



**Department of Pharmaceutical & Nutrition Care**

981090 Nebraska Medical Center

Omaha, NE 68198-1090

Board of Pharmacy  
State of Nebraska

January 13, 2014

*Dear Board of Pharmacy Members,*

*Problem:*

*A safety and regulatory question has arisen regarding e-prescribing and electronic health record options. The electronic health record offers the option to allow providers to reprint prescriptions for circumstances where the prescription did not generate as expected (ie paper jam, toner issues, etc.). This functionality is currently enabled at our facility. Prescriptions which are reprinted will carry the same medication order number as the original print. This offers the opportunity for multiple prescriptions to carry the same medication order number. The prescribing providers would like to maintain reprinting ability for the situations of printer malfunction, as the lack of having this requires redundant medication order entry. Re-entering the medication information on a new prescription is the alternative workflow that would generate a unique medication order number. The DEA, National Council for Prescription Drug Programs (NCPDP), and state pharmacy inspectors have all be contacted for opinion on this issue, and per these conversations there is currently little language in the law located that requires a unique medication order number. The Department of Pharmaceutical and Nutritional Care leadership carry philosophically believes that reprinting creates a risk of diversion, because there is no ability to direct electronically generated prescriptions to a secure printer. On the other hand, the workflow to support disabling the reprinting feature may introduce access to care issues due to the potential for prescriptions to be suspended and not delivered to the patients. We are seeking Board of Pharmacy membership opinion.*

*Details:*

*The Nebraska Medical Center encourages prescribers to e-prescribe, however paper prescriptions are still required for pharmacies unable to receive e-prescriptions and controlled substances. As noted, the prescribers feel that reprinting is a nice feature to overcome printer hardware issues, however it has also been discovered that reprinting prescriptions that were misplaced has potentially enabled diversion in a few cases. There has been a challenge in locating firm language that requires a unique order number to appear on the face of prescriptions. The Epic technical team has been consulted in request of having the provider reprint of a prescription generate a new and unique medication order number. This is not currently possible. Epic has developed a report that is available to monitor reprinting. This report revealed 150 reprints of controlled substances in a 12 month time period. In this report we are able to view the ordering and authorizing provider of the medication prescription, as well as the individual that reprinted the prescription. This would allow for identification of pattern behavior over time. Of course,*

*the alternative solution would be to disable reprinting abilities. The physician leadership has requested a robust review of regulations prior to disabling this functionality as it will cause redundant workflows and inefficiencies for prescribers as well as safety concerns noted when reprinting is needed.*

*Review of state and federal law did not reveal direct language on this topic. Review with representative from DEA and discussion with Nebraska state inspector reaffirmed that there is not legal language requiring a unique medication order number, but rather the prescribing facility should have a process for preventing diversion. NCPDP provided the most guidance we were able to locate. Lynn Gilbertson, NCPDP's Vice President of Standards response included the following:*

- *Use special paper (available blank) which prohibits washing, copying, and other alterations. The special paper can be used even if not required in a state. (NCPDP has guidance on tamper resistant [http://www.ncdp.org/public\\_documents.aspx#trpp](http://www.ncdp.org/public_documents.aspx#trpp) )*
- *The printed prescriptions could have the prescription order number, perhaps in highly visible manner, it could have a micro printed line ("This is an original prescription"), printing some protection features on the prescription.*

*The Nebraska Medical Center does print a medication order number on the face of the prescription and currently prints prescriptions on standard letter paper using a micro printed line that provides directive to the retail pharmacy that it is an original prescription.*

#### *Request for Board Opinion*

*The Nebraska Medical Center and affiliates operating in the Epic electronic medical record currently are exploring the following options regarding prescription medication order numbers:*

- *Allow reprinting ability with creation of an audit trail allowing the organization to track original prescriptions generated by each prescriber via the reporting mechanism described.*
- *Remove reprinting ability*

*We are seeking the Board of Pharmacy's opinion to assist in this decision process, as it is important to ensure that our review has been all inclusive and our process is in alignment with regulatory standards.*

*Sincerely,*

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