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## Board of Registration in Pharmacy

### Policy 2020-15: Licensee Scope of Practice

The Massachusetts Board of Registration in Pharmacy (“Board”) issues this policy regarding licensee scope of practice. The purpose of this policy is to outline practice requirements and permitted professional duties by pharmacists, pharmacy interns, and pharmacy technicians. This policy is not intended be an exhaustive list of all professional activities Please contact the Board for any scope of practice questions that fall outside this policy.

#### **I. Pharmacist / Intern**

The American Pharmacists Association (“APhA”) describes scope of practice as the boundaries within which a health professional may practice. This allows pharmacists to provide a broad spectrum of services that include but are not limited to managing chronic diseases, performing medication management, administering immunizations, and working in and partnering with health care providers to advance health and wellness. Pharmacists practicing in different settings may have other factors to consider.

Except for final prescription verification, a **pharmacy intern** may perform the same activities as a pharmacist as long as they are under the direct supervision of a licensed pharmacist.

**Pharmacists and interns may not diagnose medical conditions in any setting.**

**Collaborative Drug Therapy Management (“CDTM”):** In order for a pharmacist to order drug-related laboratory tests and prescribe medications, a CDTM agreement with a physician is required. Only pharmacists in an authorized practice setting may enter into a CDTM agreement. Please see links below for CDTM requirements and scope of practice details:

<https://www.mass.gov/doc/247-cmr-16-collaborative-drug-therapy-management/download>

<https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXVI/Chapter112/Section24B1~2>

**Independent Practice:** Pharmacists practicing independently (without an employee / employer relationship with a pharmacy) may not order or possess drugs without a Massachusetts Controlled Substances Registration (“MCSR”) and may not prescribe or direct prescriptions to certain pharmacies. An independently practicing pharmacist may perform compliance packaging services for patients. Sorting a patient’s oral medications within their home from prescription vials into a dose planner is not considered “redispensing.” These pharmacists should obtain informed patient consent before providing services and maintain policies and procedures for their services.

## A. Testing

### 1. Health Promotion Screening:

A pharmacist and pharmacy intern may administer, process, read, and report the results of Health Promotion Screening tests but may not order or interpret any test results, diagnose any medical conditions, or initiate drug therapy based on the results of these tests. For more information on Health Promotion Screening contact the DPH Clinical Laboratory Program:

<https://www.mass.gov/how-to/apply-for-approval-of-health-promotion-screening-laboratory-testing>

### 2. COVID-19:

A pharmacist and pharmacy intern may order, administer, process, read, and report results of COVID-19 tests but may not interpret any test results, diagnose, or initiate drug therapy based on the results of the tests. See the Board’s policy for details:

<https://www.mass.gov/doc/2020-14-covid-19-testing/download>

## B. Telepharmacy

In Massachusetts, the scope of telepharmacy is limited to remote pharmacist clinical activities and verification of final patient-specific products. Please review requirements as outlined in [Policy 2019-01 Shared Pharmacy Service Models Including Central Fill, Central and Remote Processing, and Telepharmacy](#).

1. Unless provided in conjunction with a prescription filled in a Massachusetts licensed non-resident pharmacy, each non-resident pharmacist must maintain a Massachusetts license in order to provide cognitive services to a Massachusetts patient.
2. The practice of having a pharmacy technician fill and dispense a prescription without a pharmacist on site is not currently permitted within Massachusetts.

### **C. Immunizations / Injections**

1. Massachusetts regulations and policies dictate which medications a pharmacist is permitted to administer. After completing the requisite training, pharmacists and interns may only administer:
  - a. vaccines in accordance with Board policy:  
<https://www.mass.gov/doc/2020-11-vaccine-administration-0/download>
  - b. medications for the treatment of mental illness and substance use disorder as specified in the Circular Letter:  
<https://www.mass.gov/doc/circular-letter-dcp-19-06-107-pharmacist-administration-of-medications-for-the-treatment-of/download>
2. FDA-authorized, FDA-licensed, and investigational COVID-19 vaccines may be administered in accordance with Board policy:  
<https://www.mass.gov/doc/joint-policy-2020-13-administration-of-fda-authorized-fda-licensed-and-investigational-covid-19/download>
3. Board-licensed pharmacies may conduct off-site immunization clinics utilizing qualified pharmacy personnel as long as a Massachusetts licensed pharmacist is present.
4. At this time, pharmacists may not administer any other medications or perform skin testing.

### **D. Veterinary Drugs**

1. Pharmacists are prohibited by federal law to recommend a human OTC drug for an animal unless such use is pursuant to a prescription or documentation from a veterinarian.

2. Pharmacists may compound Schedule VI emergency medications for veterinary office use in accordance with Board policy:  
<https://www.mass.gov/doc/joint-policy-2019-06-compounded-emergency-medications-for-veterinarian-use/download>

## II. Pharmacy Technician

- A. Under the supervision of a pharmacist, **all licensed pharmacy technicians (including pharmacy technician trainees)** may:
  1. enter prescription data into a computerized pharmacy system;
  2. take stock bottles from the shelf to fill prescriptions for Schedules III through VI medications;
  3. affix label to a prescription container;
  4. reconstitute a medication;
  5. prepare patient compliance packaging;
  6. compound sterile and non-sterile medications; and
  7. extend the offer to counsel.
  
- B. Under the supervision of a pharmacist, **all licensed pharmacy technicians (EXCEPT pharmacy technician trainees)** may also:
  1. request and accept orally transmitted REFILL authorizations for Schedule III through VI medications if there have not been any changes to the prescription;
  2. assist in the transport of filled and verified Schedule II through VI prescriptions or orders (e.g. delivering filled prescriptions from the pharmacy to a nurse, retrieving the medication from a pickup bin and ringing out the transaction at the register, etc.);
  3. conduct remote processing of prescriptions in accordance with the Board's shared services policy: <https://www.mass.gov/doc/policy-2019-01-shared-pharmacy-service-models-including-central-fill-central-and-remote/download>; and
  4. perform certain activities during the COVID-19 emergency declaration. Qualified pharmacy technicians (as defined in [Board policy](#)) may:
    - a. prepare and administer [COVID-19](#) and [other vaccines](#) in accordance with Board policies; and
    - b. administer and process [COVID-19 tests](#).
  
- C. Under the supervision of a pharmacist, **licensed pharmacy technicians that have national certification (CPhT or ExCPT)** may also:

1. use technology to verify certain inventory management functions  
<https://www.mass.gov/doc/use-of-technology-to-check-inventory-management-activities-performed-by-certified-pharmacy/download>
2. perform perpetual inventory counts with a second licensed nationally certified technician provided that the supervising pharmacist verifies that the perpetual inventory has been completed in accordance with Board regulations;
3. accept NEW orally transmitted Schedule III through VI prescriptions;
4. perform prescription transfers between pharmacies for Schedule VI drugs;
5. assist in the HANDLING of Schedule II medications (e.g. counting pills, working in a vault, performing inventory related tasks, etc.) EXCEPT for any hydrocodone-only extended release medication that is not in an abuse deterrent form;
6. stock and / or perform expiration date checking of Schedule II through VI medications in automated dispensing devices; and
7. perform medication histories.

**D. Pharmacy Technicians may not:**

1. administer medications or vaccines, unless permitted by Board policy;
2. perform final patient dispensing process validation;
3. counsel patients;
4. perform a drug utilization review (“DUR”);
5. resolve clinical issues;
6. contact prescribers concerning drug therapy clarification or modification; or
7. compound, fill, and dispense prescriptions without a pharmacist on site.

**References:**

**APhA:**

<https://www.pharmacist.com/sites/default/files/files/APhA%20-%20PAPCC%20Scope%20of%20Services.pdf>

<https://www.aphafoundation.org/medication-therapy-management>

**ACCP:**

<https://www.accp.com/docs/govt/advocacy/Leadership%20for%20Medication%20Management%20-%20MTM%20101.pdf>

<https://www.accp.com/docs/positions/misc/scopeofpractice.pdf>

**ASCP:**

[https://cdn.ymaws.com/www.ascp.com/resource/collection/28D69F2D-18D9-4EF8-A086-675AB7E4ECD8/Quality\\_Standards\\_and\\_Practice\\_Principles\\_for\\_Senior\\_Care\\_Pharmacists.pdf](https://cdn.ymaws.com/www.ascp.com/resource/collection/28D69F2D-18D9-4EF8-A086-675AB7E4ECD8/Quality_Standards_and_Practice_Principles_for_Senior_Care_Pharmacists.pdf)

**CDC:**

<https://www.cdc.gov/dhds/pubs/guides/best-practices/pharmacist-mtm.htm>

**Pharmacy Times:**

<https://www.pharmacytimes.com/publications/issue/2018/december2018/you-cannot-beat-a-healthy-heart-how-brown-bagging-can-bring-clarity>

<https://www.pharmacytimes.com/publications/directions-in-pharmacy/2015/august2015/compliance-packaging-one-way-to-help-the-medicine-go-down>

**NABP:**

[https://nabp.pharmacy/wp-content/uploads/2018/04/White-Bagging-and-Brown-Bagging-Report-2018\\_Final.pdf](https://nabp.pharmacy/wp-content/uploads/2018/04/White-Bagging-and-Brown-Bagging-Report-2018_Final.pdf)

Please direct any questions to: [Pharmacy.Admin@massmail.state.ma.us](mailto:Pharmacy.Admin@massmail.state.ma.us)