Situation: Walgreen’s has submitted a request for consideration to use a system of lockers on the Microsoft campus in conjunction with a licensed pharmacy they have on the campus.

Background:
The Commission has discussed alternate ways for pharmacies to dispense and deliver prescribed medications to patients. These discussions have included the potential use of self-service dispensing devices, kiosks and lockboxes to dispense and deliver prescribed medications.

The possession, dispensing and delivery of legend drugs must be done by a facility or individual with legal authority to do so (see RCW 69.41.030).

Self-service dispensing devices, kiosks, and lockboxes, are technologies that assists facilities and practitioners to fulfill prescriptions. This technology includes devices that dispense and deliver medications that had been prepackaged and labelled for a specific patient i.e. in a similar manner to a secured will call. It also includes technologies that can receive a prescription electronically, select the prescribed medication, then fill the prescription and affix a label to the container before delivering the medication to the patient.

Previously, the Commission determined these technologies were not permissible under Washington state law (See the Technology & Services Guideline, page 5). Specifically, these technologies would not be able to maintain compliance with a number of current Commission rules that apply to pharmacies that dispense and deliver medications to patients. This includes WAC 246-869-020(1) which requires certain partitions, and the presence of a pharmacist to be physically for the pharmacy to be open.

In addition to the above, for purposes of this SBAR and discussion it is important to note that possession of legend drugs, just like who can dispense, can be found in RCW 69.41.030(1):

(1) It shall be unlawful for any person to sell, deliver, or possess any legend drug except upon the order or prescription … PROVIDED, HOWEVER, That the above provisions shall not apply to sale, delivery, or possession by drug wholesalers or drug manufacturers, or their agents or employees, or to any practitioner acting within the scope of his or her license, or to a common or contract carrier or warehouse operator, or any employee thereof, whose possession of any legend drug is in the usual course of business or employment: PROVIDED FURTHER, That nothing in this chapter or chapter 18.64 RCW shall prevent a family planning clinic that is under contract with the health care authority from selling, delivering, possessing, and dispensing commercially prepackaged oral contraceptives prescribed by authorized, licensed health care practitioners: PROVIDED FURTHER, That nothing in this chapter
prohibits possession or delivery of legend drugs by an authorized collector or other person participating in the operation of a drug take-back program authorized in chapter 69.48 RCW.

Assessment:
The Commission has not discussed the permissibility of the use of lock boxes for the delivery of drugs specifically. The topic has come up in the rule re-write discussions, and staff do think lock boxes would likely be permissible under the new rules.
There must be clear statutory authority for a drug to be placed in a lockbox. As noted above, the Legend Drug Act (RCW 69.41) makes clear that it is unlawful to sell, deliver, or possess any legend drug unless you have authority to do so (RCW 69.41.030(1)).

A pharmacy does have legal authority to possess, sell and deliver legend drugs within the scope of its license (RCW 69.41.030(1) and RCW 69.41.010(17)(b)). The Pharmacists statute (RCW 18.64) determines the scope of a pharmacy license. This statute provides that a pharmacy license is a “license of location” that entitles the owner “to operate such pharmacy at the location specified” (RCW 18.64.043(1)). For hospitals, the “license of location” can be extended to include any individual practitioner’s office or multi-practitioner office that is owned, operated, or under common control of the hospital (RCW 18.64.043)(2)(a)). As a result, lockboxes that are not physically affixed to, or contained within, the “license of location” issued to the pharmacy cannot be used to store medications unless they are separately licensed.

A common carrier or warehouse operator is not restricted by the same “license of location” requirement. Instead, the Legend Drug Act (RCW 69.41) provides the a common carrier or warehouse operator can possess a legend drug as long as the possession is “in the usual course of business or employment” (RCW 69.41.030(1)).
It is likely lockers under the Commission’s current rules would not be permissible, due to licensing issues.

Recommendation:
Staff need guidance from the Commission on either additional research needed on this topic, or whether the Commission determines lockers to be an adequate delivery method for patient specific medications.
Request for Consideration by the Pharmacy Quality Assurance Commission

**NOTICE**

Documents submitted to the Pharmacy Quality Assurance Commission (Commission) are public records, subject to the Public Records Act, chapter 42.56 RCW, and presumptively open to public inspection and copying. The Commission will make meeting materials available for public inspection and copying on the Commission’s website, including records submitted by you concerning your requests for review or approval to the Commission. If you believe any of these records may be exempt from disclosure under RCW 42.56.270(11)* (“Proprietary data, trade secret, or other information that relates to (a) . . . unique methods of conducting business, (b) data unique to [your] product or services”), then do not submit the records. Instead, you may seek a court order protecting those records as authorized in RCW 19.108.020(3), providing notice of the proceeding to the Commission. The materials may be submitted to the Commission in a manner consistent with an order of the court when the legal proceeding has concluded.

<table>
<thead>
<tr>
<th>Requester/Title/Credentials:</th>
<th>Lorri Walmsley, RPh, Director Pharmacy Affairs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact Email/Phone #:</td>
<td><a href="mailto:Lorri.walmsley@walgreens.com">Lorri.walmsley@walgreens.com</a>, 602-214-6618</td>
</tr>
<tr>
<td>Affiliation:</td>
<td>Walgreens</td>
</tr>
</tbody>
</table>

Complete the following fields if this request applies to an active or pending license (includes registration, or certification). If needed, include additional information on separate paper.

| License Name:                  | Walgreen Co. Living Well Health Center        |
| License/site Address:          | 3925 159th Ave. NE, Redmond, WA 98052          |
| License Number:                | PHAR.CF.60278129                               |

What is your preferred date to have your request considered by the Commission:  
1st Date: 12/19-12/20/2019  
2nd Date: First meeting in 2020

What is your expected outcome by the Commission?  
- [X] Action  
- [ ] Information  
- [ ] Follow-up  
- [ ] Report only

Please attach any policies, procedures or other documentation deemed necessary to support his proposal. Visit the commission’s webpage for approved guidelines, review forms or current laws and rules.

This completed form should be no longer than two pages, front to back.

**Situation:** (Briefly describe the current situation. Give a clear, succinct overview of relevant issues)

Requesting a waiver or approval of a demonstration project to allow for the utilization of pharmacy technicians to deliver prescriptions to secure lockers for patients opting into the service for an employer group. The lockers would be located in surrounding buildings within the employers’ campus. Goal is to improve patient health outcomes by allowing for timely and convenient delivery of medications to the employees of this large employer.
Request for Consideration by the Pharmacy Quality Assurance Commission

Background: (Briefly name any laws, rules, or guidelines relevant to the request):
Current RCW 69.41.030 requires the delivery of medications to an offsite location by a common carrier. We wish to utilize employees of Walgreens to deliver the medications to the secure employer lockers to maintain pharmacy control of the products versus using a common carrier for the products and provide expanded access to prescriptions for patients.

Assessment: (If approved, what would be the expected outcome for patient safety? What is the consequence if this request is not approved?)
If not approved, the employees would need to continue to visit the Walgreens employer worksite pharmacy location on campus. There may be a delay in patient care due to limited hours of the worksite pharmacy versus employee availability in the lockers.

Request: (What action(s) are you asking the commission to take? What do you want to happen next?)
Requesting approval of a demonstration project or waiver to allow for this practice until the new rules become effective.
Background –
Microsoft has had an onsite pharmacy since 2011 on its Redmond campus. The pharmacy operates in partnership with an onsite health center to helping employees achieve their best health. The below as goals established by Microsoft.

<table>
<thead>
<tr>
<th>IMPROVED HEALTH OUTCOMES</th>
<th>ENHANCE EMPLOYEE VALUE PROPOSITION</th>
<th>MANAGE HEALTH CARE COSTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Holistic approach with every visit to detect potential health concerns early and make referrals to appropriate programs and services</td>
<td>Onsite services reduce time away from work, which supports productivity and work/life balance</td>
<td>Early detection and timely delivery of care to avoid more costly treatments</td>
</tr>
<tr>
<td>Wellness assessments, education and behavior change programs offered at and managed through the LWHC</td>
<td>Employees will have access to providers that may be in short-supply in the community (primary care), in a setting that is unique to Microsoft</td>
<td>Educate employees to increase their ability to act as more informed healthcare consumers</td>
</tr>
</tbody>
</table>

As the partnership has continued, the Microsoft HR team has asked Premise to investigate new and additional services to deliver on their vision and goals. Current, request is to develop process to expand the “reach” of the pharmacy services across the distance of the campus by enabling a delivery service through the Microsoft campus locker system.

Overview of the security in the locker mail system on campus (pictures included)
- Microsoft campus has approximately 86 buildings in the Puget Sound area.
- All mail/lockers are in areas only accessed by Microsoft “badged” employees/contractors
- All lockers are in buildings with temperature control (heat/air conditioning).
- Lockers are in a “bank” of lockers controlled by technology which
  - notifies staff of package arrival based on their Microsoft alias
  - generating access code to open the locker
  - to open the locker – the employee alias needs to be entered as well as the access code
  - system is notified if the item is picked up and removes this code from the system
  - intervals can be set to send out reminders to the employee’s email up to 3x if they haven’t picked up
  - reports can be generated to provide an overview of who and when lockers were accessed at any point
  - every time a new item is placed in the system – it generates a NEW access code/PIN for the next employee and their access
- The locker system/mail room work flow is attached.

Proposal for the mail project
- Specific lockers (3-4) would be designated within each building/locker bank
- Microsoft employees and dependents would have the opportunity to chose “DELIVERY” vs “pick up” for their REFILLS.
  - Microsoft employee’s alias’s would be attached to the refill request
  - Specific building would be requested for delivery.
The pharmacy technicians would bring REFILLS requested building and use the workflow to drop off medication in the pharmacy designated lockers;

- Employee alias entered and an email (configured differently to identify this is for a medication refill) along with the access code/PIN
- In order to access the refill, the employee needs to put in their alias and use the access code/PIN.
- This process allows continual monitoring and reporting of status of pick up etc.

Lockers including the keypad for accessing system

Keypad to access the system and the lockers
Pharmacy techs would choose “mail drop off” to enable the process for delivery. Microsoft employees would choose “pick up” to obtain their requested refill.

Microsoft employees would enter on this next screen the PIN they were emailed for the locker to open.
Prescription delivery from Walgreens pharmacy within Microsoft via locker system | OVERVIEW

Background:
Microsoft has had an on-site pharmacy on its Redmond, WA campus since 2011. The pharmacy operates in partnership with an on-site health center to help employees achieve their best health.

As the partnership has continued, the Microsoft HR team has asked Premise to investigate new and additional services to support Microsoft with delivering on their employee health and benefit goals.

Current request is to develop a process to expand the “reach” of the pharmacy services across the distance of the campus by enabling a prescription delivery service through the Microsoft campus locker system.

Solution criteria requirements:
- Required prescription counseling is performed by a pharmacist as needed
- Prescriptions are maintained in a physically secured and protected manner
- Reporting and monitoring are in place to support compliance to proper processing and handling procedures
Overview of the security in place to support the locker mail system on campus:

- Microsoft campus has approximately 86 buildings in the Puget Sound area
- All mail/lockers are in areas only accessed by Microsoft “badged” employees/contractors
- All lockers are in buildings with temperature control (heat/air conditioning)
- Lockers are in a “bank” of lockers controlled by technology which
  - notifies staff of package arrival based on their Microsoft alias
  - generating access code to open the locker
  - to open the locker – the employee alias needs to be entered as well as the access code
  - system is notified if the item is picked up and removes this code from the system
  - reports can be generated to provide an overview of who and when lockers were accessed at any point
  - every time a new item is placed in the system – it generates a NEW access code/PIN for the next employee and their access
Employee requests “medication” to be “delivered” to building locker vs pick up at on-site pharmacy
- Request is reviewed for “NEW” or “REFILL”
  - New: Pharmacist provides counseling for new script in person or by phone
- Pharmacy team reviews request and ensures 1) Credit card is on file for payment and 2) not a CONTROLLED
- Pharmacy team prepares MEDICATION & notes building #
- Pharmacy team “processes” MEDICATION in the IC+ system as “filled” and “paid”
- Technician arrives at building/locker kiosk
- Technician logs into locker kiosk through locker’s PC screen
- In “Delivery” screen, technician types employee’s name
- Employee name found:
  - No: Pharm Tech adds Patient/Recipient name & alias on-the-fly at locker terminal
  - Yes: Pharm Tech selects Pt/Recipient from list of names
- Technician selects locker size based on the item to be delivered
- Locker available:
  - No: Pharm Tech keeps delivery item and notifies Pt/Recipient and returns the delivery item to the pharmacy pick up bins
  - Yes: Technician selects locker on screen, locker door opens
- Technician places delivery item in the open locker and marks off delivery log
- Technician closes door, triggering locker system to email notification to employee

Employee receives email notification from locker kiosk of package waiting for them
- Email contains locker location and number, a numeric pick up code and a QR code
- Employee goes to locker kiosk
- Employee selects option to pick up a package
- Employee can type in numeric pick up code or scan QR code if scanner is available
- Locker door opens
- Employee retrieves their package and closes locker door
Prescription delivery from Walgreens pharmacy within Microsoft via locker system | LOCKER SECURITY

Process overview:
- Specific lockers (3-4) would be designated within each building/locker bank
- Microsoft employees and dependents would have the opportunity to chose “DELIVERY” vs “pick up” for their REFILLS.
  - Microsoft employee’s alias’s would be attached to the refill request
  - Specific building would be requested for delivery.
- The pharmacy technicians would bring REFILLS requested building and use the workflow to drop off medication in the pharmacy designated lockers;
  - Employee alias entered and an email (configured differently to identify this is for a medication refill) along with the access code/PIN
  - In order to access the refill, the employee needs to put in their alias and use the access code/PIN.
- This process allows continual monitoring and reporting of status of pick up etc.

Pharmacy techs would choose “mail drop off” to enable the process for delivery. Microsoft employees would choose “pick up” to obtain their requested refill.

Microsoft employees would enter on this next screen the PIN they were emailed for the locker to open.

©2019 Walgreen Co. All rights reserved