

Virginia Board of Pharmacy Guidance for Free Clinic Pharmacy Applicants

Free clinics applying for a pharmacy permit which do not have a need for a full service pharmacy should apply for a special or limited-use permit as described in 18VAC110-20-120 of the Virginia Board of Pharmacy Regulations and submit the required information with the application and fee. While waivers are granted by the Board on an individual case basis after considering the merit of each such request, the Board will normally waive certain provisions of the below regulation for free clinic pharmacies:

18 VAC 110-20-150-Physical Standards

- The size requirement of 240 square feet, provided there is adequate room inside the enclosure for storage of drug inventory, equipment, and records and for working space. *See* 18VAC110-20-150(A).
- The sink being inside the pharmacy, provided there is a sink with hot and cold running water in close proximity which is not a bathroom sink. *See* 18VAC110-20-150(F).

The Board typically requires that the provisions of 18VAC110-20-180 concerning the burglar alarm system and 18VAC110-20-190 concerning enclosures be met. A free clinic pharmacy may request a waiver of 18VAC110-20-190(C): (1) for the purpose of securing a drug order in the pharmacy if it is absolutely necessary that drugs be delivered in the absence of a pharmacist; or (2) for the purpose of repairing or upgrading essential pharmacy equipment when those repairs or upgrades cannot be reasonably performed while a pharmacist is present. A request for this waiver will be very closely scrutinized and granted at the discretion of the Board if deemed necessary and appropriate, and only then under the specific conditions of 18VAC110-20-120(B).