



MASSACHUSETTS BOARD OF REGISTRATION IN PHARMACY

newsletter to promote pharmacy and drug law compliance

Out-of-State DEA Numbers on Schedule II Narcotic Prescriptions

Except as provided for in [state law](#), Massachusetts pharmacies may only fill Schedule II narcotic prescriptions from authorized prescribers in Massachusetts, contiguous states, or Maine. However, the Massachusetts Board of Registration in Pharmacy has become aware of some pharmacies that are filling these prescriptions from prescribers with Drug Enforcement Administration (DEA) numbers that have not been issued to a prescriber in one of these states.

In some cases, the prescribers are actually located in Massachusetts and have a DEA registration with a Massachusetts address, but the pharmacy system associates the prescriptions with a DEA number from another state where the prescriber had previously practiced. Many of these prescriptions were electronically prescribed but were not flagged or stopped by pharmacy systems for an “invalid” DEA number. Pharmacies should review their operating systems to ensure that prescriptions with a DEA number that is not from Massachusetts, a contiguous state, or Maine is flagged or stopped prior to filling and that DEA master files are up to date.

Extended Absence of a Manager of Record

A Board-licensed pharmacist interim manager must be named prior to a planned absence of a manager of record (MOR) who is expected to be absent from their position for greater than 30 days, or within five calendar days of any unplanned absence. An interim manager is expected to fulfill the duties of the MOR in their

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absence. The Board's **policy** requires immediate notification to the Board by email to include the pharmacy details as well as the interim manager's name and license number.

A controlled substance (CS) inventory must be performed and signed by both the present MOR as well as the interim manager. If the present MOR is unavailable, another licensed pharmacist may act in their place.

The Board must be notified by email when the MOR returns or, if the MOR is away from the position for 100 days or more, a new **application** must be submitted for a change of MOR. In either case, a CS inventory must be performed with the interim manager and returning or new MOR.

COVID-19 Therapeutics

This **new policy** provides the requirements to prescribe and either dispense or administer medications to treat the coronavirus disease 2019 (COVID-19) as allowed by the **federal Public Readiness and Emergency Preparedness Act (PREP Act)**. Pharmacists may order, dispense, and administer (pharmacy interns and qualified pharmacy technicians may only administer) any Food and Drug Administration (FDA)-approved, authorized, cleared, or licensed COVID-19 therapeutics to populations authorized by FDA and Centers for Disease Control and Prevention.

If the therapeutic has an **emergency use authorization (EUA)**, it must specifically allow ordering by a pharmacist and that ordering must be done in accordance with the **Information for Providers About Therapeutic Treatments for COVID-19** as issued by the Massachusetts Department of Public Health. Specific information and requirements on the prescribing of Paxlovid™ are also provided in the policy as pharmacists are now able to prescribe it in accordance with its updated EUA.

Requirements for training (including competency in intramuscular gluteal administration), facilities, and clinical monitoring and observation of individuals after administration are also outlined. Be mindful that the administration of COVID-19 therapeutics by qualified pharmacy personnel is limited to subcutaneous or intramuscular routes and only in accordance with FDA approval, authorization, clearance, or licensing.

COVID-19 Vaccine and Evusheld Administration by Qualified Pharmacy Personnel

Similar to the administration of COVID-19 treatments, pharmacists, pharmacy interns, and qualified pharmacy technicians may administer Evusheld™ (tixagevimab co-packaged with cilgavimab) to certain populations for the prevention of COVID-19. This **new policy** not only provides an update to the COVID-19 vaccine policy, it also adds instruction for training on how to administer Evusheld, including a competency requirement for intramuscular gluteal

administration. Requirements for facilities and clinical monitoring and observation of individuals after administration (ie, one hour in accordance with the EUA) are also outlined.

Pharmacy Technician Trainees and Automated Dispensing Devices

Pharmacy technician trainee (PTT) **scope of practice** only allows them to perform pharmacy activities under the direct supervision of a pharmacist. However, a **policy** was developed to allow licensed PTTs to transport, load, and check expiration dates of Schedule III-VI medications in an **automated dispensing device (ADD)** without **direct** pharmacist supervision as long as it is within a Massachusetts-licensed health care facility (eg, hospital) that has an on-site pharmacy.

Although the activities outlined in the policy may be performed without direct pharmacist supervision, any activities performed by support personnel must be under the direction and supervision of a pharmacist. The loading of pharmacist-verified Schedule III-VI stock medications or removal of expired medications from an ADD located in a patient care area must utilize barcode scanning or other electronic validation. In addition to the quality assurance checks outlined in the policy, all electronic transactions must be tracked as required by the **ADD policy**.

Emergency Contraception Statewide Standing Order

Chapter 127 of the Acts of 2022, **An Act Expanding Protections for Reproductive and Gender-Affirming Care**, provides for a **statewide standing order** for all retail pharmacies to use for the dispensing of emergency contraception. While not required to dispense emergency contraception under the standing order, a training program is available through the **MGH Institute of Health Professions** that also offers continuing education (CE) credits. The training program covers both the **ACCESS law** and more information on emergency contraception.

For additional information, visit the **Emergency Contraception – Information for Pharmacies web page**.

Getting to Know the Board Staff: Monica Botto

Monica Botto, CPhT, is the associate executive director of the Board whose primary duties include oversight of the licensing department, including pharmacies, pharmacists, and pharmacy technicians.

Monica had always wanted to work in the medical field and, as a college student in 2007, landed a job as a pharmacy technician at the Massachusetts General Hospital's inpatient pharmacy. In 2012, she advanced into a quality assurance role as a quality and compliance technician where her duties consisted of working with nursing to ensure medication safety compliance on the inpatient care units.

Monica began her tenure at the Board in 2014 as a compliance officer. She not only investigated pharmacy cases, but also participated in retail pharmacy inspections, reviewed inspection reports,

and provided general support to the investigative team. She performed this role for two years before advancing to associate executive director.

During the pandemic, there have been many advancements in the role of pharmacy technicians. Under the federal PREP Act, qualified pharmacy technicians may administer Advisory Committee on Immunization Practices and COVID-19 vaccines as well as perform COVID-19 tests. Monica feels that this was a huge step for the profession, but that there is much more to do. She is proud to be part of the group supporting pharmacy technicians and advancing their scope of practice.

“If I had an opportunity to address new pharmacy technicians, I would tell them to never forget how important a technician is to the practice of pharmacy and health care in general. Pharmacies cannot function successfully without us. Never allow anyone to treat you like support staff; the role of a pharmacy technician is bigger than that. Always keep learning; always take any learning opportunity that comes your way.”

Did You Know?

- This is a renewal year for pharmacists. **Renew** your license online before December 31, 2022. Keep your **contact information** (including your email address) current in the Bureau of Health Professions Licensure database since paper reminder notices regarding license renewal are no longer provided. Make sure that you are caught up on your CE!
- As a reminder, prescriptions issued by **nurse practitioners**, pharmacists, and physician assistants may all be filled without a supervising practitioner’s name on them.
- Please review the updated **Data Submission Guide for Dispensers** for details on reporting to the prescription monitoring program.
- Have a system in place to ensure that any PTT and pharmacy technician licenses are always current.
- See guidance from the federal government regarding the obligations of retail pharmacies in ensuring access to **reproductive health care services**.
- Remember to keep naloxone in stock and educate all staff members regarding the **naloxone standing order**. Your patients are counting on you!

Board Staff

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- Michelle Chan, RPh, Quality Assurance Pharmacist
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