MEDICAL ASSISTANCE BULLETIN

COMMONWEALTH OF PENNSYLVANIA * DEPARTMENT OF PUBLIC WELFARE

SUBJECT Pharmacy Record Keeping Requirements	**BY** **Robert S. Zimmerman, Jr., M.P.H.** Deputy Secretary for Medical Assistance Programs
NUMBER:	19-97-10
ISSUE DATE:	August 4, 1997
EFFECTIVE DATE:	August 4, 1997

PURPOSE:

The purpose of this bulletin is to remind pharmacies of the record keeping requirements when furnishing services to long term care residents or mail order clients, as stated in 55 PA Code § 1101.66 (b), (c), and (d).

SCOPE:

This bulletin applies to all pharmacies enrolled in the Medical Assistance Program, especially those which directly or indirectly service health care facilities such as nursing facilities, intermediate care facilities for the mentally retarded and assisted living, personal care facilities, and pharmacies which service mail order clients.

BACKGROUND:

During the past few years, the Department has identified major problems with pharmacy providers' record keeping practices. These problems occur primarily in pharmacies which provide services to health care facilities as listed above, and pharmacies which engage in mail-order pharmacy business.

There is a growing practice within the pharmacy community to process new and refill medication orders without proper prescriber authorization, or any interaction with the health care facility. Processing a medication order without proper authorization, as well as the process of unauthorized "cycle fill", presents the problem of medications being dispensed on the second or subsequent months without a prescriber's written and/or signed order in the pharmacy. This often occurs when the pharmacy, based on the resident's current medication orders, supplies the nursing facility with unsigned prescriber order sheets, and then dispenses medications before it receives the signed prescriber's order. This problem is compounded when a pharmacy receives hard copy signed prescription or prescriber order, enters the information into the computer and discards the hard copy. As a result of this practice, pharmacists cannot recheck the original prescription or prescriber order for accuracy before filling the prescription, nor prove that the prescription was filled as ordered. At times, medications have been dispensed to residents of health care facilities without a current order. This also leads to changed or discontinued orders being missed.

While the Department recognizes the advantage of current electronic data systems and being able to process, label and bill a prescription or medication order more rapidly using computers, it is concerned that failure to maintain the original hard-copy prescription or practitioner order may lead to incorrect dispensing of medication, a danger to the patient and improper use of public funds.

PROCEDURE:

Prior to dispensing any medication, the pharmacy MUST receive authorization from the prescriber or his/her designee. In all cases, pharmacies shall maintain hard copy (paper trail) prescriptions and/or signed and dated prescriber orders as required by Medical Assistance regulations 55 PA Code § 1101.66 (b), (c) and (d). A paper trail includes carbon copies or facsimile transmissions or the original hand written orders a pharmacist transcribes when taking a telephone order from health care facilities and orders for mail order medications. In most cases, if the facility requests a medication order on behalf of the physician, the Department has recognized that as a medication order.

Failure to comply with Medical Assistance regulations will result in recovery or restitution of payment by the Department and may adversely effect participation in the Program.

COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO:

Division of Provider Assessment- Telephone (717) 772-4604

Visit the Office of Medical Assistance Programs website at www.dpw.state.pa.us/omap.