



Louisiana Board of Pharmacy

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MEMORANDUM

To: Licensees & Interested Parties

From: Malcolm J Broussard, Executive Director

Date: April 14, 2020

Re: COVID-19 Guidance Information – Therapeutic Interchange

While Louisiana pharmacy law and rules provide guidance relative to **generic interchange** (*substitution by a dispensing pharmacist of one brand of a drug product for a different brand of the same drug product prescribed*), there is no guidance in that law or rule relative to **therapeutic interchange** (*substitution by a dispensing pharmacist of one drug product for a different drug product prescribed*).

The Board is aware of a September 2000 communication from the Louisiana State Board of Medical Examiners which opines that therapeutic substitution by a pharmacist without prescriber consent constitutes the unlicensed practice of medicine. However, the Board is also aware that hospitals and health systems with medication formulary systems may employ therapeutic interchange as one of their strategies to manage medication use, and further, have done so for decades. Therefore, the Board's law and rule are deliberately silent on the issue of therapeutic interchange and we have routinely privately cautioned those hospitals to ensure their formulary system policies and procedures are approved by the facility's medical staff governance structure.

One of the many consequences of the current public health emergency is an increase in the number of drug shortages. We have received many requests from pharmacists in community pharmacy practice settings suggesting the benefit to public health of allowing pharmacists to perform therapeutic interchange for drugs in shortage. With the support of the La. Dept. of Health following a consultation with the medical board, the medical board [agreed](#) to waive any restrictions on therapeutic interchange by pharmacists during the public health emergency "*as long as those substitutions ensure the health and stability of patients by providing continuous access to essential medications.*"

The Board encourages pharmacists contemplating therapeutic interchange procedures to use sound professional judgment, exercise your professional discretion, and take care of your patients.

NOTICE: In compliance with Act 256 of the 2019 Louisiana Legislature, the Board gives public notice that any information submitted to the Board may become public record unless specifically exempted by the Public Records Law, R.S. 44:1 *et seq.*

NOTICE: In compliance with Act 655 of the 2018 Louisiana Legislature, the Board gives notice to its licensees and applicants of their opportunity to file a complaint about the Board's actions or procedures. You may submit such complaints to one or more of the following: (1) Louisiana Board of Pharmacy; 3388 Brentwood Dr., Baton Rouge, La 70809; 225.925.6496; info@pharmacy.la.gov (2) Committee on House & Governmental Affairs; La. House of Representatives; PO Box 44486; Baton Rouge, LA 70804; 225.342.2403; h&ga@legis.la.gov (3) Committee on Senate & Governmental Affairs; La. Senate; PO Box 94183; Baton Rouge, LA 70804; 225.342.9845; s&g@legis.la.gov