

CERTIFICATE OF MEDICATION THERAPEUTIC PLAN AUTHORITY Q&A

In 2007, the Missouri legislature amended [§ 338.010](#) of the Revised Statutes of Missouri to grant Missouri pharmacists authority to perform “medication therapy services” after obtaining a *certificate of medication therapeutic plan authority* issued by the Board of Pharmacy. The Board is scheduled to begin issuing certificates on **August 30, 2012**. This Q&A provides basic compliance information on the new requirements and the new *certificate of medication therapeutic plan authority*:

This Q&A is provided for informational purposes only and is solely applicable to persons and entities under the jurisdiction of the Missouri Board of Pharmacy. Licensees should review the full text of the pending rules to ensure compliance. This document does not constitute a rule statement of general applicability or binding law. In the event of a conflict or inconsistency, duly promulgated or enacted state or federal law shall control. The Board expressly reserves the right to revise the contents as deemed appropriate or necessary. Questions regarding this document may be addressed to the Board office.

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1. What are “medication therapy services” (MTS)?

Pending rule [20 CSR 2220-6.060\(1\)\(F\)](#)¹ defines “medication therapy services” as “the designing, initiating, implementing, or monitoring of a plan to monitor the medication therapy or device usage of a specific patient, or to enhance medication therapeutic outcomes of a specific patient, by a pharmacist who has *authority to initiate or implement a modification of the patient’s medication therapy or device usage pursuant to a medication therapy protocol.*”

2. Is MTS the same as Medication Therapy Management (MTM)?

No. As commonly defined, MTM includes a group of pharmacist provided services designed to optimize patient therapeutic outcomes. “Medication therapy services” as used in [§ 338.010](#), RSMo, refers to those medication therapy management services performed by pharmacists who have authority to initiate or modify a patient’s drug/device therapy.

3. Why is it called MTS and not MTM?

The General Assembly included the term “medication therapy services” in [§ 338.010](#), RSMo, when the statute was revised. The Board’s rules reference MTS to be consistent with the statutory language.

4. What do I need in order to perform medication therapy services?

Pharmacists must hold a certificate of medication therapeutic authority (MT certificate) issued by the Board.

5. What are the requirements for a MTS certificate?

Pharmacists must have a current and active Missouri pharmacist license and must hold, or have completed, one of the following:

- A PharmD degree from an ACPE accredited school; OR
- A post-graduate medication therapy certificate course or program accredited or granted by the ACPE, American Society of Health-System Pharmacists, American Society of Consultant Pharmacists or the American Pharmacists Association; OR
- A current certification from the Board of Pharmaceutical Specialties, the Commission for Certification in Geriatric Pharmacy, or the National Certification Board for Diabetes Educators; OR
- A qualifying post-graduate medication therapy certificate course.

6. Do I need a MTS certificate to perform “medication therapy management” (MTM)?

No, a certificate is only required if you are engaged in initiating or modifying drug therapy/device usage, or have authority to initiate or modify drug therapy/device usage.

7. Pharmacists have been doing this for years, what’s changed?

Prior to 2007, Missouri law did not formally recognize a pharmacist’s ability to initiate or modify drug therapy/device usage. Section [338.010](#) and the pending rules will officially allow this practice for pharmacists who hold a MT certificate issued by the Board.

8. Do I need a certificate to counsel patients or for Medicare Part D MTM services?

No. Under [§ 338.010](#), these activities are within the scope of the practice of pharmacy and can be performed by any Missouri licensed pharmacist. A MTS certificate is only required if a pharmacist is engaged in or has authority to initiate or modify drug/device therapy through a protocol with a physician.

9. Do the new rules apply to hospital inpatient practice?

¹ The MTS rules referenced in this Q&A are in the final stages of rulemaking and are currently pending ([20 CSR 2220-2.060](#), [20 CSR 2220-2.080](#) and [20 CSR 2220-2.090](#)). The Board anticipates the pending rules will be effective on August 30, 2012. The pending rules are available now on the Board’s website.

The Board does not have jurisdiction over hospital inpatient pharmacy practice and is legally reviewing the applicability of the pending rules to pharmacists practicing in a hospital inpatient setting. In the interim, licensees should consult with legal counsel to ensure compliance.

10. Will pharmacy technicians need a MTS certificate?

No. Only pharmacists can provide medication therapy services as defined in the rules.

11. Will intern pharmacists need a certificate?

No. Intern pharmacists may assist in the provision of MTS services under the supervision of a Missouri licensed pharmacist. However, initiations or modifications of drug therapy/device use may only be performed by a Missouri licensed pharmacist.

12. What about pharmacy residents?

As licensed pharmacists, pharmacy residents must satisfy all MTS certificate requirements. Please note, however, the Board does not have jurisdiction over hospital inpatient pharmacy practice and is legally reviewing the applicability of the new MTS rules to pharmacy residents practicing in a hospital inpatient setting. In the interim, applicants should consult with legal counsel to ensure compliance.

13. Do I need to take additional courses/training if I have a PharmD?

No. A PharmD degree may be used to qualify for a MT certificate. Licensees are encouraged, however, to take advantage of available educational and training opportunities.

14. Will I need to take additional courses/training if I have a bachelors degree in pharmacy?

Possibly. To qualify for a MT certificate, [§ 338.010.7](#) requires additional post-graduate training after a bachelors degree. Additional training may not be needed if you've already completed a certificate course/training program designated in [20 CSR 2220-6.070](#) or if you hold any of the certifications identified in the pending rule.

15. If I have a bachelors degree, can I use my experience to qualify for a MT certificate?

No. Section [338.010.8](#), RSMo, specifically requires additional post-graduate training after a bachelors degree.

16. Why is the Board treating pharmacists with a bachelors degree differently?

The 2007 legislation specifically included language that requires post-graduate training beyond a bachelors degree to qualify for a MT certificate. The language was not proposed by the Board and can only be changed through the legislative process. The Board is in the process of reviewing legislative options and will notify licensees of any changes.

17. Can I use a medication therapy course that I've already taken?

Yes, previously taken courses that comply with the rule may be used.

18. What about medication therapy courses/programs that were not accredited or granted by ACPE, ASHP, ASCP or APhA?

As provided in pending rule [20 CSR 2220-6.070\(2\)](#), alternative medication therapy certificate courses may be used to qualify for a MT certificate if the course/program included training on:

- Assessing patient specific data and issues;
- Establishing medication therapeutic goals or medication related action plans for identified medication conditions and medication related concerns;
- Assessing and addressing adverse reactions and adverse drug events;
- Modifying and monitoring medication regimens;
- Improving patient care and outcomes through medication therapy services;
- Evaluating treatment progress;

- Assessing and monitoring pharmacokinetic and pharmacodynamic changes in medication regimen reviews;
- Medication reconciliation;
- Drug utilization review;
- Applicable state or federal law;
- Formulating and documenting personal medication records;
- Documenting clinical outcomes;
- Interpreting, monitoring, ordering, and assessing patient test results; and
- Patient education and counseling.

To qualify, the course must issue an official medication therapy certification. Traditional continuing education completion statements will not be accepted.

19. Will alternative certificate courses/programs have to be pre-approved by the Board?

No. Alternative certificate courses/programs do not have to be pre-approved. However, licensees must submit proof that an alternative course/program meets the requirements of [20 CSR 2220-6.070](#) with the licensee's certification application (i.e.- brochure, syllabus or course outline). Incomplete applications will be returned.

Note: Medication therapy certificate courses or programs accredited or granted by ACPE, ASHP, ACPA or APhA or provided by an ACPE continuing pharmacist education provider are deemed to qualify with the rule, provided proof of completion/certification is submitted.

20. Are there any courses available now?

Information regarding ACPE, ASHP, ACPA or APhA courses/programs can be found via an online search. Additionally, several Missouri organizations have expressed an interest in developing alternative certificate courses/programs. The Board may post additional information on available courses on its website in the future.

Note: These programs/groups are not approved, endorsed or sponsored by the Board.

21. When will the Board start issuing MTS certificates?

The Board anticipates the pending rules will be effective on August 30, 2012, and will begin issuing certificates on August 30th. Applications are available online now at <http://pr.mo.gov/pharmacists-forms.asp>.

22. Can I submit my MTS application before August 30th?

Yes. However, applications cannot be legally approved until August 30th.

23. How long will it take to process my application?

Approximately 1-2 weeks after a completed application is received. Processing times may vary depending on volume.

24. How much is the MTS application fee?

\$ 50

25. Will the Board issue a separate MT certificate?

No. Once you're approved, the Board will reissue your current pharmacist license with "Medication Therapy Services" designated on the license. This designation will officially authorize a pharmacist to perform medication therapy services as defined by rule.

26. Can I apply for a MT certificate when I renew my Missouri pharmacist license?

No. A separate application and fee must be filed.

27. Can I apply for a MT certificate while my Missouri pharmacist license application is pending with the Board?

Yes. However, a separate MT certificate application and fee must be filed. An MT certificate will not be granted until your Missouri pharmacist license is approved. *Note: MT certificate application fees will not be refunded if your pharmacist license is denied/not issued.*

28. When do I renew my MTS certificate?

MTS certificates will be renewed biennially at the same time as your Missouri pharmacist license. For example, MTS certificates issued in 2012 can be renewed in 2014 when you renew your Missouri pharmacist license.

29. Where can I find the new rules?

The new rules will be officially published in the Missouri Register on July 16, 2012. Full copies of the pending rules are available now on the Board's website.

30. When do the new rules go into effect?

August 30, 2012.

31. Who should I call if I have questions?

Inquiries can be e-mailed to pharmacist@ pr.mo.gov or directed to (573) 751-0091.

Quick MTS Facts

- A MTS certificate from the Board is required to initiate, alter or modify medication therapy.
- Pharmacists with an MTS certificate can only perform MTS services under a protocol with a Missouri licensed physician.
- Pharmacists cannot initiate, alter or modify any controlled substance prescription.
- Pharmacists **cannot diagnose** or perform any activity that might be deemed the practice of medicine. Only a duly licensed physician may practice medicine as defined by Missouri law.

*****Licensees should review [§ 338.010](#) and the pending MTS rules in their entirety to ensure compliance.*****