

OPERATION OF ALTERNATE DELIVERY SITES

On September 1, 2026, [Board Rule .1822 \(21 NCAC 46.1822\)](#) came into effect. Rule .1822 authorizes the use of “alternate delivery sites” to provide drugs, devices, or medical equipment to patients, or receive prescriptions from patients, in North Carolina. This guidance document details the pick-up/drop-off authorization, as well as the standards that govern operation of an alternate delivery site.

Q: What is an alternate delivery site?

A: An alternate delivery site is a facility holding a limited-service pharmacy permit from the Board of Pharmacy, staffed by a pharmacist or a certified technician, to which the “home” pharmacy may send dispensed drugs, devices, or medical equipment for final transfer to a patient. The pharmacist or certified technician present at an alternate delivery site may also accept a written prescription from the patient or patient’s agent to transmit to the home pharmacy. 21 NCAC 46.1822(e).

Q: Is an alternate delivery site a pharmacy?

A: Yes. A “pharmacy” is “any place where prescription drugs are compounded or dispensed.” G.S. § 90-85.3(q). Accordingly, an alternative delivery site must hold a limited-service pharmacy permit. 21 NCAC 46.1822(b) & [.1616\(a\)\(4\)](#)

Board staff need to complete some programming to the on-line limited-service permit application for alternate delivery sites, as well as some updates to the pharmacy services menu for existing permits that may wish to convert from a full pharmacy to an alternate delivery site. Board staff will update this FAQ when completed. In the meantime, any entity wishing to establish a new alternate delivery site, or to convert an existing pharmacy to an alternate delivery site, should [call or email](#) the Board’s Director of Licensing, Missy Betz, for instructions.

Q: Must an alternate delivery site be affiliated with a full-service, home pharmacy?

A: Yes. 21 NCAC 46.1822(a) & (b). The alternate delivery site must be located 60 or fewer miles from the home pharmacy. 21 NCAC 46.1822(c)(1). The alternate delivery site may not be located in the same building or on the same property as the home pharmacy, nor may it be located on residential property. 21 NCAC 46.1822(c)(3) & (c)(4). The alternate delivery site may only be used by one (the home) pharmacy. 21 NCAC 46.1822(d)(2).

Q: May an alternate delivery site be placed in the office of a prescriber?

A: Yes, but only if the alternate delivery site is under the control of the home pharmacy and staffed by personnel from the home pharmacy. If placed in a prescriber office, the prescriber must offer patients a choice of pharmacy. And the pharmacy may not give or receive compensation from the prescriber for the placement of the site or for any prescriptions delivered at the site. 21 NCAC 46.1822(c)(3); [G.S. § 90-401](#) & [402](#).

Q: How must an alternate delivery site be staffed by the home pharmacy?

A: The home pharmacy may staff an alternate delivery site with a pharmacist and/or a certified technician who is employed by the home pharmacy. 21 NCAC 46.1822(d)(1). More information concerning the requirements for certified technician status is found [here](#). All staff at an alternate delivery site must wear identification as required by North Carolina law. 21 NCAC 46.1822(d)(5); [21 NCAC 46.2506](#); [G.S. § 90-640](#).

Q: If I choose to staff an alternate delivery site with a certified technician, what are the supervision requirements?

A: Whenever the alternate delivery site is open, a pharmacist employed by the home pharmacy must be available for patient counseling, and for consultation with the certified technician. 21 NCAC 46.1822(d)(4). A pharmacist responsible for providing real-time patient consultation may not provide this service for more than three (3) alternate delivery sites simultaneously. 21 NCAC 46.1822(f).

Q: What pick-up services may an alternate delivery site provide?

A: A pharmacist or certified technician may personally deliver any drug, device, or medical equipment to the patient or patient's agent that has been previously dispensed by the home pharmacy. Any drug, device, or medical equipment delivered at an alternate delivery site must have had all physical steps in the dispensing process (except final

delivery to the patient) – including filling and patient-specific labeling – completed at the home pharmacy.

The alternate delivery site may not maintain any drugs, devices, or medical equipment on site other than those delivered from the home pharmacy after all physical steps in the dispensing process have been completed. 21 NCAC 46.1822(e)(1).

The home pharmacy must retrieve any drugs, devices, or medical equipment not delivered to the patient within twenty-one (21) days of their being delivered to the alternate delivery site. 21 NCAC 46.1822(f)(8). Drugs, devices, or medical equipment not picked up by a patient may be returned to the stock of the home pharmacy. The pharmacist-manager is responsible for ensuring that any drugs, devices, or medical equipment returned to the home pharmacy's stock are not adulterated, misbranded, or otherwise unsafe.

Q: May an alternate delivery site provide controlled substances to patients?

A: Yes, as long as the alternate delivery site complies with all federal and state controlled substances laws and rules – including obtaining any required registrations. If the alternate delivery site provides controlled substances to patients, the pharmacist or certified technician doing so must comply with [North Carolina law concerning photo identification prior to dispensing certain controlled substances](#).

Q: What drop-off services may an alternate delivery site provide?

A: A pharmacist or certified technician may personally accept a written prescription from a patient or the patient's agent. The prescription must be transmitted to the home pharmacy so all physical steps in the dispensing process occur there. Patients or patients' agents may not leave prescriptions at the alternate delivery site except by personal delivery to the pharmacist or certified technician. 21 NCAC 46.1822(e)(2).

Prescriptions transmitted verbally or electronically by prescribers must be transmitted to the home pharmacy, and not the alternate delivery site.

Q: What general operational requirements apply to an alternate delivery site?

A: The following general requirements apply to an alternate delivery site (21 NCAC 46.1822(f)):

1. The home pharmacy must obtain the affirmative consent of a patient to use the alternate delivery site. And the home pharmacy may not mandate that a patient pick up her prescriptions from an alternate delivery site.
2. The home pharmacy must notify the alternate delivery site of the anticipated arrival time of drugs, devices, or medical equipment; the name of the patient for whom the drug, device, or medical equipment is dispensed; and any special storage requirements that attach to the drugs, devices, or medical equipment.
3. The alternate delivery site's hours must be reported to the Board and the site must be open during those hours.

In the event that the alternate delivery site has an unexpected closure, the pharmacist-manager of the home pharmacy must comply with the [Rule .2516's notification requirements](#).

If the home pharmacy discontinues use of an alternate delivery site, the pharmacist-manager must notify the Board within ten (10) days of doing so. 21 NCAC 46.1822(c)(5).

4. The pharmacist or certified technician at the alternate delivery site must convey an offer to counsel as required by [Rule .2504](#). The alternate delivery site must provide a means for a patient to have immediate real-time consultation with a pharmacist who has access to all the home pharmacy's patient information. A certified technician may not perform patient counseling. A pharmacist responsible for providing real-time patient consultation may not provide this service for more than three (3) alternate delivery sites simultaneously.
5. The alternate delivery site must have real-time access to the home pharmacy's information system and comply with all recordkeeping requirements for drugs, devices, and medical equipment delivered at the site.

Q: What security requirement apply to an alternate delivery site?

A: The general security requirements that apply to an alternate delivery site (21 NCAC 46.1822(g)) are:

1. The home pharmacy may not deliver drugs, devices, or medical equipment to the alternate delivery site unless satisfied that the items may be stored as safely and effectively as if they were present at the home pharmacy itself.
2. Drugs, devices, and medical equipment delivered to the alternate delivery site must be stored in a lockable room, cabinet, or other irremovable device. The lockable storage must remain locked except when items are being removed from storage. Access must be restricted to the pharmacist or certified technician who is personally delivering the items to a patient.
3. The home pharmacy must ensure that the transportation and storage of drugs, devices, and medical equipment at the alternate delivery site occurs in environmental conditions that ensure the items will not become adulterated and that accord with manufacturer's specifications.
4. The delivery and storage of drugs, devices, and medical equipment at the alternate delivery site must be under continuous, recorded video surveillance. Recordings must be maintained for a minimum of 90 days.

Q: What policies and procedures must the home pharmacy develop and implement to operate an alternate delivery site?

A: The pharmacist-manager must implement the following policies and procedures to ensure safe, lawful operation of the alternate delivery site. These policies must be maintained at both the home pharmacy and the alternate delivery site. They must be reviewed and updated annually (21 NCAC 46.1822(h)):

1. Tracking and maintaining the security of delivery of drugs, devices, and medical equipment between the pharmacy and the alternate delivery site.
2. Maintaining the security of the alternate delivery site and the drugs, devices, and medical equipment at the alternate delivery site.
3. Transporting and maintaining any drugs, devices, and medical equipment in the appropriate environmental conditions.

4. Describing the assignment of responsibilities to, and training of, pharmacy personnel regarding the transportation, storage, and delivery procedures for the alternate delivery site.
5. Offering to counsel and providing counseling at the alternate delivery site, including keeping records of offers to counsel.
6. Orienting participating patients on use of the alternate delivery site; notifying patients when their dispensed prescription will be available at the alternate delivery site; and ensuring that use of the alternate delivery site does not interfere with the delivery of drugs, devices, and medical equipment to patients.
7. Keeping records of the delivery of drugs, devices, and medical equipment to patients at the alternative delivery site.
8. Returning to the home pharmacy any drugs, devices, or medical equipment that are not delivered to the patient.
9. Assuring confidentiality of patient information.
10. Inspecting the alternate delivery site during each required inspection. The pharmacist-manager must perform an in-person, on-site visit of the alternate delivery site at least once per calendar quarter to inspect the site, review its operations, and ensure that the site is operating in compliance with all applicable State and federal law. [21 NCAC 46.1616\(c\)\(1\)](#).