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.
   c. two of the support personnel are pharmacy interns.

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 8.06(3)(a).

A licensed pharmacist preceptor, or designated licensed pharmacist, may not directly supervise more than two pharmacy interns at one time, while an intern processes, verifies, and/or dispenses prescriptions or medication orders.
A licensed pharmacist preceptor, or designated licensed pharmacist, may directly supervise up to **four** pharmacy interns at one time, if the interns are **not** processing, verifying, and/or dispensing prescriptions or medication orders.

However, a licensed pharmacist must be present at all times when any intern participates in patient or practitioner consultations or recommendations, or any other duty in which an error on the part of an intern could have an untoward impact on patient safety.

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 pharmacy technicians may only be counted as “certified” if they are BOTH licensed by the Board AND certified.** If a certified pharmacy technician is unlicensed, the technician will be counted as a **technician in training** for the purposes of calculating ratio. Pharmacy technicians in training waiting for licensure, and licensed pharmacy 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. 247 CMR 8.01(2)

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.

The pharmacist preceptor must verify that **all students**, both domestic and foreign, are licensed as pharmacy interns **prior to the start of the internship** in any practice setting, including hospital pharmacies.
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).

• Pharmacist preceptors shall ensure that all students are licensed as pharmacy interns prior to the start of the internship.

• 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), while involved in a dispensing function or when performing any duty in which an error on the part of an intern could have an untoward impact on patient safety.

• 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.
Pharmacist & Pharmacy Intern Supervision F.A.Q.:

I am a licensed pharmacist preceptor for an internal medicine APPE rotation, when is it appropriate for me to directly supervise up to four pharmacy interns?

As long as the pharmacy interns are not processing, verifying, and/or dispensing prescriptions or medication orders you may supervise up to four pharmacy interns at one time.

I am a licensed pharmacist preceptor for an internal medicine APPE rotation, can I split my pharmacy interns between multiple medical teams?

Whenever a pharmacy intern performs any patient or practitioner consultations or recommendations, or any other duty in which an error on the part of an intern could have an untoward impact on patient safety, they must have direct oversight from a licensed pharmacist. This does not need to be the preceptor as long as a licensed pharmacist is directly supervising the pharmacy intern(s) on each medical team.

I am a registered pharmacist preceptor for an internal medicine APPE rotation, can I have two pharmacy interns rounding under my direct supervision and have the other pharmacy intern(s) perform independent projects without direct supervision?

This is permitted provided that the pharmacy intern(s) performing the independent projects is not engaging in any patient or practitioner consultations or recommendations, any other duty in which an error on the part of an intern could have an untoward impact on patient safety, or any actions that require a licensed pharmacist.

I am a licensed pharmacist preceptor for an educational APPE rotation, how does this apply to me?

Provided that the APPE rotation does not involve the pharmacy interns processing, verifying, dispensing prescriptions or medication orders, performing patient or practitioner consultations or recommendations, and/or any other duty in which an error on the part of an intern could have an untoward impact on patient safety you may precept up to 4 pharmacy interns.
Pharmacy interns not involved in the aforementioned tasks do not need to be under the direct supervision of a registered pharmacist provided that they are not engaging in any activities that require licensed pharmacist supervision.

I am a licensed pharmacist in a retail pharmacy setting, how does this apply to me?

A licensed pharmacist may only directly supervise a maximum of two pharmacy interns whenever a pharmacy intern processes, verifies, and/or dispenses prescriptions or medication orders.

I am a licensed pharmacist working in an institutional pharmacy setting, how does this apply to me?

A licensed pharmacist may only directly supervise a maximum of two pharmacy interns whenever a pharmacy intern processes, verifies, and/or dispenses prescriptions or medication orders.

I am a licensed pharmacist preceptor for an ambulatory care APPE rotation, how does this apply to me?

As long as the pharmacy interns are not processing, verifying, and/or dispensing prescriptions or medication orders you may supervise up to 4 pharmacy interns at one time.

Whenever a pharmacy intern performs any patient or practitioner consultations or recommendations, or any other duty in which an error on the part of an intern could have an untoward impact on patient safety, they must have direct oversight from a licensed pharmacist. This does not need to be the preceptor as long as it is a licensed pharmacist directly supervising the pharmacy intern(s).

I am a licensed pharmacist preceptor in an office-based setting where pharmacy interns work or come for an APPE rotation, how does this apply to me?

As long as the pharmacy interns are not processing, verifying, and/or dispensing prescriptions or medication orders you may supervise up to 4 at one time.

Pharmacy interns not involved in performing patient or practitioner consultations or recommendations, and/or any other duty in which an error on the part of an intern could have an untoward impact on patient safety do not need to be under the
direct supervision of a licensed pharmacist provided that they are not engaging in any activities that require a licensed pharmacist.

Exceptions to the 1 Pharmacist to 2 Pharmacy Interns Ratio

The below chart contains situations in which a pharmacist may precept up to 4 pharmacy interns at one time provided that the pharmacy interns are not involved in processing, verifying, or dispensing prescriptions or medication orders. This list is not all inclusive.

<table>
<thead>
<tr>
<th>Type of Setting</th>
<th>Pharmacist to Pharmacy Interns Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Internal Medicine or Other Clinical APPE Rotation Based in an Institution</td>
<td>1:4 Ratio*</td>
</tr>
<tr>
<td></td>
<td>• If a pharmacy intern performs any patient or practitioner consultations or recommendations or any other duty in which an error on the part of an intern could have an untoward impact on patient safety, they must have direct oversight from a licensed pharmacist. This does not need to be the preceptor as long as it is a licensed pharmacist directly supervising the pharmacy intern(s).</td>
</tr>
<tr>
<td></td>
<td>• Pharmacy interns may be split between multiple medical teams ONLY if there is a licensed pharmacist directly supervising the pharmacy intern(s) on each team.</td>
</tr>
<tr>
<td></td>
<td>• Pharmacy intern(s) may independently work on projects without direct pharmacist supervision as long as the pharmacy intern(s) performing the independent project(s) is NOT engaging in any patient or practitioner consultations or recommendations, any other duty in which an error on the part of an intern could have an untoward impact on patient safety, or any actions that require a licensed pharmacist.</td>
</tr>
<tr>
<td>Ambulatory Care</td>
<td>1:4 Ratio*</td>
</tr>
<tr>
<td></td>
<td>• If a pharmacy intern performs any patient or practitioner consultations or recommendations or any other duty in which an error on the part of an intern could have an untoward impact on patient safety, they must have direct oversight from a licensed pharmacist. This does not need to be the preceptor as long as it is a licensed pharmacist directly supervising the pharmacy intern(s).</td>
</tr>
<tr>
<td>Educational</td>
<td>1:4 Ratio*</td>
</tr>
<tr>
<td>Office</td>
<td>1:4 Ratio*</td>
</tr>
<tr>
<td></td>
<td>*as long as the pharmacy interns are not involved in processing, verifying, or dispensing prescriptions or medication orders a pharmacist may precept up to 4 pharmacy interns.</td>
</tr>
</tbody>
</table>

Adopted: August 30, 2016
Revised: December 6, 2016
Revised: June 29, 2017