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Continuity of Care, Including after Closure of Medical Practice

The Massachusetts Board of Registration in Pharmacy has issued [Policy 2023-04: Continuity of Care](https://www.mass.gov/doc/2023-04-continuity-of-care-pdf/download). MassHealth wants to remind pharmacy providers that this policy is in place, as members may be affected by recent medical practice closures. Under this policy, most Schedule VI medications can be dispensed even if there are no remaining refills on a prescription.

This policy states:

Board of Registration in Pharmacy

Drug Control Program

Policy 2023-04: Continuity of Care

Under the following conditions, Schedule VI medications may be provided to ensure patient continuity of care if a prescription has **no remaining refills**, and the pharmacist is unable to obtain prescriber authorization in a timely manner.

A. Using professional judgement, a pharmacist may dispense a quantity not to exceed a 30-day supply or the smallest available unit of use packaging.

B. Only Schedule VI medications that do not require reporting to the PMP may be provided (i.e., gabapentin cannot be provided).

C. The circumstances regarding the continuity of care dispensing must be documented.

D. The pharmacy must develop policies and procedures for continuity of care dispensing.

When a **prescriber-patient relationship has ended** because a prescriber has ceased to practice for any reason, established drug therapy may be continued in order to enable the patient time to establish a relationship with another prescriber. In order to do so, the following conditions must be met:

A. The prescription must have been issued pursuant to a proper prescriber-patient

relationship while the prescriber was still in practice.

B. The prescription is within its expiry period based on its date of issuance (e.g., Schedule III written within 6 months, etc.).

C. The previously filled Schedule III – VI prescription has remaining authorized refills.

D. If multiple Schedule II prescriptions had been issued in accordance with 21 CFR §1306.12, they may be honored.

E. The pharmacist uses their professional judgment to ensure that the dispensing of the medication remains appropriate.

Supersedes Policy 2020-06

Please direct any questions to: Pharmacy.Admin@mass.gov.