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California Board of Pharmacy and CDC Highlight Importance of PPE and Safe Practices to Protect Pharmacy Staff and Public During the COVID-19 Pandemic

Personal protective equipment (“PPE”) has become a hot topic due to the COVID-19 pandemic, both among the public at large and those in the medical community. California pharmacies, pharmacists and pharmacy staff should be particularly aware of the need for PPE, both to protect the health of pharmacy staff and the public at large.

Following Governor Gavin Newsom’s declaration of a state-wide emergency and the national declaration of emergency, the California Board of Pharmacy (“Board”) issued [temporary measures](#) (effective through July 2020) somewhat loosening the guidelines for the use of PPE *during sterile compounding* (Title 16, California Code of Regulations, section 1751.5; and Business and Prof. Code, section 4126.8). However, on April 9, 2020, the Board issued the following message in response to public comments that some pharmacy personnel may not have appropriate personal protective equipment (“PPE”) to safely provide health care and related services during the COVID-19 pandemic and to help avoid contracting and transmitting the virus when interacting with the public and co-workers:

The Board would like to remind pharmacies of their professional obligations to protect both employees and the public from hazards and transmission of diseases.

Department of Industrial Relations (DIR) regulations and California Code of Regulations (C.C.R.), title 8, section 3380 (Personal Protective Devices) require all California employers to conduct a hazard assessment. If COVID-19 is determined to be a workplace hazard, the employer must provide employees with appropriate PPE. In addition, to the extent that a pharmacy is subject to the DIR requirements of C.C.R., title 8, section 5199 (Aerosol Transmissible Diseases), that section explicitly requires provision of PPE.

To protect workers and prevent exposure to the virus, Cal/OSHA has developed interim guidance, educational materials, and model programs and plans. This [information](#) is provided on Cal/OSHA’s website.

The Board’s message highlights the recognized importance of the use of PPE. Indeed, as of April 10, 2020 [residents of Los Angeles](#) will be required to wear a face covering when entering pharmacies and other essential businesses. These times call for everyone to err on the side of caution.

The Center for Disease Control and Prevention (“CDC”) has issued some helpful information for pharmacies during the COVID-19 pandemic. Specifically the CDC provides the [following](#) tips to further protect staff and the public:

Advise staff who are sick to stay home

Pharmacy staff who have fever or respiratory symptoms should [stay home](#) and away from the workplace until they have recovered. Pharmacies should ensure that sick leave policies are flexible, nonpunitive, and consistent with public health guidance and that employees are aware of and understand these policies.

Filling prescriptions

Although the actual process of preparing medications for dispensing is not a direct patient care activity, the other components of medication dispensing such as prescription intake, patient counseling, or patient education may expose pharmacy staff to individuals who may have respiratory illness. In addition to following the CDC's [workplace guidance](#), pharmacy staff should:

- Provide hand sanitizer on counters for use by customers and have sufficient and easy access to soap and water or hand sanitizer for staff.
- Encourage all prescribers to submit prescription orders via telephone or electronically. The pharmacy should develop procedures to avoid handling paper prescriptions, in accordance with appropriate state laws, regulations, or executive orders.
- Filling and dispensing prescriptions does not require use of PPE. After a prescription has been prepared, the packaged medication can be placed on a counter for the customer to retrieve, instead of being directly handed to the customer. Other strategies to limit direct contact with customers include:
 - Avoid handling insurance or benefit cards. Instead, have the customer take a picture of the card for processing or read aloud the information that is needed (in a private location so other customers cannot hear).
 - Avoid touching objects that have been handled by customers. If transfer of items must occur, pharmacy staff should wash their hands afterwards with soap and water for at least 20 seconds or use an alcohol-based hand sanitizer containing at least 60% alcohol. They should always avoid touching their eyes, nose, or mouth with unwashed hands.

Use strategies to minimize close contact between staff and customers and between customers:

- **Use engineering controls** where the customer and pharmacy staff interact, such as the pharmacy counter, to minimize close contact:
 - Minimize physical contact with customers and between customers. Maintain social distancing (6 feet between individuals) for people entering the pharmacy as much as possible. Use signage/barriers and floor markers to instruct waiting customers to remain 6 feet back from the counter, other customer interfaces, and from other customers and pharmacy staff.
 - To shield against droplets from coughs or sneezes, install a section of clear plastic at the customer contact area to provide barrier protection (e.g., Plexiglas type material or clear plastic sheet). Configure with a pass-through opening **at the bottom** of the barrier for people to speak through or share items, if feasible.
 - Frequently clean and disinfect all customer service counters and customer contact areas. Clean and disinfect frequently touched objects and surfaces such as workstations, keyboards, telephones, and doorknobs. To disinfect, use products that meet [EPA's criteria](#) for use against SARS-CoV-2, the virus that causes COVID-19, and are appropriate for the surface .
 - Discontinue the use of magazines and other shared items in pharmacy waiting areas. Ensure that the waiting area is cleaned regularly.

- For pharmacies with a co-located retail clinic, use signs to ask customers who have respiratory symptoms to wait for their appointment in a specific part of the store.
- Promote the use of self-serve checkout registers and clean them frequently. Have hand sanitizer and disinfectant wipes at register locations for use by customers.
- **Use administrative controls** — such as protocols or changes to work practices, policies, or procedures — to keep staff and customers separated:
 - Promote social distancing by diverting as many customers as possible to drive-through windows, curbside pick-up, or home delivery, where feasible.
 - Large, outdoor signage asking customers to use the drive-through window or curbside pick-up can be useful.
 - Include text or automated telephone messages that specifically ask sick customers to stay home and request home delivery or send a well family member or friend to pick up their medicine.
 - Limit the number of customers in the pharmacy at any given time to prevent crowding at the pharmacy counter or checkout areas.
 - Pharmacists who are providing patients with chronic disease management services, medication management services, and other services that do not require face-to-face encounters should make every effort to use telephone, telehealth, or tele-pharmacy strategies.
 - Close self-serve blood pressure units.

If you are not already doing so, all California pharmacies and their pharmacists-in-charge should take heed of the Board's message and the CDC recommendations and ensure that all pharmacy staff members are provided with and use PPE to protect not only the pharmacies' patients but also the pharmacy staff. Should you have any questions regarding your pharmacy's compliance with these new rules and regulations, please reach out to [Klein, Hockel, Iezza & Patel, P.C.](#)