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## Board of Registration in Pharmacy

### Policy 2024-03: Ratios, Intern Supervision, and Dedicated Training Personnel

#### I. Supervisory Ratios

- A. A pharmacist utilizing pharmacy interns, certified pharmacy technicians, pharmacy technicians, and / or pharmacy technician trainees ("support personnel") to assist in filling prescriptions may utilize such support personnel in accordance with the following ratio requirements:
  - i. One pharmacist for a maximum of four support personnel (1:4); provided:
    - a. at least one of the four support personnel is a licensed certified pharmacy technician and one is a licensed pharmacy intern; or
    - b. at least two of the support personnel are licensed certified pharmacy technicians; or
    - c. two of the support personnel are licensed pharmacy interns.
  - ii. One pharmacist for a maximum of three support personnel (1:3); provided at least one of the three support personnel is a licensed pharmacy intern or a licensed certified pharmacy technician.
- B. Salesclerks, messengers, delivery personnel, secretaries, and any other unlicensed persons are not to be included for purposes of determining ratios and may not support the pharmacist in any professional capacity.
- C. In response to the continued public health need for vaccinations, the Board will not be enforcing the above supervisory ratios at pharmacies that are providing vaccination services provided that the following conditions are met:
  - i. a maximum ratio of one pharmacist to six support personnel (1:6) is not exceeded; and
  - ii. at least three of those support personnel are licensed pharmacy interns and / or licensed certified pharmacy technicians.

#### II. Intern Supervision

Because pharmacy interns may perform the same duties as pharmacists, they must be licensed as a Massachusetts pharmacy intern and directly supervised by the pharmacist preceptor unless otherwise specified in this policy. If the preceptor is not available, the intern must be directly supervised by another pharmacist.

For the purposes of this policy, **direct supervision** is defined as contemporaneous observation and direction by a pharmacist who is on the premises at all times; who is fully aware of all duties being performed; and who is readily available to provide assistance and direction.

Per 247 CMR 8.01(16), “a registered pharmacist preceptor **shall not directly supervise more than two pharmacy interns** at one time.” For the purposes of this policy, the Board is providing additional clarification that a pharmacist preceptor:

- A. may directly supervise up to **four** pharmacy interns at one time only if the interns are **not in a pharmacy or engaged** in the filling and / or dispensing of prescriptions or any other duty in which an error on the part of an intern could have an untoward impact on patient safety;
- B. may directly supervise up to **four** pharmacy interns at one time when exclusively conducting immunization clinics;
- C. must be actively present (either virtually or in person) 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;
- D. may allow interns to perform remote processing of prescriptions in the same manner as pharmacy technicians in accordance with [Policy 2021-02: Shared Pharmacy Service Models Including Central Fill, Remote Processing, and Telepharmacy](#); and
- E. must verify that **all pharmacy students**, both domestic and foreign, are licensed as pharmacy interns **prior to the start of the internship** in any practice setting, including hospital pharmacies.

### **III. Dedicated Training Personnel**

Licensed pharmacy staff who are assigned to train other licensed\* pharmacy support staff are not required to be included in the supervisory ratios as long as such persons are not independently supporting the pharmacist in any professional capacity and are appropriately designated on the published schedule.

\*Pharmacy technician trainees (“PTT”) must have a PTT license from the Board prior to training/working in a pharmacy.

## **A. Requirements for Dedicated Trainer and Trainee**

### **i. “Trainer”**

- a. Must directly oversee the “Trainee” at all times.
- b. Must wear a name badge identifying them as a dedicated pharmacy trainer.
- c. Not required to be counted in the staffing ratio unless engaging in activities, duties, or responsibilities outside of the “Trainer” / “Trainee” relationship.

### **ii. “Trainee”**

- a. May not act independently of the “Trainer”.
- b. Must wear a name badge identifying them as a pharmacy “Trainee”.
- c. Must be counted in the ratio as a “pharmacy technician” regardless of whether the trainee is a certified pharmacy technician or intern.

- iii. A “Trainee” who is doing exclusively computer-based training modules does not need supervision and need not be counted towards the supervisory ratio as 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 professional capacity.

## **B. Schedule Designation Requirements for Dedicated Trainer and Trainee**

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

**Supersedes Policy 2021-01**

**Please direct any questions to: [Pharmacy.Admin@mass.gov](mailto:Pharmacy.Admin@mass.gov)**