WHAT TO LOOK FOR ON THE NEW TAMPER-RESISTANT PRESCRIPTION FORMS

Beginning January 1, 2005, written prescriptions for controlled substances must be on tamper-resistant security prescription forms that have been preprinted by a Board-approved printer and must contain specific elements (Health & Safety Code Section 11162.1 et seq.). There is no single specific format, size or color for the security prescription forms, so pharmacists need to be aware of the required elements for such forms. Security features are used to prevent fraud or diversion.

DESCRIPTION OF SECURITY FEATURES

The law requires a description of the security features be printed on each security form. Some forms describe each feature in a list on the back of the prescription; however, some forms describe features in “warning bands” across the face or along the edge of the prescription. The description should tell what and where the features are on the form and how to test them. (click here to view samples)

Other security feature components are:

1. **Latent Repetitive Void Pattern** — the word “void” must appear in a pattern across the entire face of the security prescription form if it is scanned, photocopied, or faxed. Consequently, if a prescription is to be faxed, prescribers are encouraged to use plain paper prescription forms (not security prescription forms) for this purpose. A pharmacist receiving a “void” faxed prescription should always use his or her professional judgment when filling the prescription and contact the prescriber anytime there are questions concerning a prescription’s validity (just as a pharmacist would do with any prescription).

2. **Watermark** — a printed watermark consisting of the words, “California Security Prescription,” must be printed on the backside of the prescription blank. The watermark is often very light but can be seen by holding the form at an angle.

3. **Chemical Void** — a protection that prevents alteration by chemical washing. Any area of the security form that is exposed to ink solvents (e.g., acetone) will cause a “void” pattern to appear or will appear heavily stained. This feature is important to prevent unauthorized changes to a security form after the prescriber has written the prescription.

4. **Thermochromic Ink Feature** — a feature (e.g., a symbol or text) printed in thermochromic ink. Such a feature will change color or disappear temporarily when exposed to heat, such as rubbing briskly with your fingers or with hot breath. An important aspect of this ink is that the feature returns to its original color when it cools.

5. **Opaque Writing** — an area of opaque writing so that the writing disappears if the prescription is lightened.
6. **Quantity Check-off Boxes**—Six quantity check-off boxes must be printed on the form with specific quantity range choices as illustrated on the right (see Computer Generated Prescriptions Using Institution Forms below for a limited exception to this rule.). This feature is important to prevent alteration of the quantity ordered after the prescription is written. The prescriber checks the box next to the quantity range that matches the number of tablets or capsules prescribed for each prescription written. On forms with only one set of check boxes but includes multiple prescriptions on one form, the appropriate quantity range for each prescription written should be checked. If the quantity of two or more prescriptions falls into the same quantity range, the range is checked only once.

7. **Unit Designation**—In conjunction with the quantity check-off boxes referenced above, there must be a space for designating the drug form or unit if the prescribed drug is not in tablet or capsule form (e.g., “ml” for milliliter, “sol” for solution, etc).

8. **Single or Multiple Drug Statements**—The new security prescription forms come in two prescription formats: a single drug format and a multiple drug format. The single drug format has the following statement printed on the form:
   - “Prescription is void if more than one controlled substance prescription is written per blank. (click here to view sample)

   The multiple drug format has the following printed on the form:
   - “Prescription is void if the number of drugs prescribed is not noted” and a line provided for the prescriber to write in or circle the number of drugs prescribed.
   
   Note: Although the board would prefer multiple drug forms to be sectioned for each drug prescribed and include quantity check-off boxes, refill, and do not substitute instructions for each section, it is not required. (click here to view sample)

9. **“Do Not Substitute” Check Box**—The statement “Do Not Substitute” must appear on the form, and if checked off, indicates the prescriber’s order not to substitute the drug prescribed. The prescriber must also personally initial the check box to confirm.

10. **Form Batch Numbers**—Every batch of security forms must have a unique lot number printed on the forms and each form within that batch is numbered sequentially, beginning with numeral one.

**PREPRINTED PRESCRIBER REQUIREMENTS AND LIMITED EXCEPTIONS FOR LICENSED HEALTH CARE FACILITIES**

**Preprinted Prescriber Information**—Controlled substance security prescription forms must be preprinted with the name, category of licensure (e.g., MD, DDS, etc), license number, and federal controlled substance registration number of the prescriber, by a board-approved security printer. In addition, the prescriber’s address and phone number is required to be on the form to be a valid prescription; however, this information can be preprinted (preferred), handwritten, or stamped on the form. Multiple prescribers, even multiple addresses, with check boxes are allowed. (click here to view sample)
Preprinted Forms for Licensed Health Care Facilities - The “institution” style form is an option available to licensed health care facilities only. A "licensed health care facility" means a facility licensed pursuant to Article 1 (commencing with section 1250) of Chapter 2 of Division 2 of the California Health and Safety Code, such as, a general 24-hour acute care hospital, acute psychiatric hospital, skilled nursing facility, or intermediate care facility. Qualified licensed health care facilities that wish to use the “institution” style forms, must designate a prescriber to order forms, receive delivery, distribute the forms to authorized prescribers within the facility, and record the names, federal controlled substance registration numbers, license numbers, and quantity of forms issued to each. The facility must maintain the records for three years. (click here to view sample)

- **Forms for Institutional Use**— The institutional style forms must be ordered from an approved printer and include all of the same security features. The “designated prescriber’s” name, category of licensure, license number, and federal controlled substance registration number must be preprinted on the institution style form, as well as, the facility’s name, address, category of licensure, and Department of Health Services issued license number. A blank area is provided for the actual prescriber within the facility to write or stamp his or her name, category of licensure, license number, and federal controlled substance registration number when the prescription is written. It is important to note that a prescription written on an institutional style form is not valid without the actual prescriber information filled in on the form.

  a) **Computer Generated Prescriptions Using Institution Forms** – A special provision for licensed health care facilities that computer generate prescriptions to print on “institution” style laser or dot matrix forms have the following exceptions:

- Computer generated institution style forms do not require the quantity check-off boxes;
- The facility’s “designated prescriber” is not required to maintain a record of the prescriber’s to whom the institution style computer generated prescription forms are distributed to within the facility; and
- The computer software can print the actual prescriber’s name, category of licensure, DEA number, and license number on the form, as well as, the date the prescription is written. The actual prescriber must sign the prescription.

  **Note:** These exceptions do not apply to laser or dot matrix controlled substance prescription forms for use by an individual prescriber, group practice, clinic, surgery center, or any other outpatient setting.

If you have questions concerning the validity of a prescription, treat the prescription like any other questionable prescription—call the prescriber to verify. If the form does not contain the proper features, it may indicate that it was not printed by a Board–approved printer. Such prescriptions should be reported to the Department of Justice, Bureau of Narcotic Enforcement at (916) 319-9062.