



MASSACHUSETTS BOARD OF REGISTRATION IN PHARMACY

newsletter to promote pharmacy and drug law compliance

Contraceptive Prescribing by Pharmacists

State law now authorizes pharmacists to prescribe hormonal contraceptive patches and self-administered oral hormonal contraceptives. Although there is no requirement to prescribe these contraceptive products, **guidance** is available to those pharmacists who choose to do so.

Pharmacists must complete an approved training program, but they do not have to obtain their own Massachusetts Controlled Substances Registration in order to prescribe these products.

Food and Drug Administration (FDA)-approved hormonal contraceptive patches and self-administered oral hormonal contraceptives (regardless of whether the product is over the counter or prescription only) may be prescribed to patients of any age, even if they have not had a previous prescription.

The pharmacist must provide a self-screening risk assessment tool for the patient to complete before issuing a valid prescription for up to a 12-month supply. Refer to the circular letter for all **prescribing requirements**.

Technician Licensing

Anyone wishing to obtain a pharmacy technician license may **apply** after completing one of these four pathways:

1. Pass one of these national certification exams:
 - a. Pharmacy Technician Certification Exam

National Pharmacy Compliance News

A Service of the National Association of Boards of Pharmacy Foundation (NABPF)

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Read National News

- b. Exam for the Certification of Pharmacy Technicians
 - c. Nationally Registered Certified Pharmacy Technician
2. Complete a Massachusetts Board of Registration in Pharmacy-approved training program and then pass a competency exam.
 3. Perform at least 500 hours of on-the-job training as a licensed **pharmacy technician trainee** and then pass a competency exam.
 4. Reciprocate or transfer an existing pharmacy technician license/registration from another US state or jurisdiction.

Board-approved training programs and competency exam details can be found in *Policy 2023-11: Pharmacy Technician Training and Examinations*.

Nonresident Pharmacy Requirements

Although nonresident pharmacy licensing will soon be required, the Board does not currently offer any nonresident licenses, except for **FDA-registered outsourcing facilities**. However, the Board has no plans to offer nonresident licensure to wholesalers, third-party logistics providers, or device manufacturers.

Until licensure is available, a nonresident pharmacy may continue to ship medications into Massachusetts if the pharmacy is licensed and in good standing in the state where it is located but must submit prescription information for Schedule II-V, as well as gabapentin, to the **Massachusetts Prescription Monitoring Program (PMP)**.

Once nonresident licensure goes into effect, at least one designated pharmacist will be required to hold a Massachusetts license. Since it is expected that nonresident pharmacy licensure will go into effect soon, the Board strongly recommends that those pharmacists apply for **reciprocal licenses** as soon as possible.

Reporting information such as change of manager, address, or discipline is not required until after the pharmacy is licensed.

Based on the pharmacy's business model, the Board will also have certain inspectional requirements for licensure. Typical **nonresident retail drug stores** will be required to report the most recent inspection that must have been conducted within two years of the application submission date. Acceptable inspections include those that have been conducted by:

1. the National Association of Boards of Pharmacy® (NABP®), as part of its **Verified Pharmacy Program® (VPP®)**, utilizing the NABP Universal Inspection Form; or
2. a resident state inspector utilizing the NABP Universal Inspection Form; or
3. a resident state inspector utilizing that state's inspection form.

Nonresident sterile compounding pharmacies will have slightly different requirements, including a recent inspection that must have been conducted within one year of the application submission. Suitable inspections include:

1. a satisfactory VPP inspection utilizing the NABP Universal Inspection Form, including the Sterile Compounding Module; or
2. in an NABP-approved Multistate Pharmacy Inspection Blueprint state, a satisfactory inspection conducted by a resident state inspector utilizing either the:
 - a. NABP Universal Inspection Form, including the Sterile Compounding Module; or
 - b. the state's NABP-approved sterile compounding inspection form.

Complex nonsterile compounding is defined by state law as the compounding of drug preparations “which requires special training, a special environment or special facilities or equipment or the use of compounding techniques and procedures that may present an elevated risk to the compounder or the patient.” Examples of compounds that would be considered “complex” can be found in the Board’s **nonsterile compounding policy**. **Nonresident complex nonsterile compounding pharmacies** will be required to provide their most recent inspection report conducted within one year of the application submission date. One acceptable inspection would be a satisfactory VPP inspection utilizing the NABP Universal Inspection Form, which includes the Nonsterile Compounding Module.

Getting to Know the Board Staff – Joanna Chow

In 2019, the Board was fortunate to welcome Joanna Chow as a staff member, starting as an office support specialist and now serving as a pharmacy program analyst. Her duties include providing licensing assistance to applicants and licensees, developing standard operating procedures, and facilitating and organizing materials for the monthly Board meetings.

Joanna already had a strong desire to work in health care when a friend who was working in a hospital pharmacy recommended that she explore a career as a pharmacy technician. It was a career path that appealed to Joanna, and she has been in the pharmacy field ever since. She became licensed as a pharmacy technician with the state in 2008 and obtained her national pharmacy technician certification in 2011.

Joanna brings a wealth of experience to her current role at the Board. Her prior position at the inpatient pharmacy of Massachusetts General Hospital involved filling orders, stocking automated dispensing devices (ADDs) throughout the hospital, and answering the customer service phone line. As a senior technician, she was chosen to help manage the operation of over 150 ADDs by preparing inventory reports for expired medications, reconciling narcotic discrepancies, supporting nurses in resolving missing medication issues, and providing general operational support regarding medication distribution.

Joanna has been instrumental in helping applicants navigate the new licensing system and finds this aspect of her job to be very rewarding. With its updated technology, the new licensing system has created a learning curve for everyone, and Joanna patiently explains the process and sends pharmacy-specific detailed guides to alleviate some of that stress.

Whether she is working with applicants directly or creating business procedures that improve efficiency, Joanna is always happy to contribute – especially in those moments when she knows her work is having a positive impact. One such moment was when a pharmacy technician applicant mailed her a card thanking her for her help with a licensing issue and with the news that she had been hired and had started training.

Joanna is also thankful for the support and respect she receives from Board staff. She is grateful for the mentoring from the pharmacists she works with – some of whom have even become close friends.

Joanna has observed industry-wide trends over the past few years for pharmacy technicians to learn more skills and help advance the profession. As the technician role expands, she envisions that this will improve earning potential and attract others to this career path.

Joanna's advice to pharmacy technicians is to remember that "you play a vital role in health care. Be proud of the work you do. You are not **just** a technician."

Excellent advice, Joanna.

Did You Know?

- Please take advantage of a free one-credit continuing education program offered by the Massachusetts Department of Public Health (MDPH): *Responsive Practice: Providing Health Care and Screenings to Individuals with Disabilities*.
- If your pharmacy does not utilize **free pediatric vaccines** through the MDPH **Immunization Program**, the parents/guardians of patients under 19 years of age must be informed of the potential costs and that their primary care provider can provide vaccines at no charge.
- Recent inspections have found epinephrine auto-injectors, vaccines, and other **medications in vaccination/counseling areas**. Since these are not licensed pharmacy areas, no medications may be stored there.
- Certificates of Achievement for the American Pharmacists Association's (APhA's) *Pharmacy-Based Immunization Administration by Pharmacy Technicians* training program expire after three years. There is a two-hour APhA home study program that **immunizing pharmacy technicians** can take to get an updated certificate.
- **Pharmacist Prescribing for MassHealth Members:** Effective May 1, 2024, pharmacy claims will not be payable if the prescriber is not enrolled in MassHealth. Pharmacists who wish to prescribe drugs to MassHealth members should enroll with MassHealth, which may include

enrolling as a non-billing provider. Pharmacists should visit the [MassHealth website](#) for more information on enrolling or contact MassHealth Customer Service at 800/841-2900, TDD/TTY: 711. Pharmacists must possess a valid National Provider Identifier to enroll.

- All interns, technicians, and pharmacists must have a **valid Massachusetts license** whenever they work or intern in a Massachusetts-located pharmacy. Out-of-state registrations or licenses are not sufficient.
- 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 all at once. Check with the insurer for any questions. Be aware that pharmacists are permitted to make quantity changes for drugs that do not require PMP reporting in accordance with [Board policy](#).

Board Staff

David Sencabaugh, RPh, Executive Director

Monica Botto, CPhT, Associate Executive Director

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Michelle Chan, RPh, Quality Assurance Pharmacist

Jacqueline Petrillo, PharmD, JD, Counsel to the Board

Joanne Trifone, RPh, Director of Pharmacy Investigations

Ed Taglieri, RPh, Pharmacy Substance Use Disorder Program Supervisor

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David Sencabaugh, RPh - Executive Director

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

Megan Pellegrini - Publications and Editorial Manager

250 Washington Street | Boston, MA 02108 | www.mass.gov/dph/boards/pharmacy