 controlled substances will be monitored perpetually in the software, and reconciled bi-annually. CII inventory will be monitored perpetually in the software and will be reconciled at least once monthly.

f. If a perpetual inventory for controlled substances is utilized, who will reconcile the perpetual inventory to the physical inventory and how frequently (suggests monthly reconciliation by pharmacist in charge or pharmacist designated by pharmacist in charge)

Perpetual inventory will be utilized for controlled substances located at the remote site. Class 3-5 controlled substances will be reconciled biannually by the pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge. For Class 2 controlled substances, the pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge will reconcile the CII inventory at least monthly.

16. Scope of clinical pharmacy services to be provided at remote pharmacy site and who will provide those services

A comprehensive guide of services will be provided on-site, and tailored to the community's needs based on dialogue and relationships with the local prescribers and other healthcare providers. These services may include but are not limited to:

1. Medication Therapy Management

2. Comprehensive Medication review
3. Immunizations
4. Drug/Disease state education
5. Respiratory therapy
6. Durable medical equipment
7. Direct video link into clinic for clinical pharmacy services
8. Point-of-care testing with pharmacist on-site
9. Medication Synchronization

17. Continuous quality improvement plan and how it will be implemented and utilized

The pharmacists on duty for telepharmacy and the technician at the telepharmacy will be responsible for recording Continuous Quality Improvement (CQI) data to include metrics such as consultation and error rates. The staff will also utilize third party reporting for quality events. CQI events will be monitored from the corporate level to determine adjustments to best practices in order to prevent further occurrences.

18. System downtime plan and procedures

The telepharmacy cannot operate if the audio / visual link cannot be established and no prescriptions may be filled or dispensed. All dispensing activities will halt until the audio / visual link can be re-established. A cellular backup connection will be evaluated depending on the speed and reliability.

19. Processes for ensuring safety and security of patients and staff

Disaster preparedness plans will be included in the training for pharmacy staff. These plans include processes to ensure the safety and security of patients and staff. Additionally, cameras will be placed throughout the store.

20. Patient counseling process including plans to ensure security of patient information and privacy for discussions with patients

Managing Pharmacy will install telepharmacy audio / visual equipment from TelePharm. This equipment will provide an audio / visual link between the managing and remote location and also allow for HIPAA compliant counseling of patients. Patient counseling will be required and enforced with Telepharm software, compliant with Iowa consultation laws.

21. How toll-free telephone service will be provided and available to patients for direct contact with the managing pharmacy

Signs will be placed throughout the store alerting customers how to contact the managing pharmacy. Additionally, a pharmacist will always be available at the managing pharmacy through the TelePharm software to communicate with patients. Any calls coming into the remote pharmacy can easily be transferred directly to the pharmacist.

22. Schedule and process for periodic inspection of remote pharmacy site

a. How often will a pharmacist from the managing pharmacy inspect the remote pharmacy site

A pharmacist from the managing pharmacy will inspect the remote pharmacy site at least once per month.

b. What will be included in periodic inspection at the remote pharmacy site and who will conduct the inspection

Please see Appendix C for the monthly inspection checklist which will be conducted by a pharmacist from the managing pharmacy.

c. What will be the process to address discrepancies

Discrepancies will be followed with an immediate action plan to resolve and prevent further discrepancies. All reporting from each inspection will be reported to the corporate office for further evaluation.

23. Identification of information and data that will be provided in periodic reports to the Board

The telepharmacy site will provide the Board with periodic reports including, but not limited to, the following information:

- Documented information regarding specific pharmaceutical services provided to patients at the remote pharmacy site
- Number of prescriptions dispensed from the remote pharmacy site
- Number of prescriptions which came directly from the local clinic
- Identification of errors in dispensing from the remote pharmacy site by type of error and actions taken to resolve and prevent future errors by type
- Information regarding interactions with prescribers and community outreach efforts to patients and prescribers
- Successful counseling rate at the remote pharmacy site including comparison with counseling rate at the managing pharmacy
- Number of hours a pharmacist was physically present at the remote pharmacy site
- Number of hours the remote pharmacy site was open for business
- Plans for future onsite pharmacist staffing and criteria used to determine the need for onsite pharmacist staffing
- Patient surveys on satisfaction and care received

24. Specific identification of “technician in charge” – include qualifications

The “technician in charge” at the telepharmacy will be determined after approval of this site, and will be submitted with the initial license application.

25. Prohibit the OTC sale of controlled substances from remote pharmacy site when the pharmacist is not physically on-site

No OTC controlled substances will be sold from the remote pharmacy site when the pharmacist is not physically on-site.

26. Prohibit a pharmacist intern from practicing at the remote pharmacy site unless a qualified pharmacist is physically present at the remote site to supervise the pharmacist intern

Pharmacist interns will not be allowed to practice at the remote pharmacy site unless a qualified pharmacist is physically present at the remote site.

Appendix A: Description of the Telepharmacy Practice

This location will be implemented according to a proven template for telepharmacy operations that has been used in the current telepharmacy sites, specifically the Zearing and State Center locations. The pharmacist will be on site for face-to-face interactions with patients at least one day per month.

- The pharmacist will be physically located at the Managing Pharmacy and will be readily available to the technicians and patients at the Telepharmacy Site at all times. The pharmacist will continue to have ultimate authority over the dispensing process.
- The prescription department will be staffed by certified pharmacy technicians. The pharmacist-technician relationship will remain important as the pharmacist will utilize new technologies and the leadership of head technicians to maintain safety protocols for patients.
- All pharmacy technicians working at the telepharmacy site will be required to obtain and maintain current Certified Pharmacy Technician (CPhT) status through the Pharmacy Technician Certification Board (PTCB). They will also be required to have the following:
 - Minimum of two years experience working in an Iowa pharmacy
 - Must adhere to all other rules and regulations set forth by the Iowa Board of Pharmacy
- Technicians will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules
- Prescriptions will be filled according to all the standard operating procedures of a pharmacy. As the technician is filling the prescription, they will capture images of all steps which require pharmacist verification to provide to the verifying pharmacist. These images, along with any other documentation, will be sent to the pharmacist to verify the dispensing and clinical accuracy of the prescription. The prescription must be verified by the pharmacist before it is able to be dispensed to the patient.
- All of the information about the prescriptions filled at the Telepharmacy will be recorded and maintained in secure records with redundant backups for 10 years. This audit trail is readily available for any prescription processed at the Telepharmacy.
- A supervisor will travel to the Telepharmacy site once per week for the first month of operation to ensure policies and procedures are being followed.
- A pharmacist will travel to the Telepharmacy at least one time per month to perform a detailed inspection at the site and have face-to-face time with patients. While the pharmacist is on site, (s)he will verify all policies and procedures are being properly followed. When a pharmacist is not available on site, all verification and counseling will be provided by an Iowa licensed pharmacist.

- Medication counseling and responding to patient questions will be completed through a secure video connection in a private area when the medications are dispensed to the patient. Pharmacists will be readily available for consultation with patients, prescribers, and other care providers through a secure video connection. All patients will be required to review prescription information that includes side effects and warnings prior to the counseling session. All new prescriptions will require pharmacist counseling.

An Iowa licensed pharmacist at the managing pharmacy will remotely verify prescriptions and counsel patients. The pharmacist will be on site to visit each telepharmacy at least monthly, and pharmacist presence will increase as patient growth allows in order to maximize the in-person pharmacist-patient relationship.

Experienced Certified Pharmacy Technicians (CPhT) will be hired to work at the telepharmacy. There will be at least 1 technician staffing the location daily, with an additional technician on call as needed. Every effort will be made to hire technicians who reside in or around the community for ease of commute and connection to the community.

The telepharmacy will initially have approximate hours from 9:00am - 5:00pm Monday through Friday with variations depending on specific community need. Evening hours as well as Saturday hours will be considered.

Appendix B: Telepharmacy Policies & Procedures

POLICIES

1. Managing Pharmacy will operate and maintain a local telepharmacy that will provide access to critical pharmacy services to the community.
2. Managing Pharmacy will ensure that all Iowa Board of Pharmacy telepharmacy rules (Chapter 9) are followed while operating as a telepharmacy, with the exception of the waiver of the AMDS requirement
3. Managing Pharmacy will ensure that available technology is utilized in the operation of the telepharmacy location to protect the health and safety of all patients.
4. All Managing Pharmacy Operational Policies and Procedures will apply to the telepharmacy unless contradicted by the specific telepharmacy procedures as described in this section.
5. All pharmacy technicians working at the telepharmacy sites will be required to obtain and maintain current Certified Pharmacy Technician (CPhT) status through the Pharmacy Technician Certification Board (PTCB). They will also be required to have the following:
 - a. Minimum of one year experience working in an Iowa pharmacy
 - b. Training in a telepharmacy setting before beginning at the remote pharmacy site
 - c. Must adhere to all other rules and regulations set forth by the Iowa Board of Pharmacy
6. Technicians will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules
7. Technicians will be responsible for recording Continuous Quality Improvement data to include metrics such as consultation and error rates.

PROCEDURES

1. Pharmacy Overview
 - a. Managing Pharmacy will maintain a licensed community pharmacy.
 - b. The Pharmacist in Charge (PIC) in the community will be responsible for the oversight and operation of the telepharmacy. The PIC will be a pharmacist from the Managing Pharmacy location that has been previously trained on telepharmacy policies and procedures.
2. Personnel Responsibilities
 - a. The PIC will be responsible for the oversight of the telepharmacy operation. The PIC will develop and maintain the Operational Policies and Procedures of the telepharmacy and is responsible for training the staff of the telepharmacy and the managing pharmacists in the legal and safe operation of the telepharmacy.

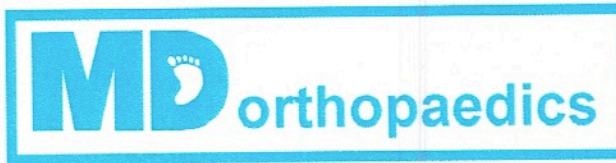
- b. While operating as a telepharmacy, the pharmacy will be staffed with a Certified Pharmacy Technician at all times. The CPhT will be responsible for all technical functions performed at the telepharmacy. The technician will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules.
 - c. The current pharmacist on duty for telepharmacy will be responsible for ensuring the accuracy and validity of all prescriptions dispensed by the telepharmacy. The pharmacist will also be responsible for providing counseling to all patients at the telepharmacy for new prescriptions and as requested for refill prescriptions, OTC medications, or other health information questions.
 - d. The pharmacists on duty for telepharmacy and the technician at the telepharmacy will be responsible for recording Continuous Quality Improvement data to include metrics such as consultation and error rates.
 - e. The PIC of the telepharmacy will ensure monthly controlled substance inventory counts are recorded.
3. Technology Safeguards
- a. Managing Pharmacy will install telepharmacy audio / visual equipment from TelePharm. This equipment will provide an audio / visual link between the managing and remote location and also allow for HIPAA compliant counseling of patients. The telepharmacy cannot operate as a telepharmacy if the audio / visual link cannot be established and no prescriptions may be filled or dispensed.
 - b. The technician at the telepharmacy site will utilize barcode technology and the Tech Check module in the dispensing software to verify the products of all prescriptions filled.
 - c. The telepharmacist on duty at will use the audio / visual link to check the hard copy of new prescriptions, the prescription label, and the contents of the package. The pharmacist will be responsible for the accuracy and validity of the finished prescription product and marking it as complete in the TelePharm software.

Appendix C: Pharmacist Monthly Inspection Checklist

Telepharmacy Site _____ DayTime of Visit _____

Inspected By _____

| | Checklist Item | Y/N | Comments |
|----|---|-----|----------|
| 1 | Is a notice conspicuously displayed on the registered pharmacy premises detailing the name and registration number of the responsible pharmacist and the fact that a pharmacist is accessible for consultation at any time? | | |
| 2 | Are pharmacy technicians following proper Consultation procedure? | | |
| 3 | Audit 20 filled prescriptions, are they accurate? | | |
| 4 | Audit 10 hard copies, is proper documentation being observed | | |
| 5 | Observe technicians filling a prescription, are proper SOP being followed? | | |
| 6 | Are customers greeted immediately upon entry? | | |
| 7 | Are proper inventory control SOP being followed? | | |
| 8 | Check 10 shelf bottles on shelf, are any of them expired? | | |
| 9 | Are all staff in clean and proper uniforms and nametags are prominently visible? | | |
| 10 | Is the CII cabinet locked and the key stored appropriately? | | |
| 11 | Are patient required references in clear view? | | |
| 12 | Is the filling area clear and uncluttered? | | |
| 13 | Is the store area clear and uncluttered? | | |
| 14 | Walk the perimeter, are there any concerns? | | |
| 15 | Are the bathrooms clean and tended to? | | |



*P.O. Box 125
604 North Parkway Street
Wayland, IA 52654
877-766-7384*

September 16, 2015

Re: Wayland, IA Telepharmacy

To Whom it May Concern:

My name is John Mitchell, President of MD Orthopaedics, Inc. in Wayland, Iowa where we manufacture orthopaedic braces for children with clubfoot deformity. Since 2005, my business has been part of the Wayland community and currently employs 23 individuals from the Wayland area and surrounding communities.

I feel a local pharmacy would be a great asset to the community and a boost to the Wayland medical clinic. This would provide a convenient way for employees to fill their prescriptions without finding it necessary to use precious PTO hours.

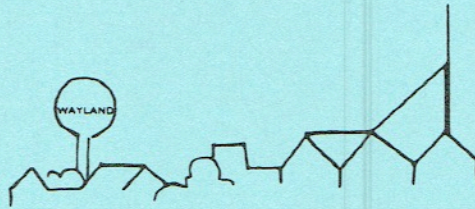
While the medical clinic itself is convenient for appointments, employees often still find it necessary to drive 12-20 miles to fill a prescription.

Please feel free to contact me or my Business Manager, Emily Ferguson, if you should require further information or feedback.

Sincerely,

A handwritten signature in black ink that reads 'John R. Mitchell'. The signature is fluid and cursive, with a large loop at the beginning of the word 'John'.

John R. Mitchell
President



BEST TOWN
OF ITS SIZE
IN IOWA

WAYLAND ECONOMIC DEVELOPMENT CORPORATION

Wayland, Iowa 52654

August 18, 2015

Reference – Wayland Telepharmacy

To Whom It May Concern:

My name is Russell Yoder, President of the Wayland Economic Development Corporation. The Wayland community has always been supportive in keeping medical services in the town. The Economic Development purchased the doctor's building and has been managing the clinic for years. The clinic continues to grow in usage with the professional staffing of the local hospital.

A pharmacy would be a great asset to this rural community. The closest pharmaceutical service is between 12-20 miles away depending on your personal doctor. By having the pharmacy in the local clinic, people can receive their medication without driving out of town. We are seeing that many of our senior citizens are unable to drive out of town and are needing assistance to be able to receive their prescriptions.

The Economic Development has already funded the necessary financing required to start the pharmacy. I feel this shows the community's support for this project.

We are excited as a Development Committee and are more than happy to answer any further questions you may have.

Thank you in advance.

Sincerely,

Russell Yoder,
President



August 18, 2015

Re: Telepharmacy in Wayland

To Whom It May Concern:

I am Robert Meyer, President of the Wayland State Bank. I am a lifelong resident of the Wayland community. I have been employed with the bank for 40 years.

Wayland has always been interested and supportive of health care in our community. When the doctor decided to retire, the community raised the money to buy his building and rented it to the local hospital as a medical clinic. It has been a huge success, and this is the site where the new pharmacy will be located.

Currently, we have to go between 12-20 miles to fill a prescription. Many of our senior citizens are not able to drive out of town and find it a real inconvenience to get their prescriptions filled.

We also have a nursing home with 34 skilled nursing rooms, 25 independent living apartments, and 19 living facilities that would benefit from being able to use this local service.

The community is excited about the possibility of having this service in their community.

The Economic Development Corporation has already funded the startup requirements. This alone is an example of how excited and supportive of bringing this service to the Wayland area.

If I can be of further assistance on this matter, please feel free to contact me.

Sincerely yours,

A handwritten signature in blue ink that reads 'Robert G. Meyer'.

Robert G. Meyer
President

P O BOX 157
WAYLAND IA 52654-0157
319-256-5000
319-256-2265 FAX

MEMBER FDIC
waylandstbank.com
WSBank@Farmtel.Net

301 S. MAIN STREET
MT. PLEASANT IA 52641-2226
319-385-8189
319-385-8234 FAX

August 18, 2015

RE: Telepharmacy in Wayland

To Whom It May Concern:

My name is Bradley Roth and I am a lifelong resident of Wayland. I was a City Council member for 20 years and since 1998, am serving as the Mayor of the City of Wayland. I am also a member of the Wayland Economic Development Corporation.

Keeping medical services in Wayland has always been a priority. We were fortunate to have the services of a doctor for many years and at his retirement, the community pooled resources to buy the building and rent to the County hospital as a medical clinic. Telepharm will be located within the medical clinic building which is a perfect counterpart to our successful medical clinic.

With a travel distance of up to 20 miles to fill a prescription, a hometown pharmacy will be a great asset to Wayland, especially for our senior citizens who have difficulty traveling out of town to get their medicine. The nursing home complex in Wayland would benefit from being able to use a local pharmacy for their prescription needs also.

Feedback from Wayland citizens has been extremely positive and supportive. The Economic Development Corporation, City Council, local businesses and residents are excited to have this service in our community.

Sincerely,



Bradley Roth, Mayor
City of Wayland

Orval Miller & Sons

Lennox heating and air • Backhoe, trenching and well work • Plumbing and drain work
Sewer camera and duct cleaning • Geothermal HVAC

To Whom It May Concern:

My name is Josh Miller, local business owner, farmer and member of the Wayland Economic Development Corporation. I have been a lifelong resident of the Wayland community. I have always had great pride in our community.

Medical services in Wayland is very important to me. We feel very fortunate to have a clinic in town to help meet the medical needs of our residents. I am very excited to have the opportunity to add the services of Telepharm. This will further advance the services offered to our community, furthermore, Telepharm would be an important convenience to our residents (especially senior citizens) considering the nearest pharmacy is 12-20 miles away.

I have talked to numerous people around town, and collected feedback about Telepharm. I have had nothing but positive responses. Everyone I have talked to is excited about the opportunity they have the services of Telepharm.

Sincerely,



Josh Miller

My name is Tim Egli, owner of Egli Landscapes Inc. We serve Southeast Iowa with several landscape services including design, installation and management of properties. I have been a part of the community for over 12 years and have been privileged with serving the community through donations, community service and by serving on the Wayland Lions Club, as a local bank director and with our current Wayland Economic Development Corporation.

I believe the new pharmacy would bring local jobs. It may only be a few, however in this economy for small communities this is a major asset. Another benefit would be our local aging population will now have quick, easy access to knowledgeable staff to aid them when medications are needed. Along with our Wayland Clinic this fit would be great as our nurse practitioners and physician's assistants will have easy access to the prescriptions. Their current patients would have an environment where they don't have to get bounced around to find what they need. This, in my opinion, would benefit these individuals greatly especially in the winter months when they will not want to venture out on risky roads.

Having a local pharmacy would benefit me as I need monthly prescriptions for my own health reasons. As for my organization, it now allows them to go over a lunch time or at the end of a day to get their needs taken care of, so they can go home and not make an out of the way stop. Most of my team live away from any larger towns such as Washington or Mt. Pleasant.

We also have our local nursing home... Park View. This I believe would be a viable customer for a pharmacy as long as they can bring competitive prices and possibly a delivery service being they would only be three blocks away.

In closing, having a pharmacy in Wayland would be a good asset as it bring a service we currently do not have and in the medical field competitive pricing and professional service will always win. Yes, I have only been here 12 years. However, in that time, my experience is that if you become a part of the community as a business and you serve a need you will become successful.

Cordially,

A handwritten signature in black ink, appearing to read 'Tim Egli', written in a cursive style.

Tim Egli

September 11, 2015

RE: Telepharmacy in Wayland


To Whom It May Concern:

My name is Barry Leichy and I am a member of the Wayland Economic Development Corporation. I have been employed by the City of Wayland 24 years and prior to that, worked 14 years with a local plumbing, heating, and air conditioning business in Wayland.

Our medical clinic has served us well. It is used by me and other family members and it has proven its worth to our community. Having a telepharmacy business added to Wayland will make it a more viable place to live, work, and play.

Wayland is not your everyday, small community. We have industrial, commercial and residential and agricultural based businesses here that allow many families to live and work in the community.

We look forward to your consideration of Wayland as the perfect place for a telepharmacy.

Sincerely, 

Barry D. Leichy

September 14, 2015

RE: Telepharmacy in Wayland

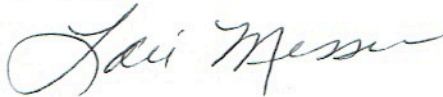
To Whom It May Concern:

My name is Lori Messer. I am a lifelong resident of Wayland and have owned and operated my beauty salon in Wayland for over 30 years. I am also a member of Wayland Economic Development Corporation and an avid volunteer in the Wayland area.

Wayland is a great supporter of health care in our community. We have a medical clinic as well as a Dental Office and Fitness Center. Having a telepharmacy would be a great asset and would complement our existing health related businesses. We currently have to travel 12-20 miles to fill a prescription, which is difficult for many who are elderly.

The Wayland Economic Development Corporation has invested the funds for the telepharmacy, secure in knowing that the Community is excited to have this amenity available in their hometown.

Sincerely,

A handwritten signature in cursive script that reads "Lori Messer". The signature is written in black ink and is positioned above the printed name.

Lori Messer

September 29, 2015

Re: Wayland Telepharmacy

To Whom It May Concern:

I am Tawnya Achen, member of the Wayland Economic Development. I am a REALTOR serving in the southeast area. I am a resident of the Wayland community. I have grown up in Wayland and after college moved back to the area; were my husband and our family reside.

A pharmacy coming to our town would be a great asset. We are a small community with a lot of elderly citizens in it. Having a pharmacy would greatly benefit not just the elderly, but the younger generation whom are actively involved in many things. They may not have time to drive to other surrounding towns to get their family medications. Neighboring towns with a pharmacy are 12-20 miles from our community. In addition, talking with other community members, they are eager to have a pharmacy in our town to help with the convenience of everyday life.

We look forward to having the service of a Telepharmacy to help assist our public members. The Economic Development Corporation has already funded the startup requirements. This is how excited and supportive we are to be able to offer this service!

Yours truly,



Tawnya Achen

September 14, 2015

Reference- Wayland Telepharmacy

To Whom It May Concern:

My name is Heather Pratt, a member of the Wayland Economic Development Corporation. I moved to Wayland 5 years ago, and fell in love with community. After moving to Wayland it was not long after I decided the town of Wayland would become the community I call home. Shortly after moving to Wayland I started working at M.D. Orthopaedics. I am currently the Quality Management Representative/ Manufacturing Coordinator.

Having a pharmacy come to Wayland would be a huge asset to our community. Currently the closest pharmacy is 12-20 miles from Wayland. There are several elder citizens in the community who cannot drive and depend on other individuals to pick up their prescriptions for them.

The opportunity of getting a pharmacy in town has been quite the talk. Needless to say our community is very excited with the possibility of getting a pharmacy. Several people are over joyed with the idea of being able to receive their prescriptions while at the local medical clinic. As cold and flu season is just around the corner many mothers are pleased with the thought of having a local pharmacy on site with the medical clinic.

Not only does Wayland offer a medical clinic we also have a nursing home, 25 independent living apartments, and 19 living facilities. These facilities would all benefit greatly from having a pharmacy in town.

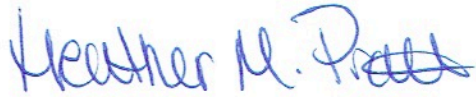
The Economic Development Corporation has already funded the startup requirements. I strongly believe this goes to show how excited and supportive our community is with the idea of a pharmacy coming to our community.

Wayland citizens care deeply about their community and work very hard at making our community desirable to all who visit. Having a pharmacy would help our community that we love dearly be desirable to all others as well.

With great pride in our community we are eager with the possibility of this service coming to the town we call home.

If I can be of further assistance feel free to contact me.

Kind Regards,



Heather M. Pratt
Quality Management Representative/Manufacturing Coordinator
MD Orthopaedics, Inc.
604 North Parkway Street
Wayland, IA 52654
Email: heather@mdorthopaedics.com
Personal: hpratt217@gmail.com

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on Board's agenda is three weeks prior to Board meeting.

IOWA BOARD OF PHARMACY
Petition for Waiver Variance
(check the appropriate box)

Case No. or State ID No.

Rec'd:

(FOR PHARMACY BOARD USE ONLY)

PLEASE PRINT OR TYPE ALL INFORMATION IN INK

A waiver excuses the petitioner from the requirements of a rule in its entirety or from a part of a rule; a variance does not. Instead, a variance is a modification to the requirements of a rule or a part of a rule. Example: A rule requires the fencing of certain property and further requires that the fence be at least 6 feet in height. A waiver of that rule would excuse the petitioner from the requirement for fencing the property. A variance would require the property be fenced but would allow the petitioner to maintain the current fencing configuration of 5 feet in height (perhaps the fence was constructed prior to the height requirement). When replacement of the current fence becomes necessary as a consequence of normal wear and tear, the variance would terminate and the petitioner would be required to comply with the 6-foot height requirement.

Note: Statutory requirements that have been repeated in administrative rules are not subject to consideration for a waiver or variance.

Is this petition an initial request or is it a request for renewal? Initial Request Request for Renewal
If a request for renewal, explain below why the renewal is necessary.

Petitioner Information (include licensee/registrant name and name of contact person, i.e. pharmacist in charge)

Name: TelePharm / Adam Chesler Phone No.: 319-535-0571
a.k.a. Lake Park Pharmacy (include area code)
Address: 105 Iowa Ave Ste #231

City: Iowa City State: IA Zip Code: 52240

Petition Information

- Chapter Number and Title.
Chapter 9, AUTOMATED MEDICATION DISTRIBUTION SYSTEMS AND TELEPHARMACY SERVICES
- Rule Number(s) and Title(s).
9.3 (2) *Telepharmacy.*
9.5 (2)c *Need for remote dispensing site.*
- Describe in your own words the essence of each Rule Number(s) and Title(s) that pertains to this petition.
9.11 (2) By waiving rule 657—9.11(2), the Board of Pharmacy would allow a Certified Pharmacy Technician to perform these tasks in place of an AMDS. An independent telepharmacy platform will be used to manage and oversee all telepharmacy operations.
9.5 (2)c By waiving rule 657—9.5(2)c, the Board of Pharmacy would allow a telepharmacy to be located within 15 miles of another pharmacy. This will allow residents in these communities to have local access to a pharmacist.

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on Board's agenda is three weeks prior to Board meeting.

4. Describe the specific nature and scope of your petition. In your description, include the anticipated time period (beginning and ending) for which the petition would apply. A waiver or variance may not be requested or granted on a permanent basis; the petition must identify an end date.

A new pharmacy will be opened with the community to give residents local access to a pharmacist. Please see the attached document with additional information as described in the "Telepharmacy Petition Requirements 5-2014" document.

5. Describe the relevant facts and reasons that, in your opinion, justify and provide "clear and convincing evidence" as to why this petition merits consideration for waiver or variance. In your description, explain why the rule(s) poses an undue hardship. If there is a public health, safety and welfare issue associated with this rule(s), or if this rule(s) addresses security or confidentiality issues, also explain how equal protection will be maintained if this petition were granted.

Telepharmacies in the state have operated safely and successfully since 2012. As the population in these small, rural areas is aging, the residents can benefit from having more direct access to pharmacy services, pharmacist oversight of OTC medication, and direct access to a pharmacist in the community. This is a critical service for the future of rural communities throughout the state.

6. Does anyone else (inside or outside state government) possess knowledge relevant to this petition?

Yes No Do not know

If yes, list their names, addresses and phone numbers below.

Marie Matthiesen, City of Lake Park, (712) 832-3527

7. Would anyone (inside or outside state government) be adversely affected if this petition were granted?

Yes No Do not know

If yes, list their names, addresses and phone numbers below.

8. Do you know how the Board of Pharmacy has treated similar situations?

Yes No

If yes, describe below how similar situations were handled.

Waivers have been granted to the five (5) locations in the state. These locations have been operating safely and effectively for the past three years. This site will conform to the same operating policies and procedures and use the same technology and safety protocols as the existing telepharmacy locations.

9. Have you had any past interaction with the Board of Pharmacy that might impact or relate to this petition?

Yes No

If yes, describe below the issue involved and the outcome.

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on
Board's agenda is three weeks prior to Board meeting.

A request was submitted for consideration at the Board meeting on August 31, 2015 and discussion was
tabled until the November meeting.

I authorize any person with knowledge of the relevant or important facts relating to this petition to release any
pertinent information to the Iowa Board of Pharmacy. I hereby attest to the accuracy and truthfulness of the
information contained herein.



Petitioner's Signature

10/29/2015

Date

Lake Park Telepharmacy Petition

October 29, 2015

Submitted by:

Adam Chelser, PharmD
Vice President of Operations
TelePharm
105 Iowa Ave Ste #231
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A. Establish the need for remote pharmacy site (telepharmacy practice)

1. Identify all pharmacies within a 25-mile radius of the proposed remote pharmacy site and distance of each pharmacy from the proposed remote pharmacy site

All pharmacies within a 25-mile radius of the proposed remote pharmacy site:

Walmart Pharmacy
2200 17th St
Spirit Lake, IA 51360
11.7m

Hy-Vee Clinic Pharmacy
1012 Okoboji Ave
Milford, IA 51351
17.6m

Lewis Family Drug
2200 17th St
Spirit Lake, IA 51360
11.9m

Hy-Vee Pharmacy
1500 18th St
Spirit Lake, IA 51360
12.4m

Walmart Pharmacy
500 11TH St SW
Spencer, IA 5130
31.8m

White Drug
400 Grand Ave
Spencer, IA 51301
30.4m

Hartley Hometown Pharmacy
177 S Central Ave
Hartley, IA 51346
26.7m

Lewis Family Drug
420 2nd Ave
Sibley, IA 51249
24.5m

Hy-Vee Clinic Pharmacy
1012 Okoboji Ave
Milford, IA 51351
17.6m

Hy-Vee Pharmacy
819 Grand Ave
Spencer, IA 51301
30.3m

Walgreens
800 Grand Ave
Spencer, IA 51301
30m

2. Distance to the pharmacy nearest to the proposed remote pharmacy site

11.7 miles

3. Distance between the managing pharmacy and the proposed remote pharmacy site

289 miles

4. Population of the community

783

5. Is the community in a critical access area

No

6. Identify prescribing practitioners currently practicing in the community, if any

Lake Park Clinic

Denise Hemphill, ARNP

7. Average number of prescriptions per day anticipated

20-40 prescriptions

8. If there was a pharmacy formerly located in the community, when did the pharmacy close and how long had the pharmacy been located in the community? Is there currently a pharmacy in the community with plans to close? If so, when is the anticipated closing?

The previous pharmacy closed more than 10 years ago

9. How and from where do residents of the community currently obtain their prescription medications?

Most residents travel to Spirit Lake to the Walmart, White Drug or Hy-Vee.

10. Will the remote pharmacy site be located in a medically underserved area (per federal definition)?

No

11. Will the remote pharmacy site be located near a rural health clinic (per 42 USC § 1395)?

Yes, Sanford Clinic - Lake Park

12. Will the remote pharmacy site be located near a federally qualified health center?

No

13. Will the remote pharmacy site be located near a health care facility?

Yes, Sanford Clinic - Lake Park

14. Will the remote pharmacy site provide unique services that are not available from other area pharmacies?

No

B. Remote pharmacy site operational plan (submitted with initial license application)

1. Name and address of managing pharmacy and remote pharmacy site

Managing pharmacy

NuCara Health Solutions

1150 5th Street Suite 150

Coralville, IA 52241

Remote pharmacy site

Lake Park Pharmacy
219 Market St
Lake Park IA 51347

- 2. Will automated dispensing equipment be used to dispense prescription drugs from the remote pharmacy site? If so, what type of automated system will be used and to what extent will dispensing be automated?**

No automated dispensing equipment will be used to dispense prescription drugs from this remote pharmacy site.

- 3. Name and address of owner(s) of managing pharmacy and remote pharmacy site**

Managing pharmacy

NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

Remote pharmacy site

TelePharm
105 Iowa Ave, Ste 231
Iowa City, Iowa, 52240

- 4. Name and address of pharmacist in charge of managing pharmacy and remote pharmacy site**

Pamela Wong Wiltfang
NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

- 5. Name and address of certified pharmacy technician who will be the technician in charge of the remote pharmacy site**

This will be determined after approval of this site, and will be submitted with the initial license application.

- 6. Identification of all remote pharmacy sites managed by the managing pharmacy**

NuCara Pharmacy State Center, IA
NuCara Pharmacy Zearing, IA

- 7. Scale drawing of the remote pharmacy site that illustrates the following:**
a. Layout and location of all systems and system components

- b. Location of patient counseling area**
- c. All access points to the electronic record-keeping system and drug inventory**

The location will be constructed using a standard pharmacy layout including a full community pharmacy prescription department, an OTC department for basic medical supplies, and a private clinical consultation room to be used for patient counseling and other private activities. It will also be handicapped accessible and secured with 24/7 motion and alarm systems. The details of this location will be determined after approval of this site, and will be submitted with the initial license application.



8. Description of the proposed telepharmacy practice including days and hours of operation and the remote pharmacy site's anticipated opening date

Please see Appendix A for the description of the telepharmacy practice. The anticipated opening date will be June, 2016.

9. Policies & Procedures for the telepharmacy service

Please see Appendix B for the Telepharmacy Policies & Procedures

10. Proposed staffing, identifying all individuals/positions involved with the telepharmacy service from the managing pharmacy and the remote pharmacy site, and including the responsibilities of each staff member

- a. All technicians practicing at the remote pharmacy site must be nationally certified and registered with the Board**
- b. All technicians practicing at the remote pharmacy site must have a minimum one year of Iowa pharmacy practice as a pharmacy technician**

The proposed staffing will be determined after approval of this site, and will be submitted with the initial license application. Our target technician will have 5+ years of experience. Prior to opening the technician will work in an established telepharmacy for training.

11. Plan for training personnel practicing at managing pharmacy and remote pharmacy site

The personnel which will oversee the remote pharmacy site from the managing pharmacy all have experience working with the remote pharmacy sites currently operating in Iowa.

The technicians hired to work at the remote pharmacy site will train in an operating telepharmacy during the month prior to starting at the remote pharmacy site. They will be trained according to best practices and standard operating procedures developed at these locations.

12. Identification and description of technology and communication systems to be used between the managing pharmacy and the remote pharmacy site

EnterpriseRx dispensing and Point-Of-Sale system will be used for general operations. The telepharmacy software for remote verification and patient counseling will be provided by TelePharm. EnterpriseRx has been chosen because of the 2-way interface between TelePharm and EnterpriseRx. The data between both systems will have an identical patient database that can be accessed in both sites in real-time. Technicians and Pharmacists both have unique username and passwords with specific roles. For example a pharmacist will have every patient's full profile readily available from any remote dispensing site which they are assigned to oversee.

a. Type of audio-visual link and communication will be utilized between the managing pharmacy and the remote pharmacy site

The audio-visual link that will be utilized is a HIPAA-compliant peer-to-peer secure HD video conferencing protocol utilized in TelePharm's technology platform. This technology is in over 100 pharmacies in 8 different states with 100% success rate of pharmacies operating.

b. Will the link between the managing pharmacy and the remote pharmacy site be a constant, live, or real-time connection; if not, how and when will the link be activated; will the pharmacist be able to open a visual or audio link from the managing pharmacy without the assistance or interaction of the remote pharmacy site personnel

There will be a live camera feed showing an overview of the pharmacy and the operations which will be readily available by the pharmacist at all times. They will be able to open this link from the managing pharmacy without the assistance or interaction of staff at the remote pharmacy site. In addition, a real-time connection will be made on demand between the pharmacist and patients, as well as technicians. This link can be initiated by pharmacists, technicians, or patients.

c. Will multiple camera views be available from the remote pharmacy site; who controls the camera views

Yes, multiple camera views will be available. The pharmacist at the managing pharmacy can control these camera views. Every part inside the pharmacy will be viewable from the cameras.

d. Will bar-code technology be utilized; if so, how and by whom

Yes, there will be two different bar-code technologies utilized at the telepharmacy:

1. Each prescription has a bar-code which needs to be scanned to open the prescription and begin the filling process
2. The NDC on the stock bottle will need to be scanned prior to filling the prescription
3. Each person who accesses TelePharm's system will have a unique user-id and password. Every action within the TelePharm system is tracked from opening a prescription record, capturing images and initiating counsel sessions.

13. Drug and record security and confidentiality at the remote pharmacy site

All employees will receive additional training pertaining to drug and record security and confidentiality. Additional areas of focus will include patient privacy, FWA, and cultural competency. Data will be transmitted through a HIPAA-compliant secure HTTPS connection to our data servers and stored using 256-bit AES encryption. Standard operating procedures will also be implemented to ensure drug and record security and confidentiality.

14. Record-keeping systems and location

a. Type of electronic/digital record-keeping system with the remote pharmacy site utilize for tracking and recording of dispensing activities and telepharmacy communications

b. Length of time that recorded data will be retained

Enterprise RX software will be utilized for record-keeping to track and record dispensing activities. The Enterprise RX system has a two-way integration into the telepharmacy system provided by TelePharm. Telepharmacy communications will be tracked and recorded through TelePharm software. Recorded data will be retained for a minimum of 10 years. All data and audit logs are readily available and our mirrored databases within both systems to the managing pharmacy.

15. Drug inventory and control

a. Will the remote pharmacy site maintain a stock supply of prescription drugs

Yes, the remote pharmacy site will maintain a limited stock supply of prescription drugs. The specific formulary for this location will be determined based on the need of the patients in the community.

b. Will the remote pharmacy site stock and dispense controlled substances; if so, where and how will controlled substance stock be maintained

Yes, the remote pharmacy site will maintain a limited supply of controlled substances. The specific formulary for this location will be determined based on the needs of the patients in the community. Controlled substance stock class 3-5 will be dispersed throughout the regular inventory, and will be checked bi-annually through inventory. Ordering trends will be monitored from the corporate office. CII drugs will only be ordered and stored on a requested basis by the local clinics/physician. CII drugs will be kept in a locked, secure location and a perpetual inventory will be kept and inspected on at least a monthly basis.

c. How will drugs be packaged for dispensing to the patient and who will package and label the patient's prescription

All prescriptions will be packaged and labeled by the certified pharmacy technicians working on-site at the remote pharmacy site. They will only be dispensed to the patient after they are verified by the pharmacist.

d. How often will noncontrolled prescription drugs be inventoried and by whom

The pharmacist will inventory the noncontrolled prescription drugs perpetually with software, and will conduct a manual inventory bi-annually.

e. How often will controlled substances be inventoried and by whom (suggest pharmacist in charge or pharmacist designated by pharmacist in charge)

The Pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge will ensure controlled substance inventory counts are recorded. Class 3-5 controlled substances will be monitored perpetually in the software, and reconciled bi-annually. CII inventory will be monitored perpetually in the software and will be reconciled at least once monthly.

f. If a perpetual inventory for controlled substances is utilized, who will reconcile the perpetual inventory to the physical inventory and how frequently (suggests monthly reconciliation by pharmacist in charge or pharmacist designated by pharmacist in charge)

Perpetual inventory will be utilized for controlled substances located at the remote site. Class 3-5 controlled substances will be reconciled biannually by the pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge. For Class 2 controlled substances, the pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge will reconcile the CII inventory at least monthly.

16. Scope of clinical pharmacy services to be provided at remote pharmacy site and who will provide those services

A comprehensive guide of services will be provided on-site, and tailored to the community's needs based on dialogue and relationships with the local prescribers and other healthcare providers. These services may include but are not limited to:

1. Medication Therapy Management

2. Comprehensive Medication review
3. Immunizations
4. Drug/Disease state education
5. Respiratory therapy
6. Durable medical equipment
7. Direct video link into clinic for clinical pharmacy services
8. Point-of-care testing with pharmacist on-site
9. Medication Synchronization

17. Continuous quality improvement plan and how it will be implemented and utilized

The pharmacists on duty for telepharmacy and the technician at the telepharmacy will be responsible for recording Continuous Quality Improvement (CQI) data to include metrics such as consultation and error rates. The staff will also utilize third party reporting for quality events. CQI events will be monitored from the corporate level to determine adjustments to best practices in order to prevent further occurrences.

18. System downtime plan and procedures

The telepharmacy cannot operate if the audio / visual link cannot be established and no prescriptions may be filled or dispensed. All dispensing activities will halt until the audio / visual link can be re-established. A cellular backup connection will be evaluated depending on the speed and reliability.

19. Processes for ensuring safety and security of patients and staff

Disaster preparedness plans will be included in the training for pharmacy staff. These plans include processes to ensure the safety and security of patients and staff. Additionally, cameras will be placed throughout the store.

20. Patient counseling process including plans to ensure security of patient information and privacy for discussions with patients

Managing Pharmacy will install telepharmacy audio / visual equipment from TelePharm. This equipment will provide an audio / visual link between the managing and remote location and also allow for HIPAA compliant counseling of patients. Patient counseling will be required and enforced with Telepharm software, compliant with Iowa consultation laws.

21. How toll-free telephone service will be provided and available to patients for direct contact with the managing pharmacy

Signs will be placed throughout the store alerting customers how to contact the managing pharmacy. Additionally, a pharmacist will always be available at the managing pharmacy through the TelePharm software to communicate with patients. Any calls coming into the remote pharmacy can easily be transferred directly to the pharmacist.

22. Schedule and process for periodic inspection of remote pharmacy site

a. How often will a pharmacist from the managing pharmacy inspect the remote pharmacy site

A pharmacist from the managing pharmacy will inspect the remote pharmacy site at least once per month.

b. What will be included in periodic inspection at the remote pharmacy site and who will conduct the inspection

Please see Appendix C for the monthly inspection checklist which will be conducted by a pharmacist from the managing pharmacy.

c. What will be the process to address discrepancies

Discrepancies will be followed with an immediate action plan to resolve and prevent further discrepancies. All reporting from each inspection will be reported to the corporate office for further evaluation.

23. Identification of information and data that will be provided in periodic reports to the Board

The telepharmacy site will provide the Board with periodic reports including, but not limited to, the following information:

- Documented information regarding specific pharmaceutical services provided to patients at the remote pharmacy site
- Number of prescriptions dispensed from the remote pharmacy site
- Number of prescriptions which came directly from the local clinic
- Identification of errors in dispensing from the remote pharmacy site by type of error and actions taken to resolve and prevent future errors by type
- Information regarding interactions with prescribers and community outreach efforts to patients and prescribers
- Successful counseling rate at the remote pharmacy site including comparison with counseling rate at the managing pharmacy
- Number of hours a pharmacist was physically present at the remote pharmacy site
- Number of hours the remote pharmacy site was open for business
- Plans for future onsite pharmacist staffing and criteria used to determine the need for onsite pharmacist staffing
- Patient surveys on satisfaction and care received

24. Specific identification of “technician in charge” – include qualifications

The “technician in charge” at the telepharmacy will be determined after approval of this site, and will be submitted with the initial license application.

25. Prohibit the OTC sale of controlled substances from remote pharmacy site when the pharmacist is not physically on-site

No OTC controlled substances will be sold from the remote pharmacy site when the pharmacist is not physically on-site.

26. Prohibit a pharmacist intern from practicing at the remote pharmacy site unless a qualified pharmacist is physically present at the remote site to supervise the pharmacist intern

Pharmacist interns will not be allowed to practice at the remote pharmacy site unless a qualified pharmacist is physically present at the remote site.

Appendix A: Description of the Telepharmacy Practice

This location will be implemented according to a proven template for telepharmacy operations that has been used in the current telepharmacy sites, specifically the Zearing and State Center locations. The pharmacist will be on site for face-to-face interactions with patients at least one day per month.

- The pharmacist will be physically located at the Managing Pharmacy and will be readily available to the technicians and patients at the Telepharmacy Site at all times. The pharmacist will continue to have ultimate authority over the dispensing process.
- The prescription department will be staffed by certified pharmacy technicians. The pharmacist-technician relationship will remain important as the pharmacist will utilize new technologies and the leadership of head technicians to maintain safety protocols for patients.
- All pharmacy technicians working at the telepharmacy site will be required to obtain and maintain current Certified Pharmacy Technician (CPhT) status through the Pharmacy Technician Certification Board (PTCB). They will also be required to have the following:
 - Minimum of two years experience working in an Iowa pharmacy
 - Must adhere to all other rules and regulations set forth by the Iowa Board of Pharmacy
- Technicians will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules
- Prescriptions will be filled according to all the standard operating procedures of a pharmacy. As the technician is filling the prescription, they will capture images of all steps which require pharmacist verification to provide to the verifying pharmacist. These images, along with any other documentation, will be sent to the pharmacist to verify the dispensing and clinical accuracy of the prescription. The prescription must be verified by the pharmacist before it is able to be dispensed to the patient.
- All of the information about the prescriptions filled at the Telepharmacy will be recorded and maintained in secure records with redundant backups for 10 years. This audit trail is readily available for any prescription processed at the Telepharmacy.
- A supervisor will travel to the Telepharmacy site once per week for the first month of operation to ensure policies and procedures are being followed.
- A pharmacist will travel to the Telepharmacy at least one time per month to perform a detailed inspection at the site and have face-to-face time with patients. While the pharmacist is on site, (s)he will verify all policies and procedures are being properly followed. When a pharmacist is not available on site, all verification and counseling will be provided by an Iowa licensed pharmacist.

- Medication counseling and responding to patient questions will be completed through a secure video connection in a private area when the medications are dispensed to the patient. Pharmacists will be readily available for consultation with patients, prescribers, and other care providers through a secure video connection. All patients will be required to review prescription information that includes side effects and warnings prior to the counseling session. All new prescriptions will require pharmacist counseling.

An Iowa licensed pharmacist at the managing pharmacy will remotely verify prescriptions and counsel patients. The pharmacist will be on site to visit each telepharmacy at least monthly, and pharmacist presence will increase as patient growth allows in order to maximize the in-person pharmacist-patient relationship.

Experienced Certified Pharmacy Technicians (CPhT) will be hired to work at the telepharmacy. There will be at least 1 technician staffing the location daily, with an additional technician on call as needed. Every effort will be made to hire technicians who reside in or around the community for ease of commute and connection to the community.

The telepharmacy will initially have approximate hours from 9:00am - 5:00pm Monday through Friday with variations depending on specific community need. Evening hours as well as Saturday hours will be considered.

Appendix B: Telepharmacy Policies & Procedures

POLICIES

1. Managing Pharmacy will operate and maintain a local telepharmacy that will provide access to critical pharmacy services to the community.
2. Managing Pharmacy will ensure that all Iowa Board of Pharmacy telepharmacy rules (Chapter 9) are followed while operating as a telepharmacy, with the exception of the waiver of the AMDS requirement
3. Managing Pharmacy will ensure that available technology is utilized in the operation of the telepharmacy location to protect the health and safety of all patients.
4. All Managing Pharmacy Operational Policies and Procedures will apply to the telepharmacy unless contradicted by the specific telepharmacy procedures as described in this section.
5. All pharmacy technicians working at the telepharmacy sites will be required to obtain and maintain current Certified Pharmacy Technician (CPhT) status through the Pharmacy Technician Certification Board (PTCB). They will also be required to have the following:
 - a. Minimum of one year experience working in an Iowa pharmacy
 - b. Training in a telepharmacy setting before beginning at the remote pharmacy site
 - c. Must adhere to all other rules and regulations set forth by the Iowa Board of Pharmacy
6. Technicians will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules
7. Technicians will be responsible for recording Continuous Quality Improvement data to include metrics such as consultation and error rates.

PROCEDURES

1. Pharmacy Overview
 - a. Managing Pharmacy will maintain a licensed community pharmacy.
 - b. The Pharmacist in Charge (PIC) in the community will be responsible for the oversight and operation of the telepharmacy. The PIC will be a pharmacist from the Managing Pharmacy location that has been previously trained on telepharmacy policies and procedures.
2. Personnel Responsibilities
 - a. The PIC will be responsible for the oversight of the telepharmacy operation. The PIC will develop and maintain the Operational Policies and Procedures of the telepharmacy and is responsible for training the staff of the telepharmacy and the managing pharmacists in the legal and safe operation of the telepharmacy.

- b. While operating as a telepharmacy, the pharmacy will be staffed with a Certified Pharmacy Technician at all times. The CPhT will be responsible for all technical functions performed at the telepharmacy. The technician will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules.
 - c. The current pharmacist on duty for telepharmacy will be responsible for ensuring the accuracy and validity of all prescriptions dispensed by the telepharmacy. The pharmacist will also be responsible for providing counseling to all patients at the telepharmacy for new prescriptions and as requested for refill prescriptions, OTC medications, or other health information questions.
 - d. The pharmacists on duty for telepharmacy and the technician at the telepharmacy will be responsible for recording Continuous Quality Improvement data to include metrics such as consultation and error rates.
 - e. The PIC of the telepharmacy will ensure monthly controlled substance inventory counts are recorded.
3. Technology Safeguards
- a. Managing Pharmacy will install telepharmacy audio / visual equipment from TelePharm. This equipment will provide an audio / visual link between the managing and remote location and also allow for HIPAA compliant counseling of patients. The telepharmacy cannot operate as a telepharmacy if the audio / visual link cannot be established and no prescriptions may be filled or dispensed.
 - b. The technician at the telepharmacy site will utilize barcode technology and the Tech Check module in the dispensing software to verify the products of all prescriptions filled.
 - c. The telepharmacist on duty at will use the audio / visual link to check the hard copy of new prescriptions, the prescription label, and the contents of the package. The pharmacist will be responsible for the accuracy and validity of the finished prescription product and marking it as complete in the TelePharm software.

Appendix C: Pharmacist Monthly Inspection Checklist

Telepharmacy Site _____ DayTime of Visit _____

Inspected By _____

| | Checklist Item | Y/N | Comments |
|----|---|-----|----------|
| 1 | Is a notice conspicuously displayed on the registered pharmacy premises detailing the name and registration number of the responsible pharmacist and the fact that a pharmacist is accessible for consultation at any time? | | |
| 2 | Are pharmacy technicians following proper Consultation procedure? | | |
| 3 | Audit 20 filled prescriptions, are they accurate? | | |
| 4 | Audit 10 hard copies, is proper documentation being observed | | |
| 5 | Observe technicians filling a prescription, are proper SOP being followed? | | |
| 6 | Are customers greeted immediately upon entry? | | |
| 7 | Are proper inventory control SOP being followed? | | |
| 8 | Check 10 shelf bottles on shelf, are any of them expired? | | |
| 9 | Are all staff in clean and proper uniforms and nametags are prominently visible? | | |
| 10 | Is the CII cabinet locked and the key stored appropriately? | | |
| 11 | Are patient required references in clear view? | | |
| 12 | Is the filling area clear and uncluttered? | | |
| 13 | Is the store area clear and uncluttered? | | |
| 14 | Walk the perimeter, are there any concerns? | | |
| 15 | Are the bathrooms clean and tended to? | | |



CITY OF LAKE PARK

217 Market St. Box 536

Lake Park, IA 51347

Phone: 712-832-3527 Fax: 712-832-3669

August 12, 2015

To Whom It May Concern:

Why do we need a pharmacy? This was a question that was posed to me. After some thought I decided it was not a matter of "need" but rather a "want". Unlike many other small cities across Iowa who are struggling to survive, we are thriving and growing. Rather than looking at school consolidation we just added an addition due to the need for more space. When looking at our city we can proudly boast that we have many amenities including a grocery store, convenience store, insurance agents, hairstylists, flower shop, dining establishments, chiropractors, nurse practitioner, banking, churches, lawyer, implement dealers, auto repair & parts, community center, library, care center, processing plant, elevator, manufacturing plant, housing developments, plumbing, electricians, building contractors, daycares, and recreational opportunities which include boating & fishing on Silver Lake, camping, city park, swimming pool, bowling, golf, community theatre, historical museum, freedom rock, and a biking & walking trail. So, will our city survive without a pharmacy? Certainly, but the potential that a pharmacy could bring to our city makes it a desirable business opportunity to pursue. A pharmacy would be another amenity that would allow our residents to be able to fulfill their needs without having to drive 15-20 miles. We all know the more services we are able to offer the stronger a city will be. I believe a pharmacy may also aid in making our city an attractive place for further business opportunities such as, but not limited to, a dentist, doctor, and assisted living. The availability of many services locally also presents an attractiveness for families looking to make a home, which then leads to a housing need to be filled. So does Lake Park "need" a pharmacy, no, but Lake Park does want a pharmacy, not only for the additional convenience it offers to our residents but for the future potential it brings with it.

Sincerely

Marie Matthiesen
City Administrator
Lake Park, IA 51347

To whom it may concern,

My name is Julie Baumgarn, I work full time as a hairdresser here in Lake Park, IA. My husband, 3 boys, and I have lived in Lake Park for almost 5 years now.

I am writing to express my support and desire for a pharmacy in town. Currently we have to drive 15 miles to get our prescriptions every time we need them. One of my boys has diabetes and requires insulin and test strip refill prescriptions every month.

Currently, the pharmacy we use has those specific supplies on hand at all times, which we appreciate. When our prescription runs out, the pharmacy faxes a request to his doctor in Sioux Falls. These are time saving options for me, however, I don't always have time to drive over to the pharmacy to get these prescriptions. Having a pharmacy in town, where I could get prescriptions in 5 min instead of 45 would be very helpful for this busy mom.

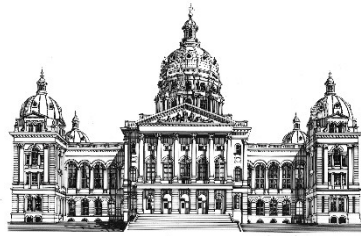
I would say 95 % of the people I have talked to personally are also in support of a local pharmacy. It would be a great, and necessary, addition to a growing community!

Thank you for your time and consideration

Julie

John H. Wills
STATE REPRESENTATIVE
First District
Statehouse: (515) 281-3221
e-mail – john.wills@legis.iowa.gov

HOME ADDRESS
15732 Tradewind Dr.
Spirit Lake, Iowa 51360
Cell: (712) 330-9492



House of Representatives
State of Iowa
Eighty-Sixth General Assembly
STATEHOUSE
Des Moines, Iowa 50319

COMMITTEES
Environmental Protection, *Vice Chair*
Human Resources
Natural Resources
State Government

APPROPRIATIONS SUBCOMMITTEE
Agriculture & Natural Resources

8-28-2015

To Whom It May Concern,

I am House District One, State Representative, who represents Lake Park as part of my district and I have been a part of the community and have worked in the community for 8 years as part of my full-time job in Dickinson County. On top of being a State Representative, I work full-time in the community trying to improve the water quality of Silver Lake through working with landowners and farmers to reduce the amount of pollutants to the lake.

I believe that Lake Park has a population that should have a pharmacy business but the population is not one that can sustain a traditional pharmacy. As a legislator I often talk to elderly or handicapped people who express that not having pharmaceutical services readily available causes them undue problems and issues. This town needs to have a pharmacy but is a relatively small community and so the sustainment of a pharmacy would be difficult.

A pharmacy would impact on the town by reducing travel times for many people who need medication, and by providing a service that is not currently available in the community. The community is an aging community and the ability to have pharmaceuticals available in would be of tremendous benefit.

Currently the closest town with a pharmacy is Spirit Lake and that is approximately 14 miles away. So, because there is no pharmacy in Lake Park a person who is in need of medication needs to drive 28 or more miles round-trip in order to get those drugs from a pharmacy.

The current feeling in the community is a pharmacy needs to be in this town because of the number of people who live here, the number of elderly and handicapped persons, and the distance that people need to drive in order to fill prescriptions.

Sincerely,

John H. Wills
State Representative

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on Board's agenda is three weeks prior to Board meeting.

Case No. or State ID No.

Rec'd:

(FOR PHARMACY BOARD USE ONLY)

IOWA BOARD OF PHARMACY
Petition for Waiver Variance
(check the appropriate box)

PLEASE PRINT OR TYPE ALL INFORMATION IN INK

A waiver excuses the petitioner from the requirements of a rule in its entirety or from a part of a rule; a variance does not. Instead, a variance is a modification to the requirements of a rule or a part of a rule. Example: A rule requires the fencing of certain property and further requires that the fence be at least 6 feet in height. A waiver of that rule would excuse the petitioner from the requirement for fencing the property. A variance would require the property be fenced but would allow the petitioner to maintain the current fencing configuration of 5 feet in height (perhaps the fence was constructed prior to the height requirement). When replacement of the current fence becomes necessary as a consequence of normal wear and tear, the variance would terminate and the petitioner would be required to comply with the 6-foot height requirement.

Note: Statutory requirements that have been repeated in administrative rules are not subject to consideration for a waiver or variance.

Is this petition an initial request or is it a request for renewal? Initial Request Request for Renewal
If a request for renewal, explain below why the renewal is necessary.

Petitioner Information (include licensee/registrant name and name of contact person, i.e. pharmacist in charge)

Name: TelePharm / Adam Chesler Phone No.: 319-535-0571
a.k.a. Nora Springs Pharmacy (include area code)
Address: 105 Iowa Ave Ste #231

City: Iowa City State: IA Zip Code: 52240

Petition Information

1. Chapter Number and Title.

Chapter 9, AUTOMATED MEDICATION DISTRIBUTION SYSTEMS AND TELEPHARMACY SERVICES

2. Rule Number(s) and Title(s).

9.3 (2) *Telepharmacy.*
9.5 (2)c *Need for remote dispensing site.*

3. Describe in your own words the essence of each Rule Number(s) and Title(s) that pertains to this petition.

9.11 (2) By waiving rule 657—9.11(2), the Board of Pharmacy would allow a Certified Pharmacy Technician to perform these tasks in place of an AMDS. An independent telepharmacy platform will be used to manage and oversee all telepharmacy operations.

9.5 (2)c By waiving rule 657—9.5(2)c, the Board of Pharmacy would allow a telepharmacy to be located within 15 miles of another pharmacy. This will allow residents in these communities to have local access to a pharmacist.

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on Board's agenda is three weeks prior to Board meeting.

4. Describe the specific nature and scope of your petition. In your description, include the anticipated time period (beginning and ending) for which the petition would apply. A waiver or variance may not be requested or granted on a permanent basis; the petition must identify an end date.

A new pharmacy will be opened with the community to give residents local access to a pharmacist. Please see the attached document with additional information as described in the "Telepharmacy Petition Requirements 5-2014" document.

5. Describe the relevant facts and reasons that, in your opinion, justify and provide "clear and convincing evidence" as to why this petition merits consideration for waiver or variance. In your description, explain why the rule(s) poses an undue hardship. If there is a public health, safety and welfare issue associated with this rule(s), or if this rule(s) addresses security or confidentiality issues, also explain how equal protection will be maintained if this petition were granted.

Telepharmacies in the state have operated safely and successfully since 2012. As the population in these small, rural areas is aging, the residents can benefit from having more direct access to pharmacy services, pharmacist oversight of OTC medication, and direct access to a pharmacist in the community. This is a critical service for the future of rural communities throughout the state.

6. Does anyone else (inside or outside state government) possess knowledge relevant to this petition?

Yes No Do not know

If yes, list their names, addresses and phone numbers below.

Josh Hveem, Omnitel Communications, (641) 210-8445

7. Would anyone (inside or outside state government) be adversely affected if this petition were granted?

Yes No Do not know

If yes, list their names, addresses and phone numbers below.

8. Do you know how the Board of Pharmacy has treated similar situations?

Yes No

If yes, describe below how similar situations were handled.

Waivers have been granted to the five (5) locations in the state. These locations have been operating safely and effectively for the past three years. This site will conform to the same operating policies and procedures and use the same technology and safety protocols as the existing telepharmacy locations.

9. Have you had any past interaction with the Board of Pharmacy that might impact or relate to this petition?

Yes No

If yes, describe below the issue involved and the outcome.

After filling out form, print, sign, and mail to: Iowa Board of Pharmacy
400 SW 8th Street, Suite E, Des Moines, Iowa 50309-4688. Deadline for inclusion on
Board's agenda is three weeks prior to Board meeting.

A request was submitted for consideration at the Board meeting on August 31, 2015 and discussion was
tabled until the November meeting.

I authorize any person with knowledge of the relevant or important facts relating to this petition to release any
pertinent information to the Iowa Board of Pharmacy. I hereby attest to the accuracy and truthfulness of the
information contained herein.



Petitioner's Signature

10/29/2015

Date

Nora Springs Telepharmacy Petition

October 29, 2015

Submitted by:

Adam Chelser, PharmD
Vice President of Operations
TelePharm
105 Iowa Ave Ste #231
Iowa City, IA 52240
(319) 535-0571
adam.chesler@telepharm.com

A. Establish the need for remote pharmacy site (telepharmacy practice)

1. Identify all pharmacies within a 25-mile radius of the proposed remote pharmacy site and distance of each pharmacy from the proposed remote pharmacy site

All pharmacies within a 25-mile radius of the proposed remote pharmacy site:

Mercy Family Pharmacy Westside
910 N Eisenhower Ave
Mason City, IA 50401
13.9m

Hy-Vee Pharmacy
551 S Illinois Ave
Mason City, IA 50401
8.5m

Mercy Family Pharmacy Regency
621 S Illinois Ave #101
Mason City, IA 50401
8.6m

Houck Pharmacy
101 S Monroe Ave
Mason City, IA 50401
10.6m

Walmart Pharmacy
4151 4th St SW
Mason City, IA 50401

ShopKo Pharmacy
615 S Monroe Ave
Mason City, IA 50401
10.5m

Forest Park Pharmacy
1010 4th St SW Suite 110
Mason City, IA 50401
11.2m

Target Pharmacy
3450 4th St
Mason City, IA 50401
13m

Thrifty White Drug
2 North 4th St
Clear Lake, IA 50428
20.2m

Sheffield Pharmacy
115 Gilman
Sheffield, IA 50475
27.5m

K-Mart Pharmacy
1405 Grand
Charles City, IA 50616
22.3m

Mercy Home Infusion Pharmacy
1000 4th St SW
Mason City, IA 50401
11m

Ver Helst Drug
98 N 10th St
Northwood, IA 50459
30.5m

Mercy Family Pharmacy
104 E Traer St
Greene, IA 50636

26m

Econofoods Pharmacy
20 South 4th St
Clear Lake, IA 50428
20.2m

Hy-Vee Pharmacy
2400 4th St SW
Mason City, IA 50401
11.8m

17. Hy-Vee Drugstore
875 SW 4th St
Mason City, IA 50401
11.7m

Hy-Vee Pharmacy
901 Kelly St
Charles City, IA 50616
19.7m

Smart Pharmacy
616 N 8th
Osage, IA 50461
20m

Brower Pharmacy
140 W 4th St
Ansgar, IA 50472
20.6m

Walgreens
1251 4th St SW
Mason City, IA 50401
11.1m

2. Distance to the pharmacy nearest to the proposed remote pharmacy site
8.5 miles

3. Distance between the managing pharmacy and the proposed remote pharmacy site
148 miles

4. Population of the community

1,407

5. Is the community in a critical access area

No

6. Identify prescribing practitioners currently practicing in the community, if any

Eagle Family Health

Dr Lisa Kies, MD

7. Average number of prescriptions per day anticipated

20-40 prescriptions

8. If there was a pharmacy formerly located in the community, when did the pharmacy close and how long had the pharmacy been located in the community? Is there currently a pharmacy in the community with plans to close? If so, when is the anticipated closing?

The previous pharmacy closed more than 20 years ago

9. How and from where do residents of the community currently obtain their prescription medications?

Most residents travel to Mason City to the Hy-Vee, Shopko, Walgreens or Walmart located there

10. Will the remote pharmacy site be located in a medically underserved area (per federal definition)?

No

11. Will the remote pharmacy site be located near a rural health clinic (per 42 USC § 1395)?

No

12. Will the remote pharmacy site be located near a federally qualified health center?

No

13. Will the remote pharmacy site be located near a health care facility?

Yes, Eagle Family Health

14. Will the remote pharmacy site provide unique services that are not available from other area pharmacies?

No

B. Remote pharmacy site operational plan (submitted with initial license application)

1. Name and address of managing pharmacy and remote pharmacy site

Managing pharmacy

NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

Remote pharmacy site

Nora Springs Pharmacy
11 S Hawkeye Ave
Nora Springs, IA 50458

2. Will automated dispensing equipment be used to dispense prescription drugs from the remote pharmacy site? If so, what type of automated system will be used and to what extent will dispensing be automated?

No automated dispensing equipment will be used to dispense prescription drugs from this remote pharmacy site.

3. Name and address of owner(s) of managing pharmacy and remote pharmacy site

Managing pharmacy

NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

Remote pharmacy site

TelePharm
105 Iowa Ave, Ste 231
Iowa City, Iowa, 52240

4. Name and address of pharmacist in charge of managing pharmacy and remote pharmacy site

Pamela Wong Wiltfang
NuCara Health Solutions
1150 5th Street Suite 150
Coralville, IA 52241

5. Name and address of certified pharmacy technician who will be the technician in charge of the remote pharmacy site

This will be determined after approval of this site, and will be submitted with the initial license application.

6. Identification of all remote pharmacy sites managed by the managing pharmacy

NuCara Pharmacy State Center, IA
NuCara Pharmacy Zearing, IA

- 7. Scale drawing of the remote pharmacy site that illustrates the following:**
- a. Layout and location of all systems and system components**
 - b. Location of patient counseling area**
 - c. All access points to the electronic record-keeping system and drug inventory**

The location will be constructed using a standard pharmacy layout including a full community pharmacy prescription department, an OTC department for basic medical supplies, and a private clinical consultation room to be used for patient counseling and other private activities. It will also be handicapped accessible and secured with 24/7 motion and alarm systems. The details of this location will be determined after approval of this site, and will be submitted with the initial license application.



- 8. Description of the proposed telepharmacy practice including days and hours of operation and the remote pharmacy site's anticipated opening date**

Please see Appendix A for the description of the telepharmacy practice. The anticipated opening date will be June, 2016.

- 9. Policies & Procedures for the telepharmacy service**

Please see Appendix B for the Telepharmacy Policies & Procedures

10. Proposed staffing, identifying all individuals/positions involved with the telepharmacy service from the managing pharmacy and the remote pharmacy site, and including the responsibilities of each staff member

- a. **All technicians practicing at the remote pharmacy site must be nationally certified and registered with the Board**
- b. **All technicians practicing at the remote pharmacy site must have a minimum one year of Iowa pharmacy practice as a pharmacy technician**

The proposed staffing will be determined after approval of this site, and will be submitted with the initial license application. Our target technician will have 5+ years of experience. Prior to opening the technician will work in an established telepharmacy for training.

11. Plan for training personnel practicing at managing pharmacy and remote pharmacy site

The personnel which will oversee the remote pharmacy site from the managing pharmacy all have experience working with the remote pharmacy sites currently operating in Iowa.

The technicians hired to work at the remote pharmacy site will train in an operating telepharmacy during the month prior to starting at the remote pharmacy site. They will be trained according to best practices and standard operating procedures developed at these locations.

12. Identification and description of technology and communication systems to be used between the managing pharmacy and the remote pharmacy site

EnterpriseRx dispensing and Point-Of-Sale system will be used for general operations. The telepharmacy software for remote verification and patient counseling will be provided by TelePharm. EnterpriseRx has been chosen because of the 2-way interface between TelePharm and EnterpriseRx. The data between both systems will have an identical patient database that can be accessed in both sites in real-time. Technicians and Pharmacists both have unique username and passwords with specific roles. For example a pharmacist will have every patient's full profile readily available from any remote dispensing site which they are assigned to oversee.

- a. **Type of audio-visual link and communication will be utilized between the managing pharmacy and the remote pharmacy site**

The audio-visual link that will be utilized is a HIPAA-compliant peer-to-peer secure HD video conferencing protocol utilized in TelePharm's technology platform. This technology is in over 100 pharmacies in 8 different states with 100% success rate of pharmacies operating.

- b. **Will the link between the managing pharmacy and the remote pharmacy site be a constant, live, or real-time connection; if not, how and when will the link be activated; will the pharmacist be able to open a visual or audio link from the managing pharmacy without the assistance or interaction of the remote pharmacy site personnel**

There will be a live camera feed showing an overview of the pharmacy and the operations which will be readily available by the pharmacist at all times. They will be able to open this link from the managing pharmacy without the assistance or interaction of staff at the remote pharmacy site. In addition, a real-time connection will be made on demand between the pharmacist and patients, as well as technicians. This link can be initiated by pharmacists, technicians, or patients.

c. Will multiple camera views be available from the remote pharmacy site; who controls the camera views

Yes, multiple camera views will be available. The pharmacist at the managing pharmacy can control these camera views. Every part inside the pharmacy will be viewable from the cameras.

d. Will bar-code technology be utilized; if so, how and by whom

Yes, there will be two different bar-code technologies utilized at the telepharmacy:

1. Each prescription has a bar-code which needs to be scanned to open the prescription and begin the filling process
2. The NDC on the stock bottle will need to be scanned prior to filling the prescription
3. Each person who accesses TelePharm's system will have a unique user-id and password. Every action within the TelePharm system is tracked from opening a prescription record, capturing images and initiating counsel sessions.

13. Drug and record security and confidentiality at the remote pharmacy site

All employees will receive additional training pertaining to drug and record security and confidentiality. Additional areas of focus will include patient privacy, FWA, and cultural competency. Data will be transmitted through a HIPAA-compliant secure HTTPS connection to our data servers and stored using 256-bit AES encryption. Standard operating procedures will also be implemented to ensure drug and record security and confidentiality.

14. Record-keeping systems and location

a. Type of electronic/digital record-keeping system with the remote pharmacy site utilize for tracking and recording of dispensing activities and telepharmacy communications

b. Length of time that recorded data will be retained

Enterprise RX software will be utilized for record-keeping to track and record dispensing activities. The Enterprise RX system has a two-way integration into the telepharmacy system provided by TelePharm. Telepharmacy communications will be tracked and recorded through TelePharm software. Recorded data will be retained for a minimum of 10 years. All data and audit logs are readily available and our mirrored databases within both systems to the managing pharmacy.

15. Drug inventory and control

a. Will the remote pharmacy site maintain a stock supply of prescription drugs

Yes, the remote pharmacy site will maintain a limited stock supply of prescription drugs. The specific formulary for this location will be determined based on the need of the patients in the community.

b. Will the remote pharmacy site stock and dispense controlled substances; if so, where and how will controlled substance stock be maintained

Yes, the remote pharmacy site will maintain a limited supply of controlled substances. The specific formulary for this location will be determined based on the needs of the patients in the community. Controlled substance stock class 3-5 will be dispersed throughout the regular inventory, and will be checked bi-annually through inventory. Ordering trends will be monitored from the corporate office. CII drugs will only be ordered and stored on a requested basis by the local clinics/physician. CII drugs will be kept in a locked, secure location and a perpetual inventory will be kept and inspected on at least a monthly basis.

c. How will drugs be packaged for dispensing to the patient and who will package and label the patient's prescription

All prescriptions will be packaged and labeled by the certified pharmacy technicians working on-site at the remote pharmacy site. They will only be dispensed to the patient after they are verified by the pharmacist.

d. How often will noncontrolled prescription drugs be inventoried and by whom

The pharmacist will inventory the noncontrolled prescription drugs perpetually with software, and will conduct a manual inventory bi-annually.

e. How often will controlled substances be inventoried and by whom (suggest pharmacist in charge or pharmacist designated by pharmacist in charge)

The Pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge will ensure controlled substance inventory counts are recorded. Class 3-5 controlled substances will be monitored perpetually in the software, and reconciled bi-annually. CII inventory will be monitored perpetually in the software and will be reconciled at least once monthly.

f. If a perpetual inventory for controlled substances is utilized, who will reconcile the perpetual inventory to the physical inventory and how frequently (suggests monthly reconciliation by pharmacist in charge or pharmacist designated by pharmacist in charge)

Perpetual inventory will be utilized for controlled substances located at the remote site. Class 3-5 controlled substances will be reconciled biannually by the pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge. For Class 2 controlled substances, the pharmacist in charge of the telepharmacy or a pharmacist designated by the pharmacist in charge will reconcile the CII inventory at least monthly.

16. Scope of clinical pharmacy services to be provided at remote pharmacy site and who will provide those services

A comprehensive guide of services will be provided on-site, and tailored to the community's needs based on dialogue and relationships with the local prescribers and other healthcare providers. These services may include but are not limited to:

1. Medication Therapy Management
2. Comprehensive Medication review
3. Immunizations
4. Drug/Disease state education
5. Respiratory therapy
6. Durable medical equipment
7. Direct video link into clinic for clinical pharmacy services
8. Point-of-care testing with pharmacist on-site
9. Medication Synchronization

17. Continuous quality improvement plan and how it will be implemented and utilized

The pharmacists on duty for telepharmacy and the technician at the telepharmacy will be responsible for recording Continuous Quality Improvement (CQI) data to include metrics such as consultation and error rates. The staff will also utilize third party reporting for quality events. CQI events will be monitored from the corporate level to determine adjustments to best practices in order to prevent further occurrences.

18. System downtime plan and procedures

The telepharmacy cannot operate if the audio / visual link cannot be established and no prescriptions may be filled or dispensed. All dispensing activities will halt until the audio / visual link can be re-established. A cellular backup connection will be evaluated depending on the speed and reliability.

19. Processes for ensuring safety and security of patients and staff

Disaster preparedness plans will be included in the training for pharmacy staff. These plans include processes to ensure the safety and security of patients and staff. Additionally, cameras will be placed throughout the store.

20. Patient counseling process including plans to ensure security of patient information and privacy for discussions with patients

Managing Pharmacy will install telepharmacy audio / visual equipment from TelePharm. This equipment will provide an audio / visual link between the managing and remote location and also allow for HIPAA compliant counseling of patients. Patient counseling will be required and enforced with Telepharm software, compliant with Iowa consultation laws.

21. How toll-free telephone service will be provided and available to patients for direct contact with the managing pharmacy

Signs will be placed throughout the store alerting customers how to contact the managing pharmacy. Additionally, a pharmacist will always be available at the managing pharmacy through the TelePharm software to communicate with patients. Any calls coming into the remote pharmacy can easily be transferred directly to the pharmacist.

22. Schedule and process for periodic inspection of remote pharmacy site

a. How often will a pharmacist from the managing pharmacy inspect the remote pharmacy site

A pharmacist from the managing pharmacy will inspect the remote pharmacy site at least once per month.

b. What will be included in periodic inspection at the remote pharmacy site and who will conduct the inspection

Please see Appendix C for the monthly inspection checklist which will be conducted by a pharmacist from the managing pharmacy.

c. What will be the process to address discrepancies

Discrepancies will be followed with an immediate action plan to resolve and prevent further discrepancies. All reporting from each inspection will be reported to the corporate office for further evaluation.

23. Identification of information and data that will be provided in periodic reports to the Board

The telepharmacy site will provide the Board with periodic reports including, but not limited to, the following information:

- Documented information regarding specific pharmaceutical services provided to patients at the remote pharmacy site
- Number of prescriptions dispensed from the remote pharmacy site
- Number of prescriptions which came directly from the local clinic
- Identification of errors in dispensing from the remote pharmacy site by type of error and actions taken to resolve and prevent future errors by type
- Information regarding interactions with prescribers and community outreach efforts to patients and prescribers
- Successful counseling rate at the remote pharmacy site including comparison with counseling rate at the managing pharmacy
- Number of hours a pharmacist was physically present at the remote pharmacy site
- Number of hours the remote pharmacy site was open for business
- Plans for future onsite pharmacist staffing and criteria used to determine the need for onsite pharmacist staffing
- Patient surveys on satisfaction and care received

24. Specific identification of “technician in charge” – include qualifications

The “technician in charge” at the telepharmacy will be determined after approval of this site, and will be submitted with the initial license application.

25. Prohibit the OTC sale of controlled substances from remote pharmacy site when the pharmacist is not physically on-site

No OTC controlled substances will be sold from the remote pharmacy site when the pharmacist is not physically on-site.

26. Prohibit a pharmacist intern from practicing at the remote pharmacy site unless a qualified pharmacist is physically present at the remote site to supervise the pharmacist intern

Pharmacist interns will not be allowed to practice at the remote pharmacy site unless a qualified pharmacist is physically present at the remote site.

Appendix A: Description of the Telepharmacy Practice

This location will be implemented according to a proven template for telepharmacy operations that has been used in the current telepharmacy sites, specifically the Zearing and State Center locations. The pharmacist will be on site for face-to-face interactions with patients at least one day per month.

- The pharmacist will be physically located at the Managing Pharmacy and will be readily available to the technicians and patients at the Telepharmacy Site at all times. The pharmacist will continue to have ultimate authority over the dispensing process.
- The prescription department will be staffed by certified pharmacy technicians. The pharmacist-technician relationship will remain important as the pharmacist will utilize new technologies and the leadership of head technicians to maintain safety protocols for patients.
- All pharmacy technicians working at the telepharmacy site will be required to obtain and maintain current Certified Pharmacy Technician (CPhT) status through the Pharmacy Technician Certification Board (PTCB). They will also be required to have the following:
 - Minimum of two years experience working in an Iowa pharmacy
 - Must adhere to all other rules and regulations set forth by the Iowa Board of Pharmacy
- Technicians will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules
- Prescriptions will be filled according to all the standard operating procedures of a pharmacy. As the technician is filling the prescription, they will capture images of all steps which require pharmacist verification to provide to the verifying pharmacist. These images, along with any other documentation, will be sent to the pharmacist to verify the dispensing and clinical accuracy of the prescription. The prescription must be verified by the pharmacist before it is able to be dispensed to the patient.
- All of the information about the prescriptions filled at the Telepharmacy will be recorded and maintained in secure records with redundant backups for 10 years. This audit trail is readily available for any prescription processed at the Telepharmacy.
- A supervisor will travel to the Telepharmacy site once per week for the first month of operation to ensure policies and procedures are being followed.
- A pharmacist will travel to the Telepharmacy at least one time per month to perform a detailed inspection at the site and have face-to-face time with patients. While the pharmacist is on site, (s)he will verify all policies and procedures are being properly followed. When a pharmacist is not available on site, all verification and counseling will be provided by an Iowa licensed pharmacist.

- Medication counseling and responding to patient questions will be completed through a secure video connection in a private area when the medications are dispensed to the patient. Pharmacists will be readily available for consultation with patients, prescribers, and other care providers through a secure video connection. All patients will be required to review prescription information that includes side effects and warnings prior to the counseling session. All new prescriptions will require pharmacist counseling.

An Iowa licensed pharmacist at the managing pharmacy will remotely verify prescriptions and counsel patients. The pharmacist will be on site to visit each telepharmacy at least monthly, and pharmacist presence will increase as patient growth allows in order to maximize the in-person pharmacist-patient relationship.

Experienced Certified Pharmacy Technicians (CPhT) will be hired to work at the telepharmacy. There will be at least 1 technician staffing the location daily, with an additional technician on call as needed. Every effort will be made to hire technicians who reside in or around the community for ease of commute and connection to the community.

The telepharmacy will initially have approximate hours from 9:00am - 5:00pm Monday through Friday with variations depending on specific community need. Evening hours as well as Saturday hours will be considered.

Appendix B: Telepharmacy Policies & Procedures

POLICIES

1. Managing Pharmacy will operate and maintain a local telepharmacy that will provide access to critical pharmacy services to the community.
2. Managing Pharmacy will ensure that all Iowa Board of Pharmacy telepharmacy rules (Chapter 9) are followed while operating as a telepharmacy, with the exception of the waiver of the AMDS requirement
3. Managing Pharmacy will ensure that available technology is utilized in the operation of the telepharmacy location to protect the health and safety of all patients.
4. All Managing Pharmacy Operational Policies and Procedures will apply to the telepharmacy unless contradicted by the specific telepharmacy procedures as described in this section.
5. All pharmacy technicians working at the telepharmacy sites will be required to obtain and maintain current Certified Pharmacy Technician (CPhT) status through the Pharmacy Technician Certification Board (PTCB). They will also be required to have the following:
 - a. Minimum of one year experience working in an Iowa pharmacy
 - b. Training in a telepharmacy setting before beginning at the remote pharmacy site
 - c. Must adhere to all other rules and regulations set forth by the Iowa Board of Pharmacy
6. Technicians will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules
7. Technicians will be responsible for recording Continuous Quality Improvement data to include metrics such as consultation and error rates.

PROCEDURES

1. Pharmacy Overview
 - a. Managing Pharmacy will maintain a licensed community pharmacy.
 - b. The Pharmacist in Charge (PIC) in the community will be responsible for the oversight and operation of the telepharmacy. The PIC will be a pharmacist from the Managing Pharmacy location that has been previously trained on telepharmacy policies and procedures.
2. Personnel Responsibilities
 - a. The PIC will be responsible for the oversight of the telepharmacy operation. The PIC will develop and maintain the Operational Policies and Procedures of the telepharmacy and is responsible for training the staff of the telepharmacy and the managing pharmacists in the legal and safe operation of the telepharmacy.

- b. While operating as a telepharmacy, the pharmacy will be staffed with a Certified Pharmacy Technician at all times. The CPhT will be responsible for all technical functions performed at the telepharmacy. The technician will not perform any roles requiring the professional judgment of the pharmacist as described in Iowa Board of Pharmacy Rules.
 - c. The current pharmacist on duty for telepharmacy will be responsible for ensuring the accuracy and validity of all prescriptions dispensed by the telepharmacy. The pharmacist will also be responsible for providing counseling to all patients at the telepharmacy for new prescriptions and as requested for refill prescriptions, OTC medications, or other health information questions.
 - d. The pharmacists on duty for telepharmacy and the technician at the telepharmacy will be responsible for recording Continuous Quality Improvement data to include metrics such as consultation and error rates.
 - e. The PIC of the telepharmacy will ensure monthly controlled substance inventory counts are recorded.
3. Technology Safeguards
- a. Managing Pharmacy will install telepharmacy audio / visual equipment from TelePharm. This equipment will provide an audio / visual link between the managing and remote location and also allow for HIPAA compliant counseling of patients. The telepharmacy cannot operate as a telepharmacy if the audio / visual link cannot be established and no prescriptions may be filled or dispensed.
 - b. The technician at the telepharmacy site will utilize barcode technology and the Tech Check module in the dispensing software to verify the products of all prescriptions filled.
 - c. The telepharmacist on duty at will use the audio / visual link to check the hard copy of new prescriptions, the prescription label, and the contents of the package. The pharmacist will be responsible for the accuracy and validity of the finished prescription product and marking it as complete in the TelePharm software.

Appendix C: Pharmacist Monthly Inspection Checklist

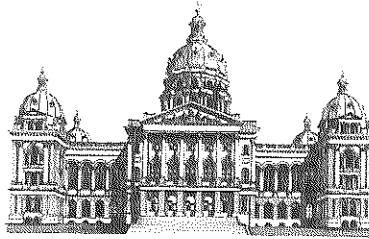
Telepharmacy Site _____ Day/Time of Visit _____

Inspected By _____

| | Checklist Item | Y/N | Comments |
|----|---|-----|----------|
| 1 | Is a notice conspicuously displayed on the registered pharmacy premises detailing the name and registration number of the responsible pharmacist and the fact that a pharmacist is accessible for consultation at any time? | | |
| 2 | Are pharmacy technicians following proper Consultation procedure? | | |
| 3 | Audit 20 filled prescriptions, are they accurate? | | |
| 4 | Audit 10 hard copies, is proper documentation being observed | | |
| 5 | Observe technicians filling a prescription, are proper SOP being followed? | | |
| 6 | Are customers greeted immediately upon entry? | | |
| 7 | Are proper inventory control SOP being followed? | | |
| 8 | Check 10 shelf bottles on shelf, are any of them expired? | | |
| 9 | Are all staff in clean and proper uniforms and nametags are prominently visible? | | |
| 10 | Is the CII cabinet locked and the key stored appropriately? | | |
| 11 | Are patient required references in clear view? | | |
| 12 | Is the filling area clear and uncluttered? | | |
| 13 | Is the store area clear and uncluttered? | | |
| 14 | Walk the perimeter, are there any concerns? | | |
| 15 | Are the bathrooms clean and tended to? | | |

AMANDA RAGAN
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The Senate
State of Iowa
Eighty-sixth General Assembly
STATEHOUSE
Des Moines, IA 50319

ASSISTANT MAJORITY LEADER

COMMITTEES

Agriculture, *Vice Chair*
Appropriations
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Natural Resources and Environment
Rules and Administration
Veterans Affairs

Health and Human Services Appropriations
Subcommittee, *Chair*

September 18, 2015

TO WHOM IT MAY CONCERN:

The purpose of this letter is to express my personal support for the proposal to open a tele-pharmacy facility in Nora Springs, Iowa. I believe this is an outstanding idea which will have tremendous benefits for that community and the surrounding area.

As a state senator, I have been privileged to serve on the Senate Human Resources Committee since my first election to the legislature. During that time I have been a strong advocate for increasing health care facilities and access to health care throughout Iowa, especially in our rural regions. A tele-pharmacy facility in Nora Springs would be a great help to the citizens who live there. Even though the closest pharmacy is only 10 miles away in Mason City, that 20 mile round trip can prove daunting for people with mobility issues, disabilities, or the elderly who may be homebound or have problems with transportation.

It was my honor to represent Nora Springs and the surrounding Floyd County for a decade. Bringing access to life-giving prescriptions closer to home is a most positive development for that town and should be encouraged and supported at every level of government and regulation. I applaud those who are taking the initiative to make this proposal a reality.

Sincerely,

A handwritten signature in cursive script that reads "Amanda Ragan".

Senator Amanda Ragan

Todd Prichard
STATE REPRESENTATIVE
Fifty-Second District
Statehouse: (515) 281-3221
e-mail – todd.prichard@legis.iowa.gov

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House of Representatives
State of Iowa
Eighty-Fifth General Assembly
STATEHOUSE
Des Moines, Iowa 50319

COMMITTEES
Agriculture
State Government
Ways and Means

APPROPRIATIONS SUBCOMMITTEE
Justice System

September 22, 2015

Iowa Board of Pharmacy

Re: Telepharmacy, Nora Springs, Iowa

Dear Board of Pharmacy Member:

I respectfully request that the Board of Pharmacy approve the request for a telepharmacy in Nora Springs, Iowa. As the State Representative for Nora Springs, I know that locating a telepharmacy in Nora Springs will greatly benefit this small rural community.

Nora Springs is located in rural North Iowa and currently without a local pharmacy. Residents of Nora Springs currently have to drive 10-15 miles to access a pharmacy. For elderly residents, the distance to a pharmacy is burdensome. Further, the lack of critical services, such as a pharmacy, greatly decrease the quality of living and attractiveness of a community.

For the above stated reasons, I urge the Board of Pharmacy to approve Nora Springs' request for a telepharmacy.

Sincerely,

A handwritten signature in black ink that reads "Todd Prichard".

Todd Prichard
Iowa House of Representatives
House District 52



809 Clark Street
P.O. Box 577
Charles City, IA 50616
1stsecuritybank.com

August 5, 2015

Telepharm
105 Iowa Ave, # 231
Iowa City, IA 52240

RE: Telepharm Project – Nora Springs, IA

To whom it may concern:

My name is Randy Hassman, a 23 year resident of Nora Springs and the Market President of First Security Bank Charles City, IA. My office is located in Nora Springs and I oversee 9 of First Security's 15 Branch Offices. In addition to the Nora Springs branch, I am also responsible for branches in the nearby communities of Rudd and Rockford. All of these communities would benefit from a new pharmacy in Nora Springs.

As the local banker, I am very invested in the success of our small towns. The possibility of a pharmacy locating in Nora Springs is very exciting and a project I fully support. I strongly feel a pharmacy would be successful and a needed asset to our community and surrounding area. While our local medical clinic and care center provide service to a sizable number of our citizens, a drive to either Mason City or Charles City is necessary to fill prescriptions. This can be increasingly difficult on our elderly citizens.

I have spoken to several area residents about the possibility of a new pharmacy in town and I have received favorable feedback from everyone I have talked to. This has generated a very positive 'buzz' in our town and the surrounding area. There is a strong desire for this to come to fruition.

In closing, please know that I will advocate for the pharmacy in Nora Springs. I would be happy to do anything I can do to assist in this project. Please feel free to contact me with any questions, comments or requests. Thank you for your consideration of Nora Springs, Iowa.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Hassman".

Randy Hassman, Market President
P O Box 306
Nora Springs, IA 50458
641-749-5356
rhassman@1stsecuritybank.com

Aredale Charles City Dumont Ionia Manly Marble Rock Meservey
Nora Springs Riceville Rockford Rockwell Rudd Swaledale Thornton
Member FDIC

To: Telepharm

105 Iowa Ave., #231

Iowa City, IA 52240

Re: Telepharm Project

Location: Nora Springs, Iowa

To: Whom It May Concern,

My name is Dale Lipp I grew up and graduated from Nora Springs, moved to Colorado for 7 years and moved my family back to my hometown. I have owned my business North Iowa Builders for 23 years.

I think bringing in a pharmacy would be a great benefit, not only to our town but surrounding towns as well. Having a pharmacy in town would also bring people into our town and potentially open up the window for other businesses to open. We are bedroom community to Mason City, Iowa and have a lot of volume of cars passing thru to go to Mason.

Our downtown has gone thru some major changes with fires and closings and there are a few trying to revive the downtown. I along with others feel the city council does not want to make changes because they are comfortable and do not like change. However we have many new young families who want to stay here and see our community grow. We are in the process of building a new aquatic center which will bring many people thru our town.

Some of the concerns with citizens is how this is going to be handled with all the different insurance companies. But overall everyone is excited to see this happen and would like to see not just prescriptions but other health products available.

Sincerely,

Dale Lipp

Spring Harbor

Residential Services

111 South Boulder

Nora Springs Iowa 50458

Phone 641-749-5372 Fax 641-749-2630

TO: TELEPHARM
105 Iowa Ave., #231
Iowa City, IA 52240

RE: Telepharm Project for Nora Springs, Ia

To Whom It May Concern:

Hello. My name is Simone Schmitt and I am the Executive Director of a residential care facility, Spring Harbor Res Srvc, in Nora Springs. I have worked at this facility since 1999 and been a part of the Nora Springs community. We serve a group of individuals who are from age 18 to 78 yrs old and have Chronic Mental Illness, Intellectual Disabilities, Dual Diagnosis and some physical disabilities as well.

I was thrilled when I heard of the prospect of a pharmacy in our small community. How wonderful for the elderly in our community, the disabled individuals who have such difficulty securing transportation out of town and how convenient for our facility and that of the nursing facility and assisted living as well. It would be a great resource for the town and the surrounding smaller towns that are 5-12 miles away.

We currently are fortunate enough to have a long-term pharmacy that delivers our medications and our medication record/administration sheets, however having the pharmacy local would be very enticing and great for our clients getting ready to move into their own homes in the community as well.

Thank You for the opportunity to share in this exciting venture.

Sincerely,



Simone Schmitt, LPN
Executive Director



3223 4th St. SW
Mason City, IA 50401
641.424.6461

24 S. Hawkeye
Nora Springs, IA 50458
641.749.5430

Professional care and Personal service for all ages!

Telepharm

10 S. Iowa Ave, #231

Iowa City, IA 52240

RE: Telepharm Project

Location: Nora Springs, Iowa

To Whom it may Concern:



We are Nora Springs Family Dentistry and have been practicing in Nora Springs since 2009. We occupy an office built by Dr. David Miller many years ago.

We are excited to hear that a pharmacy may open across the street from us. The majority of our patients live in Nora Springs, but we treat patients from Rockford, Osage, St. Ansgar and also Mason City.

We feel that a new business here on Hawkeye Avenue in Nora Springs would be welcomed by the Nora Springs community. A pharmacy here would be of great benefit and convenience to our patients.

Best Wishes with your endeavor.

Sincerely,

Dr. Timothy J. Weber

Dr. Michael D. Otto

TIMOTHY J. WEBER, DDS | MICHAEL D. OTTO, DDS

www.familydentistrymc.com



EAGLE FAMILY HEALTH

Lisa M. Kies, MD

903 W. Congress, PO Box 729
Nora Springs, IA 50458

August 7, 2015

Telepharm
105 Iowa Ave #231
Iowa City, IA 52240

To Whom It May Concern:

My name is Dr. Lisa Kies, MD, and I have been the sole practitioner and owner of the only medical office here in Nora Springs since I purchased it in 2008 from Dr. Patrick Ryal, who had practiced here for some 15 years before leaving to be a medical missionary.

I am delighted at the possibility of having a pharmacy here in town. It is a significant handicap to many of my patients with limited means or ability to drive to the next town. It'll also be a convenience for parents of sick children who need antibiotics sooner rather than later.

I've looked into having some sort of pharmacy option here in the office myself with medical vending machine companies, but nothing they offered suited our purposes. I would anticipate sending a large number of prescriptions from this office to any pharmacy here in town. Currently, the closest pharmacies are about 10 miles away, and there would be a large area to the east of town that would probably start getting prescriptions here rather than driving on further to Mason City.

Everyone I've mentioned this ~~to~~ possibility to has been very excited about the idea of having a local pharmacy in Nora Springs.

So, I am wholeheartedly in support of having a pharmacy here in Nora Springs to compliment my medical practice here.

Sincerely,

Lisa M. Kies, MD

LMK/jtb

Nora Springs Insurance

805 W Congress
PO Box 248
Nora Springs, IA 50458
Phone: (641)749-2505
Fax: (641)749-2521
office@NoraSpringsIns.com
NoraSpringsIns.com



Century 21 Preferred

2800 4th St SW
Suite 3
Mason City, IA 50401
Phone: (641)424-9400
Cell: (641)430-0123
MarkDix@Century21.com
MarkDixRealtor.com

Sirs,

I am Mark Dix owner of the Nora Springs Insurance Agency and an Associate Broker with Century 21 Preferred. I live in Nora Springs and operate my business from this community. I have been part of this community for 20 years and am very excited for the possibility for a new business coming to town.

A new pharmacy at the corner of Hawkeye and Congress will be a cornerstone for new businesses in this town. It will enhance the business district and provide a valuable service to the members of our community. Currently there are no options for purchasing pharmaceutical goods and our only option is traveling to Mason City.

The town is abuzz with excitement over the possibility of having a pharmacy in town. The location is perfect, visible from the highway and it will enhance the restaurant business located to the south. The restaurant draws from a large geographical area so they will help perpetuate the pharmaceutical business.

Sincerely

Mark Dix



TOWN & COUNTRY INSURANCE AGENCY

30 North Hawkeye Ave Nora Spring, IA 50458

Phone: 641-749-5341 FAX: 641-749-5343

August 5, 2015

**Telepharm
105 Iowa Ave., #231
Iowa City, IA 52240**

**Re: Telepharm Project
Location: Nora Springs, IA**

To Whom It May Concern,

As a local independent insurance agency servicing Nora Springs and the surrounding area we welcome the news you are considering our town as a location for your pharmacy.

We value the people and way of life in small town America and support opportunities that improve the convenience and quality of life for our citizens. Your pharmacy will go a long way in this regard as many of your citizens have to travel a good distance to access pharmacy services and products.

We wholeheartedly support your endeavor and encourage you to choose Nora Springs.

Sincerely,



**Spencer Potter
Town & Country Insurance**

August 5, 2015

Telepharm
105 Iowa Ave #231
Iowa City, IA 52240

Re: Telepharm Project
Location: Nora Springs, Iowa

To Whom It May Concern:

I am Maritz Nel, owner of a restaurant and lounge in Nora Springs. I previously owned the Elephant Keg and restaurant from 2005 – 2011 when the building burned down due to a faulty furnace in the connecting building next to me. I then opened another establishment in a neighboring community for about a year until my current location opened up for sale back in Nora Springs. I have been here for 2 years now in my current restaurant called Maritz's Ekeg.

I have lived in this community for about 15 years, my wife has lived here for over 30 years. Needless to say we like it here. We have a group of younger adults who are very active in the community. They have worked very hard to get grants and donations to improve the city and have succeeded in getting a new pool built.

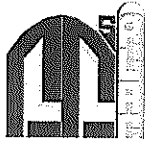
I think a pharmacy in town would be a wonderful addition. The people I've spoken to about the possibility of a pharmacy moving to town thought it was a wonderful idea. I think it would draw in people from neighboring communities also which would benefit all of us with businesses in town and might even draw more businesses to open up shop here.

Currently we have to go to Mason City to pick up prescriptions which isn't very convenient when you are ill or hurting and just want to go home and rest but now have to drive 15 or more miles away to fill your prescription or wait for someone else to pick them up which might be hours later.

Sincerely,



Maritz Nel, owner Maritz's Ekeg Restaurant and Lounge



15 South Hawkeye Nora Springs Iowa 50458
641-749-2577

To: Telepharm

105 Iowa Ave #231

Iowa City, IA 52240

Re: Telepharm Project

Location: Nora Springs, IA

To: Whom It May Concerns,

My Name is Karla Gordon owner of GG's Place LLC in Nora springs Iowa located downtown of Nora Springs Iowa. Recently I have established a new restaurant in downtown Nora Springs showing positive support from this community. GG's is a restaurant that has large cliental of elderly and young family with growing potential to other communities. My family and I picked this location do a large population drive through the town to go to work either in Mason City or Charles City. I myself as a former Nurse traveled and was tired and looking for a good place to eat in the area instead of traveling to Mason City. I have been living in the rural community since 2011 with my husband and children and really have enjoyed the friendly safe community to raise our last child of 2 years old.

As a resent nurse I feel having a pharmacy is this town is very vital for the dearly as well as the young and myself. Watching my own clients most of the go to the post office stop by have a roll and then go to town to get there meds or see a doctor. Mostly for the elder I have deliver meals to them and comments of it is hard to pay or find transportation to get to mason is very hard. By having is pharmacy it give a relief to our community and strongly belief that this with not just benefit the community but to us business owners. Example of my cliental base for Saturday I sold 85 breakfast buffet meals and that night 58 buffet meals. That would benefit your business and I would have strong support do to it is very hard for me to get to town to get my medication so a prime example again is that I went without my meds for couple of days till I had a chance to get them.

I would like to extend my support and feel free to contact me with any questions.

Karla Gordon



TECHNOLOGY CAN BE DIFFICULT

We're here to help.

p: (641) 749-2531



P.O. Box 518 | 608 East Congress

Nora Springs, IA 50458

August 3, 2015

To: Telepharm
105 Iowa Ave., #231
Iowa City, IA 52240

Re: Telepharm Project
Location: Nora Springs, Iowa

To: Whom It May Concern,

Having served the North Iowa area with technology for over 100 years and as the CEO of OmniTel Communications with its principle place of business located in Nora Springs, Iowa, I have seen the dwindling main streets of our downtown communities. The citizens in the towns and rural areas we serve deserve access to economic development as well as modern health care and *Telepharm* can go a long way in providing both.

For any new business to locate in a community it is truly exciting and a real addition to the economic wellbeing of an area. The addition of *Telepharm* is just as exciting and an incredible asset to the area's population wellbeing. This addition would save time and effort in obtaining prescriptions and help to ensure the population's health when in need of medicine all of which helps to sustain a better quality of life.

Nora Springs is a tightknit, local focused community of hardworking people. Easier access to prescriptions and other health care needs will be essential to grow the lifespan of the community and help to provide the basis for additional economic growth all around. Becoming a local member of the community would advance the use of technology and help to connect the small communities we serve to the entire world and its global economy. After meeting with Nora Springs' community leaders and talking with the citizen's group involved in this project, OmniTel found it incredibly important to do all it can to promote the success of this endeavor.

Please see this letter for the reasons it was written, the support of better health, economic development and quality lifestyles of the people who live, work and play in our rural areas of Iowa. I appreciate your time and any considerations you give towards helping to ensure success in bringing *Telepharm* to Nora Springs and all of rural Iowa.

Sincerely,

Ronald Laudner
CEO
OmniTel Communications
641-749-2531
rlaudner@omnitel.biz

OmniTel.biz



City of Nora Springs

45 N. Hawkeye • P.O. Box 336 • Nora Springs, IA 50458

Telepharm
105 Iowa Ave., #231
Iowa City, IA 52240

Re: Telepharm Project in Nora Springs, Iowa

To Whom It May Concern,

My name is Deborah Gaul and I have been a member of this community since 2002. I serve the community as the city administrator here in Nora Springs.

I am very excited about the possible opportunity our community may have with you bringing in your pharmacy. I feel that Telepharm would be very beneficial and enhance our healthcare needs. As you are aware, having our doctor's office, a dental office, and nursing home in the community; the pharmacy would be a very viable addition.

With the closest pharmacy approximately 9 miles away, many members of the community would have a direct access to a pharmacy upon leaving our local medical facilities. Another benefit that I could see would be to our surrounding communities. They too would benefit after leaving even the medical facilities in the surrounding towns. The pharmacy could be as close as 4 or 6 miles versus 14 to 16 or more miles for these outlying communities today.

I am looking forward to your company becoming a part of our wonderful community.

Sincerely yours,

A handwritten signature in cursive script that reads "Deborah Gaul".

Deborah Gaul
City Administrator

September 13th, 2015

Iowa Board of Pharmacy

Re: Telepharmacy State Center, Iowa

Dear Iowa Board of Pharmacy:

I respectfully request that your board approve the request for a telepharmacy in Nora Springs, Iowa. I personally live in the Omnitel Communications service area as well as represent multiple constituents who will benefit from this delivery mechanism. Nora Springs is a rural community that has been trying to find a way to have a pharmacy in the community.

My mother was one of the first pharmacy technicians to be part of a telepharmacy in LeRoy, MN. It was a wildly successful endeavor for that clinic and community. I have seen first-hand, through my mom, the benefits this partnership will bring to the residents of Nora Springs.

Omnitel Communications is the right company to have in this partnership as they have a strong track record of helping out their rural constituents. A few years back Omnitel Communications made the investment to bring fiber to the rural residents of their district. Not only have they brought our region into the global marketplace, but they have been a strong supporter of educational initiatives throughout their service area. Truly a first-rate company.

I know that the local communities and clinics support this proposal for a pharmacy to provide those services locally and quickly. My wife is in family practice within this service area and fully supports this initiative as it will provide her patients with better services and care.

Thank you for your consideration and time.

Joshua J. Byrnes

House District 51

Winneshiek, Howard, Mitchell, Worth