The National Transportation Safety Board has released a safety study, *Drug Use Trends in Aviation: Assessing the Risk of Pilot Impairment* (to read the study, click here). In response, the Board of Registration in Dentistry, the Board of Registration in Nursing, Board of Registration in Pharmacy, and the Board of Registration of Physician Assistants on behalf of the Massachusetts Department of Public Health, Division of Health Professions Licensure, would like to remind licensees who prescribe and dispense prescription drug products of their obligation to discuss with patients the effects of medical conditions and medications prescribed or dispensed.

**Board of Registration in Dentistry:**
- **234 CMR 5.06(1)** requires registered dentists to prescribe controlled substances in conformity with M.G.L. c. 94C, its regulations and all applicable state and federal statutes and regulations pertaining to controlled substances.
- **234 CMR 5.06(4)** requires licensed dentists, prior to prescribing a hydrocodone-only extended release medication that is not in an abuse deterrent form, to thoroughly assess the patient, including an evaluation of the patient’s risk factors, substance abuse history, presenting condition(s), current medication(s) and to discuss the risks and benefits of the medication with the patient.
- **Advisory on the Management of Pain** (adopted March 11, 2009 and amended July 20, 2011) advises that Board-licensed dentists are responsible for developing and implementing evidence-based pain management plans that include comprehensive and on-going pain assessments, appropriate pharmacological and non-pharmacological modalities, and the substantiation of adequate symptom control. Additionally, it advises that dentists maintain effective pain management competencies, as required at M.G.L. c. 94C, § 18(e), that include counseling patients about the side effects of their medications.

For inquiries, after review of the above-referenced information, email dentistry.admin@state.ma.us

**The Board of Registration in Nursing:**
- **244 CMR 4.06** requires those engaged in APRN practice (Nurse Anesthetist, Nurse Midwife, Nurse Practitioner and Psychiatric Clinical Nurse Specialist) to perform health education and counseling for patients.
- **244 CMR 4.07(3)** requires the APRN, prior to prescribing a hydrocodone-only extended release medication that is not in an abuse deterrent form, to thoroughly assess the patient, including an evaluation of the patient’s risk factors, substance abuse history, presenting condition(s), current medication(s) and to discuss the risks and benefits of the medication with the patient.
- **Advisory Ruling 09-01: Management of Pain** provides guidance to Massachusetts nurses with prescriptive authority and specifies that all nurses are responsible and accountable for engaging in the practice of nursing in accordance with accepted standards of care which include, among others, the provision of patient, family/significant other and/or caregiver education; and that APRNs with prescriptive authority will acquire and maintain competencies, as required at MGL c. 94C, § 18(e), that include counseling patients about the side effects of their medications.

For inquiries, after review of the above-referenced information, email nursing.admin@state.ma.us
The Board of Registration in Pharmacy:
- M.G.L. 94C, § 21A and 247 CMR 9.07 Maintaining Patient Records, Conducting a Prospective Drug Utilization Review and Patient Counseling requires a pharmacist to maintain patient records and conduct a prospective drug utilization review (DUR) before each new prescription is dispensed. A DUR may alert a pharmacist to medical conditions or prescriptions that may result in consultation with the patient or prescriber.
- 247 CMR 9.07 (3) further requires that a pharmacist or designee offer the services of a pharmacist to discuss, with all patients presenting new prescriptions, issues that in the pharmacist’s professional judgment are deemed to be significant for the health and safety of the patient, including the patient’s ability to safely operate vehicles and machinery.
- 247 CMR 9.04(8)(e) requires a pharmacist to counsel patients regarding the use of hydrocodone-only extended release medication that is not in an abuse deterrent form.
- 2009-01, Policy on the Management of Pain was implemented to ensure patient access to appropriate and effective pain management. This policy outlines best practices when dispensing controlled substances for pain management.
For inquiries, after review of the above-referenced information, email pharmacy.admin@massmail.state.ma.us

The Board of Registration of Physician Assistants:
- 263 CMR 5.07 Prescription Practices of a Physician Assistant requires a Physician Assistants to follow the guidelines of the Board of Registration in Medicine for the use of Controlled substances for the treatment of pain.
- 2009-01 Policy on Management of Pain outlines pain management practices including counseling of patients about side effects of controlled substances.
- 263 CMR 5.07 (12) Prescribing Hydrocodone-Only Extended-Release Medication. Prior to prescribing a hydrocodone-only extended release medication that is not in an abuse deterrent form, a licensee must assess the patient, including an evaluation of the patient’s risk factors, substance abuse history, presenting condition(s), current medication(s) and a check of the online Prescription Monitoring Program and discuss the risks and benefits of the medication with the patient.
For inquiries, after review of the above-referenced information, email multiboard.admin@state.ma.us