

MASSACHUSETTS BOARD OF REGISTRATION IN PHARMACY

*Newsletter to Promote Pharmacy
and Drug Law Compliance.*

Loss or Theft of CS – New Process

With its **new policy**, the Massachusetts Board of Registration in Pharmacy has changed its requirements for reporting lost or stolen controlled substances (CS). Pharmacies must now report only **after** confirming

that a loss has occurred. This is now a **single report**, replacing the previous two-step reporting system. Reports must be submitted within seven days of a confirmed loss.

Reporting

When submitting a mandatory report, please review the **Reporting Requirement Overview** to determine the proper form/pathway to do so. Only the

reporting forms and **links** posted on the Board's website should be used. Outdated reporting forms found in other places on the web may delay receipt of your report.

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Compliance Audits

As a reminder, the Board may audit **pharmacists** to ensure compliance with the annual continuing education (CE) requirement, so be sure to get an early start on your

CE credits! As a refresher, the **CE policy** provides a great overview of all pharmacist CE requirements, including those

Compliance Audits

(cont)

for compounders, immunizers, and collaborative drug therapy management pharmacists.

Before renewing their licenses, **sterile and complex nonsterile**

compounding pharmacies are required to have an inspection each year. Nonresident pharmacy inspection requirements, including Board-approved inspectors, may be

found on the **Pharmacy Application Checklist**. The Board may ask for a copy of this inspection at any time.

Inspectional Deficiencies

Pharmacy investigators conduct over 2,000 pharmacy inspections annually, where they continually observe many of the same deficiencies. The most common inspectional deficiency has been the failure to submit a timely application for a change in a **manager of record (MOR)** or **designated pharmacist-in-charge (PIC)**, or to at least name an **interim MOR or PIC**.

Additionally, when a new or interim MOR assumes responsibility for a Massachusetts-located pharmacy, a CS inventory must be completed for Schedule II-V medications, and the new/interim MOR must complete a **self-inspection** within seven days, as required by **247 Code of Massachusetts Regulations (CMR) 9.19(21)**. It is important for the Board to know who the current responsible pharmacist is, as well as for the new or interim MOR to know

exactly what is involved with their new responsibilities.

Be aware that there is also a **requirement** for each individual MOR to notify the Board by **email** when leaving their position to show that they are no longer answerable for the pharmacy's activities.

Another commonly observed deficiency has been technicians practicing with an expired license. It is important to note that pharmacy technician trainee (PTT) licenses are only valid for one year, during which they are expected to obtain at least 500 hours of on-the-job training. However, PTT license extensions may be granted by the Board upon submission of a "Start a PTT Renewal Application," which can be found after signing into the **online portal**.

Once licensed as pharmacy technicians, individuals must **renew** their licenses every two years, on their birthday. The

Board recommends developing a proactive method of regularly checking license expiration dates to avoid unlicensed practice. Such situations can often disrupt staffing ratios – another common inspectional deficiency – when an individual's license expires, prohibiting them from staffing in the pharmacy until it is renewed.

Lastly, there have been many instances observed in which prescription items such as vaccines and epinephrine, as well as needles and syringes, have been found in an unlocked, unattended immunization area. As a reminder, all prescription items must be properly secured in the pharmacy's licensed space. To ensure ongoing compliance, pharmacies are required by **247 CMR 9.19(21)** to perform regular self-inspections utilizing the **Board's inspection tools**.

Getting to Know Your Board Members – Mark Sciaraffa

Mark Sciaraffa, CPhT, was appointed to the Board in 2023 as the pharmacy technician member. He currently practices as pharmacy technician supervisor of the Massachusetts General Hospital's outpatient pharmacies.

Serving as a Board member has provided opportunities for Mark to connect not only with the other professionals on the Board, but pharmacy professionals across the state and country. As the sole pharmacy technician on the Board, he feels a strong responsibility to represent his chosen vocation and share his experiences.

Mark finds that the diverse practice settings of the individual Board members provide a collective expertise that is an invaluable asset to the Board. Career diversity helps the Board make well-informed decisions while continuing to protect and serve the public.

Differences of opinion among the Board members are addressed professionally and respectfully. All voices are heard, and members are encouraged to share their perspectives before final votes are held.

The Board member experience has provided Mark with valuable firsthand insight into the challenges facing pharmacy and reinforces the importance of thoughtful leadership and collaboration. Mark's advice for those interested in becoming a Board member is to be actively involved in the pharmacy community. Joining local and national organizations such as the Massachusetts Society of Health-System Pharmacists or the American Society of Health-System Pharmacists and regularly attending the monthly virtual Board meetings are great ways to become engaged.

Mark's advice: "Pharmacy is a small world, and professionalism matters. Always conduct yourself with integrity and respect. Most importantly, remember that the patient must always come first – without exception. When we are at work, we must stay focused on the task at hand, recognizing that we may be encountering individuals and families during some of their most challenging moments. In the retail setting, we often say that our window is the last stop on a patient's journey. It is essential that they leave us with a positive experience and the highest level of care and customer service."

Outside of pharmacy, Mark is passionate about cooking, golf, and real estate. He is also a licensed real estate broker and operates his own firm. Mark has two daughters, of whom he is a proud "girl dad."

Did You Know?

- You can ask a pharmacy law practice question at pharmacy.admin@mass.gov.
- You can be notified of changes to Massachusetts regulations and other updates by emailing the Board at pharmacy.admin@mass.gov and asking to be added to the Board's email distribution list.

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