

**HEALTH REGULATION AND LICENSING ADMINISTRATION  
&  
HEALTH OCCUPATIONS BOARDS**

BOARD OF PHARMACY  
AUTHORITY FOR GUIDANCE

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DATE OF POLICY

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**POLICY STATEMENT**

**DUAL RESPONSIBILITY AND DISPENSING ERRORS**

This policy statement is issued to provide guidance to pharmacists practicing in the District of Columbia regarding responsibilities and accountability when two or more pharmacists are involved in the dispensing process. This policy is intended to clarify any perceived conflict between Title 22-B DCMR § 1913.5 and Title 22-B DCMR §§ 1914.3-1914.5.

Title 22-B DCMR § 1913.5 states,

“The pharmacist performing the final verification of a prescription shall be identified on the prescription record by name or initial, *and shall be fully responsible for the accuracy of the processing, compounding, and dispensing of the prescription order.*” Emphasis added.

Title 22-B DCMR §§ 1914.3-1914.5 state,

- 1914.3      A pharmacist shall be responsible for the completeness and accuracy of the information he or she enters into the automated data processing system.
- 1914.4      All entries made into the automated data processing system shall include the initials or identification code of the dispensing pharmacist responsible for the transaction giving rise to the entry.
- 1914.5      The pharmacist-in-charge shall maintain a record keeping system in which each pharmacist involved in dispensing shall sign a statement each day attesting to the fact that the prescription information entered into the computer that day has been reviewed and is correct as shown. The log book or file shall be maintained at the pharmacy for a period of five (5) years from the date of dispensing. Records which are more than two (2) years old may be stored off-site as long as they can be retrieved within three (3) business days of a request.

Section 1913 (Recordkeeping) and 1914 (Computerized Recordkeeping) of Title 22-B, should not be interpreted as exclusive of one another. To the contrary, the purpose of Section 1914 is to allow a pharmacy to use an automated data processing system to meet the recordkeeping requirements set forth in Section 1913.

Sections 1914.3-1914.5 of Title 22-B make it clear that each pharmacist is responsible for the completeness and accuracy of the information he or she enters into the automated data processing system. Further, each pharmacist involved in the dispensing process is to review the prescription information he or she has entered into the system and attest each day to the fact that the information has been reviewed and is correct as shown.

Where only one pharmacist is involved in the dispensing process, and has performed the final verification addressed in § 1913.5, there is no confusion as to the pharmacist's responsibility and accountability for any errors.

Where two or more pharmacists are involved in the dispensing process, the following scenarios illustrate how Sections 1913.5 and 1914.3-1914.5 will be applied.

### **Dispensing Scenario # 1 (All pharmacists are clearly documented in the record)**

Two or more pharmacists, whether at the same location or at two different pharmacy locations, verify the accuracy of individual tasks associated with the dispensing of the prescription order and assume responsibility for their respective individual tasks. For example, one pharmacist may verify the accuracy of the data entry while another may verify the accuracy of the product selection.

If the pharmacy's dispensing records capture the initials or names of each pharmacist and identify the individual tasks each performed as part of the dispensing process, then the pharmacist responsible for the task resulting in the dispensing error(s) shall be responsible for the resulting dispensing error(s). However, if the pharmacist performing the final verification of the prescription order knew of the error and failed to correct it, or through the verification process should have discovered the error made by another pharmacist(s), then the pharmacist performing the final verification may be held responsible for the dispensing error(s), in addition to the pharmacist(s) that actually made the error.

### **Dispensing Scenario # 2 (Only one pharmacist is documented in the record)**

Two or more pharmacists, whether at the same location or at two different pharmacy locations, verify the accuracy of individual tasks associated with the dispensing of the prescription order and assume responsibility for their respective individual tasks. For example, one pharmacist may verify the accuracy of the data entry while another may verify the accuracy of the product selection.

If a pharmacy's dispensing records only captures one pharmacist's initials or name, and that is the only dispensing record maintained, then that pharmacist shall be responsible for the entire transaction and any resulting dispensing errors.