



MASSACHUSETTS BOARD OF REGISTRATION IN PHARMACY

newsletter to promote pharmacy and drug law compliance

Scope of Practice

Over the years, the Massachusetts Board of Registration in Pharmacy has received several questions regarding the scope of practice for its licensees. With this in mind, a **policy** was developed to capture permitted professional activities that the Board has deemed to be within the scope of practice of pharmacists, pharmacy interns, and pharmacy technicians.

Some of the limitations are set by statute or regulation and are outlined in the policy for clarity purposes. For instance, pharmacists and interns may only administer certain vaccines and specific medications for the treatment of mental illness and substance use disorder (SUD) as defined in **105 Code of Massachusetts Regulations (CMR) 700.00** and associated guidance documents. No other medications may be administered, including ones used for skin tests.

Other nontraditional activities have been specifically permitted by the Board and include the allowance of two certified technicians performing perpetual inventory, remote processing of prescriptions by technicians, and the use of technology to verify certain inventory management functions in a health care facility.

As pharmacy practice evolves and laws and regulations change, this policy will continue to be updated to guide pharmacy licensees in their practice.

Scam Calls

The Massachusetts Bureau of Health Professions Licensure (BHPL) has issued a **warning** about individuals impersonating Massachusetts BHPL investigators, Drug Enforcement Administration (DEA) agents, DEA investigators, Massachusetts Drug Control Unit investigators, Federal Bureau of Investigation investigators, and other law enforcement personnel as part of an extortion scheme.

The impersonators are contacting licensees by telephone, stating that the licensee is the subject of an investigation, and are demanding money or threatening to revoke the individual's license.

Please be advised that the BHPL will not contact licensees by telephone to demand money. Investigators may call to interview licensees or request documentation only. BHPL licensing boards will only send written notices to your address of record regarding formal actions against your license such as suspension or revocation.

Licensees receiving such a telephone call are encouraged to report the call to the [Federal Communications Commission](#).

Getting to Know the Board Staff – Leo McKenna

Leo McKenna, PharmD, RPh, began his tenure at the Board in 2004 as the quality assurance coordinator. His extensive clinical pharmacy experience includes director of pharmacy, clinical pharmacy coordinator with McKesson MedManagement, and clinical pharmacy consultant with the Department of Developmental Services. His work involved documenting, categorizing, and performing a comprehensive analysis of the medication errors that had been reported to the Board. Leo's analysis of those errors was published in 2005, and became the framework for the Board's Continuous Quality Improvement regulations at [247 CMR 15.00](#).

Over the next 10 years, Leo served as a member of the Massachusetts Coalition for the Prevention of Medical Errors and traveled across the commonwealth to help raise awareness of medication errors and how to prevent them. Additionally, Leo began performing site visits to pharmacies to evaluate work environments and make recommendations for error prevention. He also played an integral role in drafting the Board's [best practice recommendations](#) for Massachusetts-licensed pharmacists, which are still in use today.

In 2013, Leo transitioned to an investigative role and brought his unique perspective and practical advice to pharmacy inspections. An example of one of his practical recommendations is to plug a clock into the same outlet as the refrigerator. If the time is incorrect when opening the pharmacy in the morning, then power has been lost and the stability of the affected medications must be evaluated. Such practicality makes one wonder, "Why didn't I think of that!" He has even been known to climb ladders for a bird's eye view when evaluating a sterile compounding pharmacy's HVAC system!

Throughout his tenure with the Board, Leo has continued his clinical work as part of the multidisciplinary team of the Regional Evaluation and Assessment for Community Habilitation program, overseeing medication profiles for individuals in group home settings. As a graduate of the Massachusetts College of Pharmacy and Health Sciences, with a bachelor of science degree in pharmacy in 1981 and a doctor of pharmacy degree in 2000, Leo avidly supports education and has eagerly precepted numerous students, always instilling the importance of the vital role the pharmacist plays on the health care team. Leo's advice to pharmacy students is that "although pharmacy has changed over the years, the more involvement a pharmacist has in clinical outcomes, the better off the profession is going to be."

In his free time, Leo enjoys skiing, playing drums in a band named Twice Lucky, and especially “boating, boating, and more boating!” Best of all, he and his wife Vicki spend a lot of time having fun with their grandchildren, “all seven of them!”

Fun Fact: Leo authored this quarterly newsletter from 2004-2007!

Perpetual Inventory Reminders

A perpetual inventory of all Schedule II medications must be kept and reconciled at least once every 10 days, in accordance with [247 CMR 9.01\(14\)](#). This includes all expired and damaged Schedule II drugs in addition to the active inventory. Until they can be reverse distributed, ensure that those expired or damaged Schedule II products are stored in a secure location (eg, a safe) and are properly segregated to prevent accidental dispensing. Frequent inventory reconciliation not only helps you to uncover dispensing errors but can also deter and detect potential drug diversion in a timely manner. In accordance with the Board’s [policy](#), any possible or confirmed losses must be [reported](#) to the Board within seven business days.

Did You Know?

- The Board offers a rehabilitation program for its licensees who are struggling with [SUD](#) involving alcohol or drugs. The program is voluntary, confidential, and non-disciplinary as long as the licensee complies with the requirements. Please review the [program information](#) and feel free to contact Ed Taglieri via email at edmund.taglieri@mass.gov with any additional questions.
- Even though [e-prescribing](#) is required for federally controlled substances, a pharmacist receiving an otherwise valid written or oral prescription may dispense it without having to verify that a waiver has been granted or that an exception applies. Essentially, there has been no change to this aspect of pharmacy practice!
- Most Massachusetts insurance plans, including [MassHealth](#), Group Insurance Commission, and private insurers, are required to cover a 12-month supply of birth control pills to be dispensed at once. Check with the insurer for any questions.
- Please review the Board’s [website](#) for updates regarding the coronavirus disease 2019 state of emergency.
- Paper reminder notices regarding license renewal will no longer be provided. The Board will soon move to email reminders, so please keep your [email address updated](#).
- If you have not already done so, consider being added to the Board’s email list for any new updates the Board may have to share. Simply [email](#) the Board and ask to be placed on the distribution list!

Board Staff

- David Sencabaugh, RPh, Executive Director
- Monica Botto, CPhT, Associate Executive Director
- William Frisch, Jr, RPh,
Director of Pharmacy
Compliance
- Michelle Chan, RPh, Quality
Assurance Pharmacist
- Heather Engman, MPH, JD,
Counsel to the Board
- Joanne Trifone, RPh, Director
of Pharmacy Investigations
- Ed Taglieri, RPh, Pharmacy Substance Use Disorder Program Supervisor

***National Pharmacy Compliance News
Now Available!***

Visit NABP's website for the latest regulatory updates and news from FDA, USP, NABP, and more.

Read National News

The Massachusetts Board of Registration in Pharmacy News is published by the Massachusetts Board of Registration in Pharmacy and the National Association of Boards of Pharmacy Foundation® (NABPF®) to promote compliance of pharmacy and drug law. The opinions and views expressed in this publication do not necessarily reflect the official views, opinions, or policies of NABPF or the Board unless expressly so stated.

David Sencabaugh, RPh - Executive Director

Lemrey "Al" Carter, PharmD, MS, RPh - National News Editor & Executive Editor

Amy Sanchez - Publications and Editorial Manager

239 Causeway Street, 5th Floor | Boston, MA 02114 | www.mass.gov/dph/boards/pharmacy
