



Jeremiah W. (Jay) Nixon
Governor
State of Missouri

Jane A. Rackers, Division Director
DIVISION OF PROFESSIONAL REGISTRATION

Department of Insurance
Financial Institutions
and Professional Registration
John M. Huff, Director

MISSOURI BOARD OF PHARMACY
3605 Missouri Boulevard
P.O. Box 625
Jefferson City, MO 65102-0625
573-751-0091 PHONE
573-526-3464 FAX
800-735-2966 TTY Relay Missouri
800-735-2466 Voice Relay Missouri

Kimberly A. Grinston
Executive Director
www.pr.mo.gov/pharmacists
e-mail: MissouriBOP@pr.mo.gov

TO: Missouri Class B Pharmacy Permit Holders

FROM: Missouri Board of Pharmacy

RE: Medication Therapy Services Certification Requirements

DATE: May 20, 2013

The Board has received questions from licensees asking if a medication therapeutic services (MTS) certificate is required for pharmacists initiating/modifying a patient's drug therapy within a licensed hospital. The Board does not have jurisdiction over inpatient hospital pharmacy practice. However, § 338.010.9 provides:

Any pharmacist who has received a certificate of medication therapeutic plan authority may engage in the designing, initiating, implementing, and monitoring of a medication therapeutic plan as defined by a prescription order from a physician that is specific to each patient for care by a pharmacist.

In accordance with § 338.010.9, the Board recognizes and agrees with the following statement from the Department of Health and Senior Services regarding MT certificate requirements:

Prior to pharmacist MTS authority, pharmacists in hospitals performed many MTM functions, including making recommendations for modifying medication therapy. However, pharmacists did not have authority to order medications, and those modifications had to be given directly or authorized by a person who had statutory authority to prescribe. This could be accomplished appropriately through the use of verbal orders from a physician to the pharmacist based on the pharmacist's recommendations.

Our hospital licensing rule 19 CSR 30-20.100(33) states who may order medications:

19 CSR 30-20.100(33) Medication orders shall be initiated or modified only by practitioners who have independent statutory authority to prescribe or who are legally given authority to order medications. That authority may be given through an arrangement with a practitioner who has independent statutory authority to prescribe and who is a medical staff member. The authority may include collaborative practice agreements, protocols or standing orders and shall not exceed the practitioner's scope of practice. Practitioners given this authority who are not hospital employees shall be

approved through the hospital credentialing process. When hospital-based agreements, protocols or standing orders are used, they shall be approved by the pharmacy and therapeutics or equivalent committee.

This language was written to mean that certain licensed healthcare practitioners, including physicians, dentists, podiatrists and optometrists, are authorized by their professional practice acts to independently prescribe medications within their scope of practice. Other persons may be given legal authority to order medications in a hospital by a recognized authority such as their professional practice act, a rule or interpretation by their professional licensing agency. This language was written in 1995 subsequent to earlier nurse collaborative practice authority, and was intended to recognize other health care professionals in the future.

Since 1995, both PAs and pharmacists have received statutory authority that allows them to order medications. Modification of therapy is defined in the BOP MTS rule to include selecting and implementing new medication therapy, and even though the rule is likely not applicable in hospitals, we recognize this interpretation as a standard of practice. Because pharmacist statutory authority for MTS, and therefore the authority to order medications, is based on a certificate, we agree with BOP that a pharmacist must have a certificate to modify/order medications, including in hospitals. We believe this is a pharmacist licensure issue, and we require pharmacists to be properly licensed to practice in hospitals.

Currently a certificate would be expected when DHSS staff are performing surveys if there is a question regarding pharmacist licensure to modify/order medications by protocol.

Additional information regarding medication therapy certificate requirements can be found on the Board's website at <http://pr.mo.gov/pharmacists-medication-therapy.asp>. Questions regarding hospital practice and DHSS requirements should be addressed to Bert McClary at (573) 751-6321.