

Title: COVID-19 Public Health Emergency:
Therapeutic Interchange by Pharmacists

Policy No. I.D.20

Issued: 04-13-2020
Ratified: 05-27-2020
Extended: 11-18-2020

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1. The Board office received inquiries from several pharmacists asking about options for therapeutic interchange. One of the consequences of the public health emergency is the increasing incidence of drug shortages. Pharmacists were suggesting that when the prescribing physician is not available to change a previously issued prescription for a drug in shortage, then patient drug therapy was delayed. Pharmacists suggested the Board issue some type of authority for pharmacists to perform therapeutic interchange.
 2. 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*]; however, there is no guidance relative to **therapeutic** interchange [*substitution by a dispensing pharmacist of one drug product for a different drug product prescribed.*]
 3. 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 physician consent constitutes the unlicensed practice of medicine. Although the Board is aware that therapeutic interchange has been used in hospital pharmacy practice for several decades, the Board has routinely cautioned those pharmacies to ensure their medication formulary systems and procedures are approved by the facility's medical staff leadership. The Board's rules are deliberately silent on the issue of therapeutic interchange.
 4. Working with the Board and the Dept. of Health, the Board of Medical Examiners 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."
 5. The Board President directed staff to communicate the waiver from the Board of Medical Examiners, and to request pharmacists to use sound professional judgment in making such interchange decisions.
 6. During their November 18, 2020 meeting, the members voted to extend this interim policy until the conclusion of the public health emergency unless terminated sooner.