



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
Bureau of Health Professions Licensure
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Board of Registration in Pharmacy

Policy 2020-14: COVID-19 Testing

On March 10, 2020, Governor Charles D. Baker declared a State of Emergency in the Commonwealth to respond to the spread of COVID-19. This policy authorizes pharmacists and pharmacy interns licensed by the Massachusetts Board of Registration in Pharmacy (“Board”) to order, administer, process, read, and report the results of FDA-authorized COVID-19 tests, and is intended to align with the Secretary of Health and Human Services’ Declaration under the PREP Act.

Also, in accordance with the PREP Act, the policy authorizes qualified pharmacy technicians to administer and process FDA-authorized COVID-19 tests. Qualified pharmacy technicians must be certified by a Board-approved national certifying body (i.e. ExCPT or PTCB) or have worked at least 500 hours after being licensed as a pharmacy technician.

Please note carefully, certain allowances and requirements of this policy will terminate when the emergency declaration under the PREP Act terminates. After termination, policy details will be reevaluated.

In order to participate, the following requirements must be satisfied:

- Pharmacy licensees must have a license in good standing.
- Pharmacy interns and qualified pharmacy technicians may only perform testing under the direct, on-site supervision by a Massachusetts licensed pharmacist.
- The decision to order a test must be based on the Massachusetts Department of Public Health (“DPH”) guidance:
<https://www.mass.gov/doc/covid-19-pui-criteria/download>
- Pharmacy licensees must be properly trained in accordance with DPH Clinical Laboratory Program requirements (<https://www.mass.gov/clinical-laboratory-program>) either through a third-party licensed laboratory or an approved testing site.
- Pharmacists and pharmacy interns may order, administer, process, read, and report test results to patients but may not engage in interpretation of any test results.

- Qualified pharmacy technicians may only administer and process COVID-19 tests.
 **Please note that any pharmacy technician or pharmacy technician trainee may observe the collection of self-administered COVID-19 tests provided that they are duly trained and under the supervision of a Massachusetts licensed pharmacist.
- Ordering of tests must be conducted in accordance with policies and procedures developed and maintained by the approved testing site.
- Policies and procedures must be in place to notify the patient of the results, in accordance with DPH guidance:
<https://www.mass.gov/info-details/covid-19-testing-guidance#guidance-for-laboratories->
- If the pharmacist or pharmacy intern orders the test, the pharmacist is responsible for notifying the patient of the results in accordance with DPH guidance:
<https://www.mass.gov/doc/covid-19-testing-ordering-and-resulting-guidance/download>
- In particular, for positive test results, the patient must be:
 - provided with clear instructions to self-isolate;
 - referred to their primary care provider or recommend a provider;
 - informed that they will be contacted by a contact tracer; and
 - urged to answer the phone.
- All test results must be reported to DPH in accordance with 105 CMR 300.000 and the Commissioner's order. For guidance and a reporting template, please request via email: ISIS-ImmediateDiseaseReporting@mass.gov
- Any reporting requirements of the local Board of Health must also be completed.
- Unless otherwise approved by the DPH, no aspects of testing may be conducted within a pharmacy's prescription area or front store, including any consultation / immunization rooms, or other indoor public areas. Tests may only be conducted in a segregated area, such as a parking lot, trailer, or back room that is closed to the public. Consultation with and approval of the local and / or state fire inspector must be conducted prior to establishing a testing location. All waiting areas must ensure appropriate distancing between and among persons being tested. Please review the links below for more details:
<https://www.mass.gov/doc/space-on-clinic-premises-for-covid-19-testing/download>
<https://www.cdc.gov/coronavirus/2019-ncov/lab/point-of-care-testing.html>
- Board licensed pharmacies planning to engage in the ordering, administering, processing, reading, and reporting of FDA-authorized COVID-19 tests must contact the DPH Clinical Laboratory Program for information on licensing, approvals, and other requirements: <https://www.mass.gov/clinical-laboratory-program>
- Pharmacy licensees must institute risk mitigation strategies, including utilizing proper personal protective equipment ("PPE"), to minimize the spread of disease in accordance with the Centers for Disease Control and Prevention ("CDC"), Occupational Safety and Health Administration ("OSHA"), and / or local Board of Health requirements.

<https://www.mass.gov/doc/update-to-defining-aerosol-generating-procedures-and-recommended-ppe/download>

- Guidance regarding serology testing will be provided in the future.

Please direct any questions to:

Board of Pharmacy: Pharmacy.Admin@MassMail.State.MA.US

DPH Clinical Laboratory Program: <https://www.mass.gov/clinical-laboratory-program>