

**FILED**  
DEPARTMENT OF HEALTH  
DEPUTY CLERK  
CLERK: *Rae...*  
DATE: 12-21-07

STATE OF FLORIDA  
DEPARTMENT OF HEALTH  
BOARD OF PHARMACY

In Re: PETITION OF **TRUSTEES OF MEASE HOSPITAL, INC.**  
**D/B/A MEASE HOSPITAL-DUNEDIN**  
FOR WAIVER OF RULE 64B16-28.113, F.A.C.

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**ORDER DENYING PETITION FOR WAIVER**  
**OF RULE 64B16-28.113, F.A.C.**

THIS MATTER came before the Board of Pharmacy (hereinafter "the Board"), at a duly noticed public meeting held on October 16, 2007, in Tallahassee, Florida, on the petition of Trustees of Mease Hospital, Inc., d/b/a Mease Hospital-Dunedin (hereinafter "Petitioner"), for a waiver of administrative Rule 64B16-28.113, Florida Administrative Code. (A copy of the Petition is attached hereto and incorporated as Exhibit A).

The Petitioner was represented by Robert A. Weiss, Esquire. The Board was represented by Reginald D. Dixon, Assistant Attorney General.

After a complete review of the record in this matter, including consideration of the Petitioner's written evidence, the Board makes the following findings and conclusions:

**FINDINGS OF FACT**

1. Petitioner is a Class I general hospital and holds a Class II Institutional Pharmacy permit (PH 2424).
2. Petitioner provides pharmacy services on the premises of Mease Hospital Dunedin (MHD) to patients of MHD for use on premises of MHD.
3. Petitioner has entered an agreement to lease part of its premises to BayCare Long Term Acute, Inc. ("BayCare"). BayCare intends to, or has already, established a

forty-eight (48) bed long term acute care hospital on the premises of MHD.

4. Petitioner is seeking a waiver of Rule 64B16-28.113, Florida Administrative Code, which provides:

A board of Pharmacy permit shall be issued only to a single entity at a single location. The service provided by the permit shall be consistent with the issued permit. A single location shall be defined as:

(1) A contiguous area under the control of the permit holder. For purposes of this section, a public thoroughfare will be considered to have not broken the area of contiguity (emphasis supplied).

5. Petitioner is seeking the waiver of the definition of "single location" in order to allow MHD's Class II institutional pharmacy provide pharmacy services to the patients of BayCare.

6. Petitioner's intent is to staff the current pharmacy with "one pharmacist and 3.6 technicians."

7. There is competent, substantial evidence to support the Board's findings and conclusions.

### **CONCLUSIONS OF LAW**

1. The Board has jurisdiction over this matter pursuant to 120.542, Florida Statutes.

2. The purpose of the underlying statutes is to protect the public health, safety, and welfare.

3. Section 120.54(2), Florida Statutes, provides:

Variations and waivers shall be granted when the person subject to the rule demonstrates that the purpose of the underlying statute will be or has been achieved by other means by the person and when application of a rule would create a substantial hardship or would violate principles of fairness. For purposes of this section, "substantial hardship" means a demonstrated economic, technological, legal, or other type of hardship to the person requesting the variance or waiver. For purposes of this section, "principles of fairness" are violated when the literal application of a rule affects a particular person in a manner significantly different

from the way it affects other similarly situated persons who are subject to the rule.

4. Section 465.019(2)(b), Florida Statutes, provides:

"Class II institutional pharmacies" are those institutional pharmacies which employ the services of a registered pharmacist or pharmacists who, in practicing institutional pharmacy, shall provide dispensing and consulting services on the premises to patients of that institution, for use on the premises of that institution. However, an institutional pharmacy located in an area or county included in an emergency order or proclamation of a state of emergency declared by the Governor may provide dispensing and consulting services to individuals who are not patients of the institution. However, a single dose of a medicinal drug may be obtained and administered to a patient on a valid physician's drug order under the supervision of a physician or charge nurse, consistent with good institutional practice procedures. The obtaining and administering of such single dose of a medicinal drug shall be pursuant to drug-handling procedures established by a consultant pharmacist. Medicinal drugs may be dispensed in a Class II institutional pharmacy, but only in accordance with the provisions of this section.

5. Section 465.014, Florida Statutes, provides:

No person other than a licensed pharmacist or pharmacy intern may engage in the practice of the profession of pharmacy, except that a licensed pharmacist may delegate to nonlicensed pharmacy technicians those duties, tasks, and functions which do not fall within the purview of s. 465.003(13). All such delegated acts shall be performed under the direct supervision of a licensed pharmacist who shall be responsible for all such acts performed by persons under his or her supervision. A pharmacy technician, under the supervision of a pharmacist, may initiate or receive communications with a practitioner or his or her agent, on behalf of a patient, regarding refill authorization requests. No licensed pharmacist shall supervise more than one pharmacy technician unless otherwise permitted by the guidelines adopted by the board. The board shall establish guidelines to be followed by licensees or permittees in determining the circumstances under which a licensed pharmacist may supervise more than one but not more than three pharmacy technicians.

6. The stated intended services of the Petitioner are not consistent with the Class II institutional pharmacy permit and are in violation of Section 465.019(2)(b), Florida Statutes, which limits a Class II institutional pharmacy's services to providing "dispensing and consulting services on the premises to patients of that institution, for use on the premises of that institution."

7. The stated intent to staff the pharmacy with 1 pharmacist and 3.6 technicians

is in violation of the provisions of Section 465.014, Florida Statutes.

8. Petitioner has failed to establish that the purposes of the underlying statute would be achieved by a waiver of the rule.

Therefore it is

**ORDERED AND ADJUDGED** that:

The Petition for waiver of the rule is **DENIED**.

This order shall become effective upon filing with the Clerk of the Department of Health.

**DONE AND ORDERED**, this 19 day of December, 2007.

**BOARD OF PHARMACY**

*Rebecca R. Poston*

Rebecca R. Poston, R. Ph.  
Executive Director  
Florida Board of Pharmacy

**NOTICE OF RIGHTS**

1. Mediation is not available in this matter.
2. You may seek review of this Order, pursuant to Sections 120.569 and 120.57, Florida Statutes, and Rule 28-107.003 by filing a petition (request) with the Executive Director of the Board, within 21 days of your receipt of this Notice.

A. If you dispute any material fact upon which the Board's decision is based, you may request a hearing pursuant to Section 120.57(1), Florida Statutes. To do so, your petition (request) must contain the information required by Rule 28-106.201, Florida Administrative Code, including a statement of the material facts that are in dispute.

B. If you do not dispute any material fact, you may request a hearing pursuant to Section 120.57(2), Florida Statutes. Your petition (request) must include the information required by Rule 28-106.301, Florida Administrative Code.

3. If you request a hearing, you have the right to be represented by an attorney or other qualified representative, to take testimony, to call or cross-examine witnesses, to have subpoena and subpoena duces tecum issued, and to present written evidence or argument.

4. Unless a request for hearing is received on or before the above-stated deadline, or if a request for hearing is made, but the request is subsequently withdrawn, the Board will act in accordance with the provisions of Section 120.57, Florida Statutes, and Rule 28-106-111(4), Florida Administrative Code, the right to hearing shall be waived and this Notice on Intent to Deny shall become final agency action.

5. In addition, you may:

A. Request that the matter be reconsidered by the Board, and

B. Request to supplement your application with additional information.

6. This Notice shall be placed in and become a part of the Board's official records and shall become effective upon filing with the Clerk of the Department.

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by certified mail to: **Robert A. Weiss, Esq.**, 118 N. Gadsden Street, Suite 200, Tallahassee, Florida 32301; and by interoffice mail to: **Deborah B. Loucks**, Assistant Attorney General, Office of the Attorney General, The Capitol, PL-01, Tallahassee, FL 32399-1050, this 21 day of December, 2007

Kellene Davidson

**Deputy Agency Clerk**

STATE OF FLORIDA  
FLORIDA DEPARTMENT OF HEALTH

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TRUSTEES OF MEASE HOSPITAL,  
INC. d/b/a MEASE HOSPITAL, DUNEDIN,

Petitioner,

v.

STATE OF FLORIDA, FLORIDA  
DEPARTMENT OF HEALTH,

Respondent.

DOH Case No. 0

**FILED**  
DEPARTMENT OF HEALTH  
DEPUTY CLERK  
CLERK: *Rachelle*  
DATE 8-20-07

**PETITION FOR VARIANCE FROM  
RULE 64B16-28.113, FLA. ADMIN. CODE**

Trustees of Mease Hospital, Inc. d/b/a Mease Hospital-Dunedin, by and through its undersigned counsel, files this Petition for Variance from Rule 64B16-28.113, Fla. Admin. Code, and states as follows.

**THE PETITIONER**

1. The Petitioner is Trustees of Mease Hospital, Inc. Its address, telephone and fax numbers are 601 Main Street, Dunedin, Florida 34698, (727) 725-6222, (727) 725-6181 (fax).

**COUNSEL FOR PETITIONER**

2. Undersigned counsel represents Petitioner in this matter. His address is 118 N. Gadsden Street, Suite 200, Tallahassee, Florida, telephone number (850) 681-0191, facsimile number is (850) 681-9493.

**THE APPLICABLE RULE**

3. Petitioner seeks a variance from the following portion of Rule 64B16-28.113, Fla. Admin. Code. (the "Rule"):

A Board of Pharmacy permit shall be issued only to a single entity at a single location. The service provided by the permit shall be consistent with the issued permit. A single location shall be defined as:

- (1) A contiguous area under the control of the permit holder. For purposes of this section, a public thoroughfare will be considered to have not broken the area of contiguity (emphasis supplied).

#### CITATION TO THE STATUTES THE RULE IS IMPLEMENTING

4. Rule 64B16-28.113, Fla. Admin. Code, lists as the "law implemented" Sections 465.003(10)(a)<sup>1</sup>, 465.018, 465.019, 465.0193, and 465.0196. Fla. Stat. (2006).

#### THE IMPLEMENTED STATUTES

5. Those authorities provide as follows:

Section 465.003(10)(a), Fla. Stat. (2006), states that: "pharmacy" includes a community pharmacy, an institutional pharmacy, a nuclear pharmacy, a special pharmacy, and an Internet pharmacy.

Sections 465.003(a)1. through (a)5., Fla. Stat. (2006) state as follows:

(11)(a)1. "community pharmacy" includes every location where medicinal drugs are compounded, dispensed, stored, or sold or where prescriptions are filled or dispensed on an outpatient basis.

(11)(a)2. "institutional pharmacy" includes every location in a hospital, clinic, nursing home, dispensary, sanitarium, extended care facility, or other facility, hereinafter referred to as "health care institutions," where medicinal drugs are compounded, dispensed, stored, or sold.

(11)(a)3. "nuclear pharmacy" includes every location where radioactive drugs and chemicals within the classification of medicinal drugs are compounded, dispensed, stored, or sold. The term "nuclear pharmacy" does not include hospitals licensed under chapter 395 or the nuclear medicine facilities of such hospitals.

(11)(a)4. "special pharmacy" includes every location where medicinal drugs are compounded, dispensed, stored, or sold if such locations are not otherwise defined in this subsection.

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<sup>1</sup> Recodified at Section 465.003(11)(a), Fla. Stat. (2006).

(11)(a)5. "internet pharmacy" includes locations not otherwise licensed or issued a permit under this chapter, within or outside this state, which use the Internet to communicate with or obtain information from consumers in this state and use such communication or information to fill or refill prescriptions or to dispense, distribute, or otherwise engage in the practice of pharmacy in this state. Any act described in this definition constitutes the practice of pharmacy as defined in subsection (13).

Section 465.018, Fla. Stat. states that:

Community pharmacies; permits.

Any person desiring a permit to operate a community pharmacy shall apply to the department. If the board office certifies that the application complies with the laws of the state and the rules of the board governing pharmacies, the department shall issue the permit. No permit shall be issued unless a licensed pharmacist is designated as the prescription department manager responsible for maintaining all drug records, providing for the security of the prescription department, and following such other rules as relate to the practice of the profession of pharmacy. The permittee and the newly designated prescription department manager shall notify the department within 10 days of any change in prescription department manager.

Section 465.019, Fla. Stat. states that:

Institutional pharmacies; permits.

(1) Any institution desiring to operate an institutional pharmacy shall apply to the department. If the board certifies that the application complies with the laws of the state and the rules of the board governing pharmacies, the department shall issue the permit.

(2) The following classes of institutional pharmacies are established:

(a) "Class I institutional pharmacies" are those institutional pharmacies in which all medicinal drugs are administered from individual prescription containers to the individual patient and in which medicinal drugs are not dispensed on the premises, except that nursing homes licensed under part II of chapter 400 may purchase medical oxygen for administration to residents. No medicinal drugs may be dispensed in a Class I institutional pharmacy.

(b) "Class II institutional pharmacies" are those institutional pharmacies which employ the services of a registered pharmacist or pharmacists who, in practicing institutional pharmacy, shall provide dispensing and consulting services on the premises to patients of that institution, for use on the premises of that institution. However, an institutional pharmacy located in an area or county included in an emergency order or proclamation of a state of emergency declared by the



Governor may provide dispensing and consulting services to individuals who are not patients of the institution. However, a single dose of a medicinal drug may be obtained and administered to a patient on a valid physician's drug order under the supervision of a physician or charge nurse, consistent with good institutional practice procedures. The obtaining and administering of such single dose of a medicinal drug shall be pursuant to drug-handling procedures established by a consultant pharmacist. Medicinal drugs may be dispensed in a Class II institutional pharmacy, but only in accordance with the provisions of this section.

(c) "Modified Class II institutional pharmacies" are those institutional pharmacies in short-term, primary care treatment centers that meet all the requirements for a Class II permit, except space and equipment requirements.

(3) Medicinal drugs shall be stocked, stored, compounded, dispensed, or administered in any health care institution only when that institution has secured an institutional pharmacy permit from the department.

(4) Medicinal drugs shall be dispensed in an institutional pharmacy to outpatients only when that institution has secured a community pharmacy permit from the department. However, an individual licensed to prescribe medicinal drugs in this state may dispense up to a 24-hour supply of a medicinal drug to any patient of an emergency department of a hospital that operates a Class II institutional pharmacy, provided that the physician treating the patient in such hospital's emergency department determines that the medicinal drug is warranted and that community pharmacy services are not readily accessible, geographically or otherwise, to the patient. Such dispensing from the emergency department must be in accordance with the procedures of the hospital. For any such patient for whom a medicinal drug is warranted for a period to exceed 24 hours, an individual licensed to prescribe such drug must dispense a 24-hour supply of such drug to the patient and must provide the patient with a prescription for such drug for use after the initial 24-hour period. The board may adopt rules necessary to carry out the provisions of this subsection.

(5) All institutional pharmacies shall be under the professional supervision of a consultant pharmacist, and the compounding and dispensing of medicinal drugs shall be done only by a licensed pharmacist. Every institutional pharmacy that employs or otherwise utilizes pharmacy technicians shall have a written policy and procedures manual specifying those duties, tasks, and functions which a pharmacy technician is allowed to perform.

(6) In a Class II institutional pharmacy, an institutional formulary system may be adopted with approval of the medical staff for the purpose of identifying those medicinal drugs and proprietary preparations that may be dispensed by the pharmacists employed in such institution. A facility with a Class II institutional permit which is operating under the formulary system shall establish policies and procedures for the development of the system in accordance with the joint

standards of the American Hospital Association and American Society of Hospital Pharmacists for the utilization of a hospital formulary system, which formulary shall be approved by the medical staff.

Section 465.0193, Fla. Stat. states that:

Nuclear pharmacy permits.--Any person desiring a permit to operate a nuclear pharmacy shall apply to the department. If the board certifies that the application complies with applicable law, the department shall issue the permit. No permit shall be issued unless a duly licensed and qualified nuclear pharmacist is designated as being responsible for activities described in s. 465.0126. The permittee shall notify the department within 10 days of any change of the licensed pharmacist responsible for the compounding and dispensing of nuclear pharmaceuticals.

Section 465.0196, Fla. Stat. states that:

Special pharmacy permits.--Any person desiring a permit to operate a special pharmacy shall apply to the department for a special pharmacy permit. If the board certifies that the application complies with the applicable laws and rules of the board governing the practice of the profession of pharmacy, the department shall issue the permit. No permit shall be issued unless a licensed pharmacist is designated to undertake the professional supervision of the compounding and dispensing of all drugs dispensed by the pharmacy. The licensed pharmacist shall be responsible for maintaining all drug records and for providing for the security of the area in the facility in which the compounding, storing, and dispensing of medicinal drugs occurs. The permittee shall notify the department within 10 days of any change of the licensed pharmacist responsible for such duties. Every permittee that employs or otherwise utilizes pharmacy technicians shall have a written policy and procedures manual specifying those duties, tasks, and functions which a pharmacy technician is allowed to perform.

#### THE TYPE OF ACTION REQUESTED

6. Rule 64B16-28.113, Fla. Admin. Code, provides that a Board of Pharmacy permit "shall be issued to a single entity at a single location." It further defines a single location to mean: "[A] contiguous area under the control of the permit holder." (emphasis supplied).  
Petitioner seeks a variance from the Rule to allow Petitioner to provide pharmacy services to an

entity that is closely related to, but not under the direct control of the permit holder.<sup>2</sup> The entity, however, is located contiguous to the permit holder as contemplated by the Rule.

Specifically, Petitioner is licensed as a Class I general hospital pursuant to Section 395.003, Fla. Stat. (2006). It holds Board of Pharmacy Class II Institutional Permit Number PH 2424. Pursuant to its Permit, Petitioner provides, through employed registered pharmacists, dispensing and consulting services on the premises of Mease Hospital Dunedin to patients of that hospital, for use on the premises of Mease Hospital Dunedin.

Petitioner has agreed to lease a distinct part of its premises to BayCare Long Term Acute Care, Inc. ("BayCare LTAC"). BayCare LTAC holds Certificate of Need No. 9753, issued by the Agency for Health Care Administration ("AHCA") on April 7, 2006. The Certificate of Need authorizes BayCare LTAC to establish a forty-eight (48) bed long term acute care hospital on the premises of Mease Hospital Dunedin. The BayCare long term acute care hospital will hold its own Class I general hospital license. AHCA has advised BayCare LTAC that it may license and operate the long term acute care hospital without a permitted pharmacy. Accordingly, the Mease Hospital Dunedin Class II institutional pharmacy seeks this variance in order to provide pharmacy services to patients of the BayCare long term acute care hospital, located on the premises of Mease Hospital Dunedin.

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<sup>2</sup> Although BayCare LTAC is not under the control of the institutional pharmacy permit holder, Trustees of Mease Hospital, Inc., the corporations are closely related. BayCare LTAC is a wholly owned subsidiary of BayCare Health System, Inc. ("BayCare").

BayCare is the Tampa Bay Area's largest community based not-for-profit health system. BayCare functions pursuant to a joint operating agreement that includes three community health alliances. Trustees of Mease Hospital, Inc., is owned by Morton Plant Mease Health Care, Inc., one of the community health alliances. Both BayCare LTAC and Trustees of Mease Hospital are ultimately under the common control of BayCare.

**THE SPECIFIC FACTS THAT DEMONSTRATE  
A SUBSTANTIAL HARDSHIP**

7. There exists substantial hardship that justifies a variance from the Rule. Should the Board of Pharmacy not grant the variance, BayCare LTAC would be required to construct, equip, and operate a Class II institutional pharmacy. Petitioner estimates the cost of constructing and equipping a small pharmacy to be \$178,000. More significantly, Petitioner estimates the annual cost of staffing a Class II institutional pharmacy to be \$378,100. The pharmacy will be staffed by one pharmacist and 3.6 technicians. The total cost includes base salaries, paid time off, and benefits for the staff referenced above. The capital and operational costs associated with the operation of a Class II institutional pharmacy represent an economic hardship, as contemplated by Section 120.542(2), Fla. Stat. (2006).

**THE REASON WHY THE VARIANCE REQUESTED WOULD  
SERVE THE PURPOSES OF UNDERLYING STATUTES**

8. The variance requested will serve the purposes of the underlying statutes. As set forth above, the Rule implements Sections 456.003(10)(a), 456.018, 456.019, 456.0193 and 456.0196, Fla. Stat. (2006).

Section 456.003(10)(a) contains a definition of the term "pharmacy", including the term "institutional pharmacy." Section 456.018 establishes the criteria for issuance of community pharmacy permits. Section 456.019 establishes criteria for the issuance of institutional pharmacy permits, including Class II institutional pharmacies. Sections 456.0193 and 456.0196 establish criteria for issuance of nuclear pharmacy and special pharmacy permits, respectively.

Generally, the underlying statutes are intended to assure quality of care and service by requiring persons and/or institutions desiring to operate pharmacies to obtain a permit from the Department of Health. As Petitioner seeks a waiver in order to provide institutional pharmacy

services to patients of the long term acute care hospital, this analysis will focus on the purpose behind Section 465.019, which addresses institutional pharmacy permits.

Section 465.019(1), Fla. Stat. (2006), requires any institution desiring to operate an institutional pharmacy to obtain a permit. Petitioner has held its current Class II institutional pharmacy permit since April 1988. Its permit number is PH 2424. It has successfully operated a Class II institutional pharmacy since the issuance of this permit. Petitioner has demonstrated its ability to provide high quality institutional pharmacy services to patients on the premises of Mease Hospital Dunedin.

Pursuant to Section 465.019(2)(b), Fla. Stat. (2006), a Class II institutional pharmacy must employ the services of a registered pharmacist or pharmacists, who shall "provide dispensing and consulting services on the premises to patients of that institution, for use on the premises of that institution." As set forth above, Petitioner seeks a variance to allow it to provide the same institutional pharmacy services to patients of the BayCare LTAC as it currently provides to patients of Mease Hospital Dunedin. Petitioner intends to provide institutional pharmacy services to patients of the BayCare LTAC in precisely the same manner as it currently serves the patients of Mease Hospital Dunedin. It intends to serve the BayCare LTAC as if it were any other patient care unit on the premises of Mease Hospital Dunedin. In that regard, please find attached as Exhibit "A" The Mease Hospital Dunedin Pharmacy Department Plan for Providing Care/Service. The Plan will govern the Petitioner's provision of services to patients on the premises of the BayCare LTAC.

As noted above, the BayCare LTAC will be located on the premises of Mease Hospital Dunedin, just like all other patient care units on those premises. In fact, the BayCare LTAC will

be located closer to the Mease Class II institutional pharmacy than are many of the patient care units currently served by the pharmacy.


For all of the above reasons, Petitioner submits that the waiver requested will serve the purposes of the underlying statutes, particularly Section 456.019, Fla. Stat. (2006).

**WHETHER THE VARIANCE IS  
PERMANENT OR TEMPORARY**

9. The request for variance is permanent.

DATED on this 16<sup>th</sup> day of August, 2007.

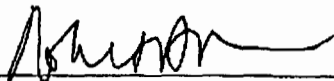
**PARKER, HUDSON, RAINER & DOBBS, LLP**

  
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Robert A. Weiss  
Fla. Bar No. 0222038  
Karen A. Putnal  
Fla. Bar No. 0037745  
Parker, Hudson, Rainer & Dobbs, LLP  
118 N. Gadsden Street, Suite 200  
Tallahassee, Florida 32301  
(850) 681-0191

Counsel for Trustees of Mease Hospital, Inc. d/b/a  
Mease Hospital-Dunedin

**CERTIFICATE OF SERVICE**

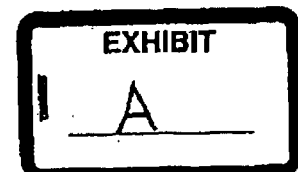
I hereby certify that the original and one copy of the foregoing Petition for Variance from Rule 64B16-28.113, Fla. Admin. Code, has been *Hand Delivered* to Mr. Sam Power, Agency Clerk at the Department of Health, 2585 Merchants Row Boulevard Prather Building, Suite 110, Tallahassee, Florida 32399 on this 16<sup>th</sup> day of August, 2007.

  
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Attorney

## Departmental Plan for Providing Care/Service Clinical Departments

### Department: Pharmacy (Mease Dunedin)

<b>I. Scope of Service:</b> The Pharmacy Department is responsible for the procurement, control and distribution of medications to patients, as required to meet the needs of the patients. The Pharmacy Department works in collaboration with the Pharmacy and Therapeutics Committee (P&T) to establish a formulary of approved drugs, development of therapeutic policy for the hospital and is responsible for the development and review of policies, procedures and protocols related to the medication use process.					
<b>Types of Patients</b>					
<b>Ages of Patients—check all that apply</b>					
Newborn neonate 0-28 days	Infant 29 days – 364 days	Child 2-12 years	Adolescent 13-17 years	Adult 18-75 years	Geriatric 75+ years
X	X	X	X	X	X
<b>Procedures/Services</b>			The Department of Pharmacy Services provides pharmaceutical care in all patient care settings to meet the needs of the patients, as determined by the administration in conjunction with the medical staff and nursing service. All services provided by the department are directed toward ensuring the safe and appropriate use of medications in a cost-effective manner. These services are provided to a wide array of patient types and include the following components: <b>Clinical Services:</b> Pharmacokinetic Monitoring, Medication Use Evaluation, TPN Monitoring, Adverse Drug Reaction Reporting, Therapeutic Drug Substitution, Clinical Pharmacy Intervention, Dosing to Renal Impairment, IV to PO Substitution, Interdisciplinary Rounds, and Medication Use Protocols. <b>Distributive Services:</b> Computerized Unit Dose distribution, IV Admixture Services including TPN and Chemotherapy compounding, Automated Dispensing System (Profile) and Decentralized Pharmacists.		
<b>Hours of Operation</b>			0700 – 2300, seven days a week, 365 days per year. On Call Pharmacist 2300 – 0700, seven days a week, 365 days per year.		
<b>II. Criteria for Entry/Admission to Service</b>					
<b>Patient Needs/Acuity</b>					
<b>III. Goals of Department/Service</b>					
<b>Goals</b>			See Team Map.		



**IV. Staffing Plan**

<b>System to Determine Staffing Levels</b>	The Pharmacy Department staffing consists of licensed pharmacists registered in the State of Florida and supportive personnel who are encouraged to become certified pharmacy technicians by examination.				
	Location	Pharmacist (Weekday)	Technician (Weekday)	Pharmacist (Weekend)	Technician (Weekend)
	Main Pharmacy	3 RPh 0700 - 1530 1 RPh 0800 - 1630 1 RPh 1430 - 2300	3 Tch 0700 - 1530 1 Tch 0800 - 1630 1 Tch 1430 - 2300	1 RPh 0700 - 1530 1 RPh 0730 - 1600 1 RPh 0800 - 1630 1 RPh 1430 - 2300	2 Tch 0700 - 1530 1 Tch 0800 - 1630 1 Tch 1430 - 2300
	Manager	1 RPh 0830 - 1700			

<b>Staffing Variance</b>	<p>The Pharmacy Management team monitors Visionware productivity indicators related to staffing efficiencies. As intensity changes, the Manager and Director, collectively determine what actions will best meet the needs of the department.</p> <p><u>Negative Variance:</u></p> <ol style="list-style-type: none"> <li>1. Cover with supplemental help in the following order: <ul style="list-style-type: none"> <li>• Increase part time or pool hours</li> <li>• Overtime</li> <li>• Share staff from other MPM Pharmacy Departments</li> <li>• Agency</li> <li>• Pharmacy Managers/Clinical Coordinators</li> </ul> </li> </ol> <p><u>Positive Variance:</u></p> <ol style="list-style-type: none"> <li>2. Work reassignment to other site if needed.</li> <li>3. Paid Time off or Voluntary time off.</li> </ol>
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<b>Skill Level Required</b>	Pharmacy Manager Clinical Pharmacist Certified Pharmacy Technician Pharmacy Technician - Non Certified
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<b>Staff Competency and Education</b>	<b>Pharmacy Manager:</b> <ul style="list-style-type: none"> <li>• Graduate of an accredited school of pharmacy</li> <li>• Florida Registered Pharmacist</li> <li>• Florida Registered Consultant Pharmacist</li> <li>• Bachelor's Degree or Pharm.D. Degree</li> </ul>
	<b>Clinical Pharmacist:</b> <ul style="list-style-type: none"> <li>• Graduate of an accredited school of pharmacy</li> <li>• Florida Registered Pharmacist</li> <li>• Bachelor's Degree or Pharm.D. Degree</li> </ul>
	<b>Certified Pharmacy Technician:</b> <ul style="list-style-type: none"> <li>• High School graduate or equivalent</li> <li>• Pharmacy Technician Certification</li> </ul>
	<b>Pharmacy Technician - Non Certified:</b> <ul style="list-style-type: none"> <li>• High School graduate or equivalent</li> </ul>

<b>Relationships</b>	
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