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THE BOARD OF REGISTRATION IN PHARMACY
ADVISORY ON STAFF RATIOS, DEDICATED TRAINING
PERSONNEL AND PHARMACY INTERN DIRECT
SUPERVISION

The Board would like to remind licensees of the regulations regarding staff ratios and direct supervision of pharmacy interns while providing guidance on the calculation of supervisory ratios using dedicated training personnel.

Supervisory Ratios 247 CMR 8.06(3)(a)

(a) A pharmacist utilizing pharmacy interns, certified pharmacy technicians, pharmacy technicians, and pharmacy technician trainees to assist in filling prescriptions may utilize such support personnel in accordance with the following ratio requirements:

1. 1:4 One pharmacist for a maximum of four support personnel; provided:
 - a. at least one of the four support personnel is a certified pharmacy technician and one is a pharmacy intern; or
 - b. at least two of the support personnel are certified pharmacy technicians.
2. 1:3 One pharmacist for a maximum of three support personnel; provided at least one of the three support personnel is a pharmacy intern or a certified pharmacy technician.

247 CMR 8.01(13): A registered pharmacist preceptor shall not directly supervise more than two pharmacy interns at one time.

All pharmacies must adhere to the staffing ratios set forth by the Board pursuant to 247 CMR 8.06(3) (a) in real time. **Certified technicians may only be counted as “certified” if they are BOTH licensed by the Board AND certified.** If a certified technician is unlicensed, the technician will be counted as a **technician in training** for the purposes of calculating ratio. Technicians in training waiting for licensure,

and licensed technicians awaiting certification examination results must be counted under their current credentials for ratio purposes.

Pharmacy Interns 247 CMR 8.01(2)

(2)The pharmacy internship shall be performed under the direct supervision of a registered pharmacist preceptor.

Pharmacy interns shall be under the direct supervision of the pharmacist preceptor at all times. If the preceptor is not available, s/he shall ensure that the intern is under direct supervision of another licensed pharmacist. Direct supervision is defined as contemporaneous observation and direction of the activities of a pharmacy intern, pharmacy technician, or technician in training by a licensed pharmacist who is on the premises at all times the delegated tasks are being performed; who is fully aware of all delegated tasks being performed; and who is readily available to provide assistance and direction throughout the time the delegated tasks are being performed.

The pharmacist must supervise the pharmacy intern **in person**. Any off-site use of electronic means and communication (i.e. video conferencing, Skype) **DOES NOT** constitute direct supervision of the delegated tasks.

Staff Ratios While Using Dedicated Training Personnel

Licensed pharmacy staff who are directly supervising and training other pharmacy support staff shall not be included in the supervisory ratios set forth in 247 CMR Section 8.06(3) as long as such persons are not independently supporting the pharmacist in any direct professional capacity and are appropriately designated on the published schedule.

Requirements for Dedicated Trainer and Trainee

- “Trainer”
 - Must directly oversee “Trainee” at all times
 - Must wear name badge identifying them as a dedicated pharmacy trainer
 - Shall instruct “Trainee” on duties and responsibilities as defined in their role as a certified pharmacy technician, pharmacy technician, or pharmacy intern.
 - Not counted in staffing ratio
- “Trainee”
 - Shall not act independently of “Trainer”
 - Must wear name badge identifying them as a dedicated pharmacy “Trainee”

- Counted in ratio as a technician in training.
- If either a pharmacy “Trainer” or “Trainee” engages in activities, duties, or responsibilities outside of the “Trainer” – “Trainee” relationship, then both shall be counted towards the pharmacy supervisory ratios set forth in 247 CMR 8.06(3).
- A pharmacy “Trainee” who is doing exclusively computer based training does not need supervision and will not be counted towards the supervisory ratio so long as that “Trainee” is scheduled for computer training for a specified amount of time and does not engage in any activities that support the pharmacist in any direct professional capacity.

Schedule Designation Requirements for Dedicated Trainer and Trainee

- A pharmacy must have established written policies and procedures related to the use of dedicated training personnel.
- Upon request, pharmacy must provide a copy of schedule with “Trainer” and “Trainee” designations.
- The schedule must indicate specific dates and times dedicated training personnel will be used.
- A pharmacy must designate “Trainer” and “Trainee” on pharmacy schedule in advance of the day the training is to take place.
- For exclusively computer based training, pharmacy shall designate on the schedule a pharmacy “Trainee” and note “Computer Training” on the schedule along with the scheduled time that the computer training will take place.

Recommended Actions:

- Pharmacy Managers of Record (MOR) shall ensure that pharmacy preceptors are adherent to the pharmacist to intern supervision ratios (1:2) pursuant to 247 CMR 8.01(13) as well as the 1:4 and 1:3 support staff maximums. 247 CMR 8.06(3).
- Pharmacists shall also ensure that pharmacy interns are under direct supervision at all times, including when performing delegated tasks off-site (i.e. health fairs, vaccination clinics).
- If a pharmacist is not available to directly supervise the intern, the delegated tasks shall not be performed.
- MOR must review staff schedules to ensure compliant ratios of pharmacists, dedicated trainers, pharmacy interns, certified pharmacy technicians, pharmacy technicians and technicians in training are adhered to at all times.

- Pharmacies should consider the utilization of scheduling software that can help prevent instances of non-compliant ratios.
- In the event of sick calls and absences, staff schedules must be adjusted accordingly to maintain compliant ratios.