

Denti-Cal Bulletin



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Tamper-Resistant Prescription Pads

Effective April 1, 2008, in order for Denti-Cal outpatient drugs to be reimbursable by the federal government, all written, non-electronic prescriptions must be executed on tamper-resistant pads. The tamper-resistant prescription pad requirement applies to all outpatient drugs, including over-the-counter drugs. This new law impacts all dentists and other providers who prescribe outpatient drugs.

The Centers for Medicare and Medicaid Services (CMS) has issued guidance on this requirement that can be found on the Web site: www.cms.hhs.gov/center/intergovernmental.asp.

As outlined by CMS, to be considered tamper-resistant on April 1, 2008, a prescription pad must contain at least one of the following three characteristics and by October 1, 2008 all three characteristics:

1. One or more industry-recognized features designed to prevent unauthorized copying of a completed or blank prescription form;
2. One or more industry-recognized features designed to prevent the erasure or modification of information written on the prescription by the prescriber; or,
3. One or more industry-recognized features designed to prevent the use of counterfeit prescription forms.

On January 16, 2008, the National Council for Prescription Drug Programs (NCPDP) held an industry forum in an effort to bring conformity to State-issued guidelines regarding Federal legislation on Tamper-Resistant Prescription Pads. On February 1, 2008, NCPDP issued a letter to state Medicaid directors with the result of the forum. This letter provides additional information as to which tamper-resistant features fall within the three characteristics. A copy of this letter can be found on the Medi-Cal Web site www.medi-cal.ca.gov.

The California-required tamper-resistant prescription pads for controlled drugs fully meet the October 1, 2008 federal compliance requirements under the new Medi-Cal requirement. Prescribers are encouraged to use the current pads in order to fulfill the new federal law, and may order tamper-resistant prescription pads from security prescription printer companies.

Those companies preapproved by the California Department of Justice and Board of Pharmacy to produce tamper-resistant prescription pads are listed at the following Web site: www.ag.ca.gov/bne/security_printer_list.php. This directory provides an alphabetical listing of companies and is updated as new security prescription printers are approved. Providers will need their prescriber's state license number and a copy of their DEA Registration when they place their order. Other security prescription printer companies are available and may be used as needed. To comply with California statute, regardless of how a provider chooses to procure tamper-resistant prescription pads for all other written Medi-Cal prescriptions, providers must continue to procure tamper-resistant prescription pads for controlled drugs from the list of approved security prescription printer companies.

For questions on the above please contact the Denti-Cal Telephone Service Center at (800) 423-0507.