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Board of Registration in Pharmacy
Drug Control Program

Advisory: Use of Technology to Check Inventory Management Activities Performed by Certified Pharmacy Technicians

I. Purpose and Scope

The Massachusetts Board of Registration in Pharmacy (Board) and Drug Control Program (DCP) have established an advisory regarding the use of technology to verify certain inventory management functions conducted by Board licensed certified pharmacy technicians (CPhT). Only non-patient specific schedule VI medications, excluding those drugs such as gabapentin that must be reported to the Massachusetts Prescription Monitoring Program (MassPAT), are in the scope of this advisory.

II. Requirements

Under the following conditions, a CPhT may transfer schedule VI medication stock from a pharmacy to a patient care area within a Massachusetts licensed health care facility, without prior verification from a pharmacist.

A. The pharmacy should determine if any approvals or other notices are required by the Massachusetts Department of Public Health (DPH) Bureau of Healthcare Safety and Quality (BHCSQ) and / or the Drug Control Program (DCP) with respect to this process. Licensees are required to comply with all federal and state laws, regulations, and policies.
B. Remove medications from an electronic inventory management system using barcode scanning or other electronic validation without further manipulation (e.g. manufacturer's sealed, original packaging, etc.).
C. Load medication into an Automated Dispensing Device (ADD) using barcode scanning or other electronic validation.
D. A licensed health care professional must use an electronic device with bar code scanning or other electronic validation for product verification at time of administration.

III. Recommendations

A. The pharmacy should have policies and procedures in place regarding the process.
B. For quality assurance purposes:
    i. Random audits should be conducted at various points in the stocking process. For instance, checking medications after removal from the inventory management system or those that have been stocked in an ADD.
    ii. Data should be collected to track and trend accuracy and compliance.

Please direct any questions to:

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