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Board of Registration in Pharmacy

Advisory: Prescription Delivery

The Massachusetts Board of Pharmacy (“Board”) has adopted these best practice recommendations for prescription delivery by pharmacies to ensure the safe handling, delivery, and transport of prescription products.

The Board urges all pharmacies to review these recommendations as a high priority and consider implementation of those measures as appropriate. The Board believes that adoption and institution of these practices will result in enhanced pharmacy prescription delivery systems.

General Recommendations

- ✓ Ensure compliance with all federal and state laws and regulations, including licensure in other states, if required.
- ✓ Obtain patient consent for delivery/shipping.
- ✓ Document workflow process including, but not limited to, verifying delivery address and product packaging.
- ✓ Permit only trained pharmacy personnel to package medications and produce delivery labels.
- ✓ Dispense and package prescription medication(s) with proper packaging systems (including, but not limited to, appropriate containers and use of tamper resistant tape).
- ✓ Develop quality assurance methods for the packaging process to assure product viability upon receipt.

Schedule II – V Controlled Substances

- ✓ Require a signature upon delivery.
- ✓ Record and document the tracking number of the package.
- ✓ Include the address of the pharmacy on the label but not the pharmacy name.
- ✓ Review [Data Submission Dispenser Guide](#) for the Massachusetts Prescription Monitoring Program (“PMP”).
- ✓ Review M.G.L. c. 94C § 18 for issuance of Schedule II-V prescriptions in Massachusetts as well as non-resident states.

Medication Returns to Distributors or Reverse Distributors

- ✓ Develop a policies and procedures to address the return of federally controlled substances.
- ✓ Recommend that two employees witness the packaging of the controlled substances.
- ✓ Provide written documentation that the package was picked up by an appropriate vendor.

Refrigerated / Frozen / Other Temperature Sensitive Products

- ✓ Develop policies and procedures to address temperature excursions outside of manufacturer recommended temperature range(s) during delivery.
- ✓ Develop policies and procedures to address the transport of medication (i.e. vaccines for off-site clinics).
- ✓ Provide time-test study, at least twice yearly (summer and winter), to ensure medication stability and safety during transport.
- ✓ Adopt a policy for proper packaging using containers and materials to maintain physical integrity, stability, and sterility (if applicable). When packing medications for transport, use a barrier layer between cold packs and the medication along with a calibrated temperature monitoring device next to the medication.
- ✓ Review regulations at 247 CMR for proper storage of refrigerated medications as well as the Board's refrigerator policy.

Hazardous Products

- ✓ Implement a policy for packaging, transporting, and disposing of hazardous products in accordance to the OSHA and USP <800>.
- ✓ Adopt a policy that requires all hazardous products to be packaged separately using containers and materials (i.e. hazardous bag) to maintain physical integrity, stability, and sterility (if applicable).
- ✓ Develop a list of hazardous drugs, including dosage forms, to aid pharmacy personnel.
- ✓ Review the NIOSH list of hazardous drugs.
- ✓ Provide written instructions regarding spills and proper disposal in accordance with USP <800>.

Delivery to Alternative Locations

- ✓ Contact living facility (i.e. long-term care facility) for any special requirements and to alert them of pending patient-specific delivery.
- ✓ Specialty pharmacies delivering to a retail pharmacy location for patient pick-up may only do so if delivering the final packaged product. The receiving retail pharmacy may not alter the package in any way.

- ✓ Ensure the receiving location is aware of any special storage requirements.

Counseling

- ✓ Provide written drug information and a phone number to call for questions.
- ✓ Include safe and proper use, storage, handling, and disposal.
- ✓ Dispense or recommend proper measuring devices (i.e. oral dosing syringes) with all liquid medications.

Unclaimed Products

- ✓ Notify the recipient that the package has been returned to the pharmacy by the postal office or commercial carrier.
- ✓ Document all returned packages.
- ✓ Re-ship packages according to company policy and procedures.
- ✓ Understand postal office or commercial carrier's policies on returning and/or resending packages.

Lost in Transit

- ✓ Track lost packages through the courier and notify proper authorities, if necessary.
- ✓ Report any lost packages containing federally controlled substances or other drugs with abuse potential to the Board in accordance with the *Loss or Theft of Controlled Substances* policy.
- ✓ Document (manually or electronically) information of the incident including when the package is sent to the wrong address.
- ✓ Consider notifying prescribers of patient delivery losses of federally controlled substances or other drugs with abuse potential.

Pharmacies Utilizing Contracted Drivers

- ✓ Consider annual documented training.
- ✓ Document and retain the driver's delivery log with recipient signatures.
- ✓ Conduct a background check on individual drivers.
- ✓ Implement a policy to ensure that deliveries are not left at the front desk of an assisted living facility or in the hands of a staff member.