



# Telemedicine Dispensing Procedure

National Health Regulatory Authority (NHRA)

Kingdom of Bahrain

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**Version 1.0**

## 1. Introduction

This document is meant to provide assistance to health care facility and professionals on how to comply with governing statutes and regulations. The document also provide assistance to staff on how NHRA mandates and objectives should be implemented in a manner that is fair, consistent and effective.

The government is committed to provide equal access to quality care to all. Thus, the temporary preventive measure of Telemedicine is introductory to the mainstream. Telemedicine practice can prevent the transmission of infectious diseases reducing the risks to both health care workers and patients. Unnecessary and avoidable exposure of the people involved in delivery of healthcare can to be avoided using telemedicine and patients can be screened remotely. It also reduces the inconvenience/impact to family and caregivers and social factors. Telemedicine can play a particularly important role in cases where there is no need for the patient to physically see the medical professional, e.g. for regular, routine check-ups or continuous monitoring. Telemedicine can reduce the burden on the secondary hospitals.

The purpose of these procedure is to give practical guidance to medical licensed practitioner in the public and private pharmacy and encourage to consider the use of telemedicine as a part of normal practice during the crisis situation. This guidance will also ensure that the dispensing of the medicines by the pharmacist is done in a secured and efficient manner.

This document should be read in conjunction with other applicable guideline documents. The medical licensed practitioner must abide the rules and regulation directed in the Bahrain pharmacy law and its amendment [Decree-Law No. \(20\) of 2015 Amending Decree-Law No. \(18\) of 1997 on the Organization of the Pharmacy Profession and Pharmaceutical Centers, Resolution No. \(63\) of 2019 on Requirements and Procedures for Practicing Pharmacy Professions and Licensing of Pharmaceutical Facilities](#)

## 2. Procedure:

Prescribing medications, via telemedicine consultation is at the professional discretion of the licensed medical practitioner. It requires the same professional accountability as in the traditional in-person consult. If a medical condition requires a particular protocol to diagnose and prescribe as in a case of in-person consult, then same prevailing principle will be applicable to a telemedicine consult.

Medical licensed practitioner may prescribe medicines via telemedicine ONLY when licensed medical practitioner is satisfied that he/she has gathered adequate and relevant information about the patient's medical condition and prescribed medicines are in the best interest of the patient.

*Prescribing Medicines without an appropriate diagnosis/provisional diagnosis will amount to a professional misconduct*

The categories of medicines that can be prescribed are listed below: (See table in page 4)

- 1) **List P (Pharmacy only):** It will comprise those medicines which are safe to be prescribed through any mode of tele-consultation. In essence they would comprise of:
  - a) Medicines which are used for common conditions and are often available 'pharmacy only'. For instance, these medicines would include, paracetamol, ORS solutions, cough lozenges etc
  - b) Medicines that may be deemed necessary during public health emergencies.
- 2) **List POM (Prescription only medicines):** These medications are those which can be prescribed during the first consult which is a video consultation and are being re-prescribed for re-fill, in case of follow-up. This would be an inclusion list, containing relatively safe medicines with low potential for abuse. See list A in Annex One of the medications that a licensed medical practitioner can prescribe to a patient who is first consult, undergoing follow-up consult, as a refill.
- 3) **Prohibited List:** A licensed medical practitioner providing consultation via telemedicine **cannot prescribe** medicines in this list. These medicines have a high potential of abuse and could harm the patient or the society at large if used improperly
  - a) Medicines listed in **narcotics, psychotic and precursor** for the KINGDOM or any **Narcotic and Psychotropic** substance listed in the Narcotic Drugs and Psychotropic Substances.
  - b) Medicines listed as **semi controlled** shall not be dispensed via tele medicine.

**Examples of drugs in the above-mentioned lists are summarized in Annexure 1**

**Prescription requirements:**

1. The prescription received by the pharmacist must be signed and stamped by the doctors.
2. Following are mandatory to be part of prescription
  - a) Name of the doctor
  - b) Speciality
  - c) Address of the hospital/clinic
  - d) Doctor's signature
  - e) Doctors 'stamp
  - f) Date of prescription
  - g) Name of patient
  - h) CPR number of patients

**Issuing a Prescription and Communicating the Information**

1. If the licensed medical practitioner has prescribed medicines, licensed medical practitioners shall issue a prescription as per the NHRA polices (Code of Professional Conduct) Regulations and shall not contravene the laws and decisions of the Kingdom. A sample format is suggested in Annex 2.
2. Licensed medical practitioner shall provide photo, scan, digital copy of a signed and stamped

prescription or e-Prescription to the patient via email or any messaging platform

**Matrix of permissible drug lists based on the type and mode of consultation**

<b>List Group</b>	<b>Mode of Consultation [Video/Audio]</b>	<b>Nature of Consultation [First consultation/ Follow-up]</b>	<b>List of Medicines</b>
<b>P</b>	Any	Any	List P <sup>1</sup>
<b>POM</b>	Video/any	First Consultation Follow-up, for continuation of medications	List POM <sup>2</sup>
<b>Prohibited</b>	Not to be prescribed	Not to be prescribed	narcotics, psychotropics and precursor for the Kingdom <sup>3</sup> Semi-controlled medicines.
<p>1. This list included commonly used 'pharmacy only' medications such as Paracetamol, Oral Rehydration Solution (ORS) packets, Antacids etc. This list also includes medicines that may be deemed necessary during emergencies and would be notified from time to time</p> <p>2. This list includes usually prescribed medications for which diagnosis is possible only by video consultation such as antifungal medications for Tinea Cruris, Ciprofloxacin eye drops for Conjunctivitis etc. and Re-fill medications for chronic diseases such as Diabetes, Hypertension, Asthma etc. This list also includes 'add-on' medications which are used to optimize an existing condition. For instance, if the patient is already on Atenolol for hypertension and the blood pressure is not controlled, an ACE inhibitor such as Enalapril</p> <p>3. For instance, Anti-Cancer drugs; Narcotics such as Morphine, Codeine etc</p>			

## Annex 1

### List P

1. **Common pharmacy only medications such as**
  - Antipyretics: Paracetamol
  - Cough Supplements: Lozenges,
  - Cough/ Common-cold medications (such as combinations of Acetylcysteine, Ammonium Chloride, Guaifensen, Ambroxol, Bromhexene, Dextromethorphan)
  - ORS Packets
  - Syrup Zinc
  - Supplements: Iron & Folic Acid tablets, Vitamin D, Calcium supplements
  - Etc
  
2. **Medications notified by NHRA in case from time to time on an Emergency basis**
  - Such as Chloroquine for Malaria control for a specific endemic region, when notified by Government

### List POM

- Ointments/Lotion for skin ailments: Ointments Clotrimazole, Mupirocin, Calamine Lotion, Benzyl Benzoate Lotion etc
- Local Ophthalmological drops such as: Ciprofloxacin for Conjunctivitis, etc
- Local Ear Drops such as: Clotrimazole ear drops, drops for ear wax etc.
- Hypertension: Enalapril, Atenolol etc
- Diabetes: Metformin, Glibenclamide etc
- Asthma: Salmeterol inhaler etc
- ongoing chronic medications to optimize management such as for Hypertension: E.g., add-on of Thiazide diuretic with Atenolol
- Diabetes: Addition of Sitagliptin to Metformin
- Etc

**Annex II**  
**Sample prescription**

Name of the medical practitioner		Date	
<b>Name of hospital/clinic</b>			
Address of hospital/clinic			
Contract details			
Patient name			
CPR number			
List of medicines prescribed			
Signature of medical practitioner and stamp			
Note: this prescription is generated on a teleconsultation			

### 3. References

1. Indian Medical Council: <https://www.mohfw.gov.in/pdf/Telemedicine.pdf>
2. [Decree-Law No. \(20\) of 2015 Amending Decree-Law No. \(18\) of 1997 on the Organization of the Pharmacy Profession and Pharmaceutical Centers](#)
3. [Resolution No. \(63\) of 2019 on Requirements and Procedures for Practicing Pharmacy Professions and Licensing of Pharmaceutical Facilities](#)