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Board of Registration in Pharmacy

Coronavirus Disease 2019 (COVID-19) Frequently Asked Questions

1. Will the Board waive the live CE requirement since so many live programs have been canceled?

Although we will continue to monitor the situation and its impact on live CE availability, bear in mind that there are several online CE offerings that meet the requirement of 5 live CE credit hours per year.

ACPE approved courses are considered "live" as long as the activity provides direct interaction between presenter and learner, including lectures, live teleconferences, workshops, etc. An online course (i.e. webinar) that is approved for live CE credits would be designated with an "L" in its ACPE number.

Please see following link for details: <http://elearning.ashp.org/acpe-designations>

2. Can pharmacies compound hand sanitizer?

Yes. See requirements here:

<https://www.mass.gov/news/covid-19-hand-sanitizer-guidance>

3. Can a pharmacist work more than 12 hours?

During the emergency period, a pharmacist, pharmacy intern, or pharmacy technician may remain on duty for more than 12 hours per day in order to act in the best interest of patients, provided that the time in excess of 12 hours is minimized (to the extent possible) and licensees are able to accurately and safely dispense prescriptions.

4. What about supervisory ratios for interns and technicians?

During the emergency period, the Board of Pharmacy does not intend to take any enforcement action against pharmacies that may be temporarily out of compliance with required supervisory ratios (247 CMR 8.06) provided that there is at least one licensed pharmacist in the pharmacy and the pharmacy is able to accurately and safely dispense prescriptions.

5. Can I refill clozapine without lab results?

In accordance with current practice, pharmacies may refill clozapine prescriptions if current lab results cannot be obtained in a timely manner provided that the pharmacist uses professional judgment after consulting the prescriber. Required lab results must be obtained as soon as possible and the pharmacist must document all pertinent details.

6. Can you waive signature for pickup and delivery to limit the amount of surface touching?

Board regulations do not require any signature at pick up to document either acceptance or refusal of counseling.

Although the Board does not require a signature for delivery, it recommends that some method of acceptance confirmation should be established upon delivery.

If there are 3rd party insurer requirements for a signature at pickup or delivery, please contact the insurer for guidance.

7. Can we request permission to close a pharmacy for more than 1 day, directing patients to other locations and transferring to other pharmacies as needed?

If your organization makes a decision to temporarily close, the Board would require notification via email prior to this occurring with all pertinent details such as the effective date, duration, continuity of care plan, communication plan, etc. Current patients must also be notified of the continuity of care plan.

8. Can I change my hours of operation during the emergency period?

Yes. Use the following form at any time to change your hours:

<https://www.mass.gov/doc/pharmacy-store-hours/download>

9. What if I need to open late, close early, or temporarily close during the day?

To the extent possible, provide methods to notify patients such as signage and emergency contact information. Pharmacies must ensure patient needs are met in a timely manner. Notify the Board as soon as possible via email.

10. Can support personnel (e.g. pharmacy technicians) work remotely?

Guidance is forthcoming.

11. Is it possible to conduct a central fill process for compounded medications during this state of emergency?

Guidance is forthcoming.

12. Is there guidance for how to handle compounding garb shortages?

Guidance is forthcoming.

13. Can I still immunize if my CPR certification expires?

During the emergency period, the Board of Pharmacy does not intend to take any enforcement action against pharmacists who continue to provide immunizations after their CPR certification has expired. Refresh your knowledge using online resources until classes become available.

14. My certification for the sterile compounding facility has expired and I am unable to get a certifier at this time. Can I still compound sterile preparations?

During the emergency period, the Board of Pharmacy does not intend to take any enforcement action against sterile compounding pharmacies for expired certifications provided that environmental monitoring for air and surface has been performed within the previous 30 days and results are within USP action levels,

15. Do I still need to request a follow up prescription for oral Schedule II – V prescriptions?

Yes. At this time, there has been no change to the current requirement for follow up hard copy or e-prescriptions to be sent to the pharmacy within 7 business days. It is the prescriber's responsibility to ensure that the follow up prescription is sent.

Pharmacists need only document on the prescription that a hard copy or e-prescription was requested.

16. Can pharmacists and technicians from other states practice in Massachusetts during the emergency period?

Guidance is forthcoming.

Additional resources:

CDC:

<https://www.cdc.gov/coronavirus/2019-ncov/cases-in-us.html>

Massachusetts DPH:

<https://www.mass.gov/resource/information-on-the-outbreak-of-coronavirus-disease-2019-covid-19>

MassHealth:

<https://www.mass.gov/doc/pharmacy-facts-141-march-12-2020-0/download>

DEA:

<https://www.deadiversion.usdoj.gov/coronavirus.html>

FDA:

<https://www.fda.gov/emergency-preparedness-and-response/mcm-issues/coronavirus-disease-2019-covid-19>

WHO:

https://www.who.int/health-topics/coronavirus#tab=tab_1

NABP:

<https://nabp.pharmacy/coronavirus-updates/>

APhA:

<https://www.pharmacist.com/coronavirus>

ASHP:

<https://www.ashp.org/Pharmacy-Practice/Resource-Centers/Coronavirus>

Please direct any questions and communications to:

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