

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK COUNTY

BOARD OF REGISTRATION
IN PHARMACY

In the Matter of)
Health Care Technology, Inc.)
License No. WD507)
Expired: November 30, 2023)

Docket No. PHA-2023-0134

CONSENT AGREEMENT FOR REPRIMAND

The Massachusetts Board of Registration in Pharmacy ("Board") and Health Care Technology, Inc. ("Licensee"), a wholesale distributor licensed by the Board, license number WD507, do hereby stipulate and agree that the following information shall be entered into and become a permanent part of the Pharmacy's record maintained by the Board:

1. The Licensee acknowledges the Board opened a Complaint against its Massachusetts wholesale distributor license related to the conduct set forth in Paragraph 2, identified as Docket Number PHA-2023-0134 ("Complaint").
2. The Licensee and the Board agree to resolve this Complaint without making any admissions or findings and without proceeding to a formal adjudicatory hearing. The Complaint alleges the following:
 - a. On or about June 2, 2023, while performing a wholesale distributor relocation inspection, a Board Investigator observed that the Licensee had transferred prescription medications (heparin flushes) from their Ashland location and were storing them in an unlicensed facility in Holliston.
3. The Board and Licensee acknowledge and agree that based upon the information described in Paragraph 2 the Board could find the Licensee in violation of the recognized standards of practice warranting disciplinary action by the Board under M.G.L. c. 112, §§ 42A & 61, 247 CMR 7.02(1) and 247 CMR 10.03(1)(a).
4. The Licensee agrees that the Board shall impose a REPRIMAND on its license based on the facts described in Paragraph 2, effective as of the date on which the Board signs this Agreement ("Effective Date").
5. The Board agrees that in return for the Licensee's execution and successful compliance with all the requirements of this Agreement, the Board will not prosecute the Complaint.
6. The Licensee understands that it has a right to formal adjudicatory hearing concerning the Complaint and that during said adjudication the Licensee would possess the right to

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confront and cross-examine witnesses, to call witnesses, to present evidence, to testify on its own behalf, to contest the allegations, to present oral argument, to appeal to the courts, and all other rights as set forth in the Massachusetts Administrative Procedures Act, M.G.L. c. 30A, and the Standard Adjudicatory Rules of Practice and Procedure, 801 CMR 1.01 *et seq.* The Licensee further understands that by executing this Agreement the Licensee is knowingly and voluntarily waiving its right to a formal adjudication of the Complaint.

7. The Licensee acknowledges that it has been at all times represented by Counsel or otherwise free to seek and use legal counsel in connection with the Complaint and this Agreement.
8. The Licensee acknowledges that after the Effective Date, the Agreement constitutes a public record of disciplinary action by the Board subject to the Commonwealth of Massachusetts' Public Records Law, M.G.L. c. 4, § 7. The Board may forward a copy of this Agreement to other licensing boards, law enforcement entities, and other individuals or entities as required or permitted by law.
9. The Licensee understands and agrees that entering into this Agreement is a voluntary and final act and not subject to reconsideration, appeal or judicial review.
10. The individual signing this Agreement certifies that they are authorized to enter into this Agreement on behalf of the Licensee, and that they have read this Agreement.

5/2/24
Date


(signature)

Adam Benson (CEO)
(print name)

David Sencabaugh MB
David Sencabaugh, R. Ph.
Executive Director
Board of Registration in Pharmacy

05/06/2024
Effective Date of Reprimand Agreement

Fully Signed Agreement Sent to Licensee on 5/6/24 by Certified Mail
No. 7022 3330 0001 0813 2306