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ACS M07-13E
(Continuation of ACS M07-13, ACS M07-13A,
ACS M07-13B, ACS M07-13C, and ACS M07-13D)

MEMORANDUM

TO: Medicaid Physicians, Dentists, Physician Assistants, Advanced Practice
Registered Nurses, Optometrist, Medicaid Participating Hospital Emergency
Rooms, Other Providers with Authority and Pharmacy Providers

FROM: Kenneth S. Fink, MD, MGA, MPH 
Med-QUEST Division Administrator

SUBJECT: FEE-FOR-SERVICE (FFS) PROGRAM ONLY

**TAMPER RESISTANT PRESCRIPTION PAD (TRPP) CLARIFICATION
OF RECOMMENDED FEATURES FOR HAWAII MEDICAID
EFFECTIVE OCTOBER 1, 2008**

Effective October 1, 2008, all FFS Medicaid prescriptions that are either handwritten or printed from an Electronic Medical Record (EMR) or from an ePrescribing application must contain at least one (1) feature from each of the three (3) categories of tamper resistance. (See Table 1. Best Practices for Tamper Resistant Printed Prescriptions)

Centers for Medicare and Medicaid Services' (CMS) prior guidance for prescriptions printed from EMRs or ePrescribing applications stated that special copy resistant paper would likely be required to be in compliance as of October 1, 2008. CMS has clarified this issue and it is not necessary if special software for improved printing capabilities is used to allow microprinting and/or VOID/Illegal/Copy pantographs. EMR or ePrescribing generated prescriptions may be printed on plain paper, and be fully compliant provided they contain at least one (1) feature from each of the three (3) categories of tamper resistance detailed below. Note: See Table 1 for updated guidance from the National Council for Prescription Drug Programs (NCPDP) industry forum held June 26, 2008, and CMS.

Prescriptions for Medicaid FFS recipients and for QUEST recipients written by a dentist that are telephoned, faxed, or ePrescribed remain exempt from these tamper resistance requirements.

Note: Prescriptions for QUEST recipients except those written by dentists do NOT require TRPP.

Review of CMS Requirements for FFS Medicaid

Currently, a handwritten or computer generated prescription must contain one (1) feature in at least one (1) of the following three (3) characteristic categories to be compliant. **Starting October 1, 2008**, handwritten or printed prescriptions must contain at least one (1) feature from **each of the three (3) categories listed below for a total of three (3). No one feature may be counted twice.**

While the law specifies the term "prescription pad", CMS stated that these requirements also apply to computer-generated prescriptions that are printed using paper inserted into the printer.

- 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.
- 3) One or more industry-recognized features designed to prevent the use of counterfeit prescription forms.

The Best Practices for TRPP recommended by the NCPDP industry forum and supported by the Med-QUEST Division, are described in Table 1 below. New information is underlined. See Appendix 1 for examples of Handwritten and EMR generated prescriptions.

Note: If the original prescription was presented to the pharmacy for filling prior to October 1, 2008, the refills of that prescription do not need to be on TRPP with all three (3) characteristics. It needs to contain only one (1) of the three required characteristics.

Note: The listing of the security features and descriptions on all prescriptions is **STRONGLY** recommended so the pharmacist can easily identify them and determine compliance.

There is no single format, size or color for the security prescription forms. Additional expensive safety features such as unique batch numbers and holograms may be used.

For more information about the tamper resistant requirements, visit www.himed-questffs.org or for the Top Questions About Tamper Resistant Prescriptions, www.cms.hhs.gov/DeficitReductionAct/Downloads/MIPTRPFAQs9122007.pdf and for Medicaid Prescription Resistant Prescription Pad Law - Pharmacist Fact Sheet, www.cms.hhs.gov/DeficitReductionAct/Downloads/tamperapril1.pdf.

Thank you for your continued efforts to comply with these new requirements. If you have questions regarding this memorandum or Medicaid drug claims processing, please contact Affiliated Computer Services Pharmacy Benefit Manager (ACS PBM) Call Center at 1 (877) 439-0803.

Attachments

Table 1. Best Practices for Tamper Resistant Printed Prescriptions

Required Tamper-Resistant Categories	Feature	Description
<p>Category 1: Copy Resistance</p>	<p>A) Void/Illegal/Copy pantograph with or without Reverse Rx.</p> <p>B) <u>Micro print signature line for prescriptions generated by an EMR if they cannot produce Void/Illegal/Copy Pantograph with or without Reverse Rx.</u></p>	<p><i>The word "Void," "Illegal," or "Copy" appears when the prescription is photocopied.</i></p> <p><u><i>Micro print: Very small font which is legible (readable) when viewed at 5x magnification or greater, and illegible when copied. To be effective, must be printed in 0.5 font or less making it illegible to the pharmacist when copied.</i></u></p>
<p>Category 2: Erasure/Modification Resistance</p> <ul style="list-style-type: none"> • <u>Any one of A) or B)</u> • <u>Or any combination of A) and B)</u> 	<p>A)</p> <ol style="list-style-type: none"> 1. An erasure revealing background (resists erasures and alterations) for written prescriptions; or 2. <u>Printed on "toner-lock" paper for laser printed prescriptions, and on plain bond paper for inkjet printed prescriptions.</u> 	<p><i>Background that consists of a solid color or consistent pattern that has been printed onto the paper. This will inhibit a forger from physically erasing written or printed information on a prescription form.</i></p> <p><u><i>Toner-lock paper is special printer paper that establishes a strong bond between laser-printed text and paper, making erasure obvious. Note – this is NOT necessary for inkjet printers – as the ink from inkjet printers is absorbed into normal "bond" paper.</i></u></p>
	<p>B)</p> <ol style="list-style-type: none"> 1. Quantity check off boxes; 2. Refill indicator; or 3. <u>Border characteristics (dispense and refill # bordered by asterisks and optionally spelled out). Recommended for prescriptions generated by computer.</u> 	<p><i>In addition to the written quantity on the prescription, quantities are indicated in ranges. The corresponding range box MUST be checked for the prescription to be valid.</i></p> <p><i>Circle number of refills; or "NR".</i></p> <p><u><i>Quantities and refill # are surrounded by special characters such as an asterisks to prevent modification, e.g., QTY **50**.</i></u></p>
<p>Category 3: Counterfeit Resistance</p>	<p>A) Security features and descriptions listed on the prescription.</p>	<p><i>A complete list of the security features printed on the prescription paper aids pharmacists in identification of features and determining compliance.</i></p>

Appendix 1

Best Practices For Tamper Resistant Prescription (Handwritten)

Front

Back

Void or Copy Pantograph: displays "VOID" or "ILLEGAL" on a color copy of an Rx. It will appear on a wide range of copier settings. (Cat. 1)

Chemically-Protected Paper: Invisible coating causes "VOID" or a stain to appear on a handwritten Rx when altered by a wide range of chemicals. Toner receptor coating protects laser-printed Rx data from being removed or altered. (Cat. 2) Recommended for use with Preprinted Text Fields

SPRINGHAVEN MEDICAL PRACTICE
1234 HEALTH CENTER DRIVE
DAYTON, OH 45408
PHONE 1-937-221-1234 • FAX 1-937-434-5678

JOHN R. SMITH, M.D.
Lic: 123456 • DEA: XX1234567
NPI: 2222222222

HELEN C. DOE, M.D.
Lic: 123456 • DEA: XX1234567
NPI: 2222222222

PATIENT'S FULL NAME	SEX	DATE OF BIRTH
ADDRESS		DATE

00000001

Rx

Preprinted Text Fields: Quantity check boxes, refill indicators, and preprinted limitations or guidelines make the Rx harder to modify. (Cat.2)

1-24
 25-49
 50-74
 75-100
 101-150
 151 and over

PRESCRIBER'S SIGNATURE

TEST AREA Refills 1 2 3 4 _____ DEA # _____
 No Refills Void After _____ **VALID FOR CONTROLLED SUBSTANCES**



Security Features List: a prominent display of the prescriptions features, sometimes part of a "Warning Band" or box. (CMS 2)

Heat-sensitive Image: on Rx, logo or other symbol printed with thermochromic ink, so the image changes color or disappears when it is rubbed briskly or exposed to warm breath. (CMS 1 and 3)

Phantom Void or Copy Pantograph: displays "VOID" or "ILLEGAL" on a color copy of an Rx. It will appear on a wide range of copier settings. (CMS 1)

Chemically-Protected Paper: Coating causes "VOID" or a stain to appear on a handwritten Rx when altered by a wide range of chemicals. Toner receptor coating protects laser-printed Rx data from being removed or altered. (CMS 2)

Preprinted Text Fields: quantity check boxes, refill indicators, and preprinted limitations or guidelines make the Rx harder to modify. (CMS 2)

Heat-sensitive Image: An Rx, logo, or other symbol printed with Thermochromic ink, so the image changes color or disappears when it is rubbed briskly or exposed to warm breath. (Cat. 1 and 3)

Security Features List: a prominent display of the prescriptions features, sometimes part of a "Warning Band" or box. (Cat. 3)

Example of a Color Copied Prescription

SPRINGHAVEN MEDICAL PRACTICE
1234 HEALTH CENTER DRIVE
DAYTON, OH 45408
PHONE 1-937-221-1234 • FAX 1-937-434-5678

JOHN R. SMITH, M.D.
Lic: 123456 • DEA: XX1234567
NPI: 2222222222

HELEN C. DOE, M.D.
Lic: 123456 • DEA: XX1234567
NPI: 2222222222

PATIENT'S FULL NAME	SEX	DATE OF BIRTH
ADDRESS		DATE

00000001

Rx

Preprinted Text Fields: Quantity check boxes, refill indicators, and preprinted limitations or guidelines make the Rx harder to modify. (Cat.2)

1-24
 25-49
 50-74
 75-100
 101-150
 151 and over

PRESCRIBER'S SIGNATURE

TEST AREA Refills 1 2 3 4 _____ DEA # _____
 No Refills Void After _____ **VALID FOR CONTROLLED SUBSTANCES**

Hollow Pantograph: VOID or ILLEGAL is designed to not obscure or block vital information. Often showing strongest intensity at the "top" or the document. These pantographs generally do not "pop" on a black and white fax

Appendix 1 (continued)

Best Practices for Tamper Resistant Printed Prescriptions (Generated by an EMR)

Example A

Washington Medical Group
555 Pennsylvania Ave, Washington DC 20001
202-222-2222 (Fax) 202-222-1111

Name	Jane Q Public	Date	06/29/2008
Addr	123 Main Street	DOB	07/04/1960
City	Washington, DC 20001	Ph:	202-555-5555

HYDROCHLOROTHIAZIDE 12.5 MG CAPS One (1) tab by mouth each morning
Generic: HYDROCHLOROTHIAZIDE
Disp ***30*** THIRTY (2)
Refill ***3*** THREE

Security features: (1) bordered & spelled quantities, microprint signature line visible at 5x or > magnification that
in list below THIS IS AN ORIGINAL PRESCRIPTION & this description of features (3)

(1) John Smith, MD
NPI# 1111111111

- Category #1 – Copy Resistance: Microprint signature line*.
- Category #2 – Modification / Erasure Resistance: Border characteristics (dispense and refill # bordered by asterisks AND spelled out).
- Category #2 – Modification / Erasure Resistance: Printed on “toner-lock” paper.
- Category #3 – Counterfeit Resistance: Listing of security features.

*Microprint Line viewed at 5x magnification.

THIS IS AN ORIGINAL PRESCRIPTION-THIS IS AN ORIGINAL PRESCRIPTION-THIS IS AN ORIGINAL PRESCRIPTION-THIS IS AN ORIGINAL PRESCRIPTION

Appendix I (continued)

Best Practices for Tamper Resistant Printed Prescriptions (Generated by an EMR)

Example B

Washington Medical Group
555 Pennsylvania Ave, Washington DC 20001
202-222-2222 (Fax) 202-222-1111 (1)

Name Jane Q Public Date 06/29/2008
Addr 123 Main Street DOB 07/04/1960
City Washington, DC 20001 Ph: 202-555-5555

HYDROCHLOROTHIAZIDE 12.5 MG CAPS One (1) tab by mouth each morning
Generic: HYDROCHLOROTHIAZIDE
Disp ***30*** THIRTY (2)
Refill ***3*** THREE

Security features include: (*) bordered and spelled quantities, a void pantograph and reverse Rx (when copied - the prescription will say "COPY" and the "Rx" in the upper right corner will NOT be visible), and this description of features.
(3)

John Smith, MD
NPI# 1111111111

- Category #1 – Void/Illegal/Copy Pantograph with or without Reverse Rx.
- Category #2 – Modification / Erasure Resistance: Border characteristics (dispense and refill # bordered by asterisks AND spelled out).
- Category #2 – Modification / Erasure Resistance: Printed on “toner-lock” paper for laser printed prescriptions, and on plain bond paper for inkjet printed prescriptions.
- Category #3 – Counterfeit Resistance: Listing of security features.