On March 24, 2020, the Massachusetts Commissioner of Public Health issued a Pharmacy Practice Order related to pharmacy practice by retail and institutional pharmacies. The Order as well as supplemental guidance issued by the Board of Registration in Pharmacy (Board) is effective as of March 24. The Order provides:

- **Remote Processing of Prescriptions by Pharmacy Technicians.** Pharmacy technicians may remotely process patient-specific prescriptions on behalf of a Massachusetts licensed pharmacy or health care facility without direct on-site supervision by a Board-licensed pharmacist, provided the pharmacy, pharmacist and technicians comply with the requirements in the Board’s guidance. See COVID-19 Pharmacy Remote Processing Guidance.

- **Implementation of Garb Conservation During Periods of Shortage.** Retail and institutional pharmacies may engage in methods to conserve sterile compounding garb that may not be consistent with USP <797>, provided the pharmacy complies with the requirements in the Board’s guidance. See COVID-19 Pharmacist Garb Guidance.

- **Emergency Authorization to Practice Pharmacy in Massachusetts.** Pharmacists and pharmacy technicians licensed in other states may obtain reciprocal
licensure to practice on behalf of a licensed Massachusetts pharmacy or health care facility during the State of Emergency upon written approval of the Board, and must comply with the requirements in the Board’s guidance. See COVID-19 Pharmacist Emergency Authorization Guidance.

- **Emergency Prescription Refills.** Where a prescription has no remaining refills and the prescriber is not available to authorize a new prescription, pharmacists and pharmacies are authorized to dispense a refill of medication to patients for continuation of therapy for a chronic condition, in accordance with the pharmacist’s professional judgement. Certain conditions, however, must be met, as set forth in the Board’s guidance. See COVID-19 Emergency Prescription Refill Guidance.

- **Central Filling of Prescriptions by Massachusetts Pharmacies.** Retail and institutional pharmacies may engage in central filling activities of patient specific prescriptions or orders, including compounded sterile and complex non-sterile preparations. In addition, a pharmacy engaging in such authorized activities may provide central filling for one or more pharmacies, provided certain requirements are met that are set forth in guidance from the Board. See COVID-19 Central Fill Guidance.

On March 24, the Massachusetts Department of Public Health (DPH) also issued Guidance related to the Commissioner’s March 18 Order Regarding Administration of Certain Medication for Opioid Use Disorder. See our previous reporting of the Order here. The DPH guidance reiterates that pharmacists and pharmacy interns licensed by the Board are authorized to administer medication for the treatment of opioid misuse disorders (MOUD drugs) pursuant to a qualified practitioner’s order, in federally certified and Massachusetts Bureau of Substance Addiction Services (BSAS) licensed opioid treatment programs (OTPs) and acute treatment services that are BSAS licensed and OTP certified (Certified ATS). Per the DPH guidance, the OTPs and Certified ATS where the MOUD drugs are being administered must ensure that medication administration is done in accordance with all federal and state regulations, including that the pharmacist or pharmacy intern is trained in federal confidentiality requirements found at 42 CFR Part 2. In addition, the DPH guidance provides that the OTP or Certified ATS should orient any administering pharmacist or pharmacy intern to all applicable policies and procedures, prior to MOUD drug administration to patients.

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