



The Commonwealth of Massachusetts
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Board of Registration in Pharmacy

COVID-19 Pharmacy Practice Updates

With the Governor's State of Emergency declaration having ended on June 15, 2021, certain practice allowances and requirements have also ceased as described below. Please be aware that other practice allowances identified in this document may not be permanent and also come to an end in the near future and will be communicated accordingly.

1. In response to the public health need for vaccinations, the Board will not be enforcing the supervisory ratios set out in 247 CMR 8.06(3) at licensed pharmacies that are providing vaccination services provided that the following conditions are met:
 - A maximum ratio of 1 pharmacist to 6 support staff is not exceeded; and
 - at least 3 support staff are interns and / or certified licensed pharmacy technicians.

Any pharmacies that do not administer vaccinations but would like the Board to consider their specific circumstances may contact the Board.

2. Due to staffing shortages, the Board does not intend to take enforcement action against pharmacies that perform and reconcile perpetual inventory counts at least every 30 days as long as back-counts are performed after each prescription is filled.
3. The Board has returned to the following pre-pandemic requirements:
 - 12 hour workday maximum ([247 CMR 6.02\(9\)\(c\)](#))
 - cannot compound copies of commercially available drugs ([Policy 2020-02: Compounding Copies of Commercially Available Drugs](#))
4. Pharmacy practice emergency orders and guidance have been terminated and pre-pandemic requirements must be followed:
 - pharmacies may no longer compound hand sanitizer without a patient-specific prescription

- prescriber has 7 days to provide follow-up paper / electronic prescriptions for oral Schedule II through V prescriptions ([105 CMR 721.060 \(B\)](#))
- restock emergency kits in long term care facilities within 48 hours ([105 CMR 150.008\(E\)](#))
- ID requirement for picking up a federally controlled substance or gabapentin prescription ([105 CMR 700.012](#))

NOTE: Identification is not needed to pick up prescriptions for federally scheduled controlled substances in certain circumstances. However, the individual must print their name and address on the reverse side of the prescription and sign it. In the case of an electronic prescription, they must provide an electronic signature. Review the [Data Submission Dispenser Guide](#) for details.

5. The Division of Insurance has issued this [bulletin](#) that addresses such things as early refills and signature requirements.
6. Authorization remains in place for [qualified pharmacy technicians](#) to continue to prepare and administer certain vaccines pursuant to the PREP Act and as provided for in Board policy.
7. Authorization remains in place for pharmacists, interns, and qualified pharmacy technicians to administer any FDA-licensed or FDA-authorized [COVID-19 vaccines](#).
8. See the Board's policy for details outlining requirements for the conducting of FDA-authorized [COVID-19 tests](#).

Please direct any questions and communications to:
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