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.