

Jean Phillips, Deputy Administrator  
Division of Medical Assistance Programs

Carolyn Ross, Field Services Manager  
Seniors and People with Disabilities

**Authorized Signature**

**Number:** DMAP-IM-08-106

**Issue Date:** 08/25/2008

**Topic:** Medical Benefits

**Subject:** Provider Announcement - Requirements for Tamper Resistant Prescriptions  
Pad Deadline October 1, 2008

**Applies to (check all that apply):**

- |  |   |
|--|---|
| <input type="checkbox"/> All DHS employees             | <input type="checkbox"/> County Mental Health Directors   |
| <input type="checkbox"/> Area Agencies on Aging        | <input type="checkbox"/> Health Services  |
| <input type="checkbox"/> Children, Adults and Families | <input type="checkbox"/> Seniors and People with Disabilities   |
| <input type="checkbox"/> County DD Program Managers    | <input checked="" type="checkbox"/> Other (please specify): DHS staff and others identified on the SPD, CAF, AMH and DMAP transmittal lists |

**Message:**

A letter will be mailed to all prescribing facilities and providers. The announcement will post the week of August 18 to the Web. This announcement is one of a series about CMS's requirement starting October 1 that all pads used for Medicaid clients contain at least one industry-recognized tamper resistant feature from all three categories.

*If you have any questions about this information, contact:*

<b>Contact(s):</b>	Ralph Magrish, Pharmacy Program Manager		
<b>Phone:</b>	503-945-6291	<b>Fax:</b>	503-373-7689
<b>E-mail:</b>	Ralph.M.Magrish@state.or.us		

# Required changes for prescribers

## For tamper-resistant prescriptions on October 1, 2008

DMAP will require all hand-written and computer-printed Medicaid prescriptions, including those for over-the-counter (OTC) products, be tamper-resistant.

This requirement applies to all outpatient prescriptions that DMAP reimburses on a fee-for-service basis.

### Required features of tamper-resistant pads

Beginning October 1, the Centers for Medicare & Medicaid Services (CMS) will require that all pads used for Medicaid prescriptions contain at least one industry-recognized feature from each of the following categories.

Unauthorized copying	Erasure or modification		Counterfeiting
<ul style="list-style-type: none"> <li>■ Watermarks that include either security back print, digital or other special features</li> <li>■ Pantograph Screen that displays background graphic or the words “VOID, ILLEGAL, or COPY” when copied</li> <li>■ Thermochromatic or Coin-Reactive Ink that changes color with temperature change or being rubbed with a coin</li> <li>■ Micro printing which either creates the signature line or border characteristics (dispense and refill # bordered by asterisks AND spelled out) Must be printed in 0.5 font or less to make it illegible when copied</li> </ul>	<p>Features that show <b>erasure</b> has been attempted:</p> <ul style="list-style-type: none"> <li>■ Graduated background</li> <li>■ Erasure revealing background (Color or bleeding background)</li> <li>■ Chemically reactive paper for hand written prescriptions</li> <li>■ Toner receptor coating or toner lock for computer generated prescriptions printed with a laser printer</li> </ul>	<p>Features that show <b>modification</b> has been attempted:</p> <ul style="list-style-type: none"> <li>■ Diagonal lines on the back of the paper which discourage cutting and pasting of the prescription</li> <li>■ Quantity check off boxes and refill indicator (circle or check number of refills or NR)</li> <li>■ Quantity and Refill Border and Fill surrounded by special characters such as asterisks, e.g. QTY**50**</li> </ul>	<ul style="list-style-type: none"> <li>■ Warning band which identifies and lists the tamper-resistant features of the prescription</li> <li>■ Unique serial numbers or bar codes that encode the batch number of pads</li> <li>■ Thermochromatic ink that changes color with temperature change</li> <li>■ Security thread made of plastic or metal embedded in the paper as used in currency</li> <li>■ Holograms that interfere with photocopying or scanning</li> </ul>

**Important: Holographic stickers alone will not suffice to meet these requirements! Gel pens are not an approved method for tamper resistance.**

## Exceptions

- Written prescriptions paid for by a **managed care entity** (*i.e.*, DMAP medical plan or physician care organization)
- Written, faxed, and telephoned orders sent from the prescriber directly to long-term care facilities, community-based facilities, or other **institutional settings**, that the facility's medical staff then enter into the patient's medical record and deliver to the pharmacy, so long as the patient or patient's family never has the opportunity to handle the written order
- Except when DEA regulations require a written prescription (*i.e.*, for **Schedule II** controlled substances) DMAP encourages prescribers to submit prescriptions electronically, by phone, or by fax whenever possible. For more information, go to the State Board of Pharmacy Web site for information about DEA requirements. [www.oregon.gov/Pharmacy/DEA\\_Info.shtml](http://www.oregon.gov/Pharmacy/DEA_Info.shtml)
- In an **emergency** situation, prescriptions written on non-tamper resistant pads will be permitted as long as the prescriber provides a verbal, faxed, electronic, or compliant written prescription within 72 hours of the date on which the prescription was filled.

## Prescription pad vendor lists

These lists are provided for information purposes only. DHS does not recommend nor endorse any specific vendors in these lists.

- List from the American Public Human Services Association (2/08)  
[www.nasmd.org/issues/docs/APHSA-VendorsforTRPads.pdf](http://www.nasmd.org/issues/docs/APHSA-VendorsforTRPads.pdf)
- List from the National Association of Chain Drug Stores (9/07)  
[www.nasmd.org/issues/docs/TRPPVendors.pdf](http://www.nasmd.org/issues/docs/TRPPVendors.pdf)

## Operational guidance

- CMS guidance on TRPP requirements, written for pharmacists (7/17/08)  
[www.cms.hhs.gov/DeficitReductionAct/Downloads/MIPTRPFAQs9122007.pdf](http://www.cms.hhs.gov/DeficitReductionAct/Downloads/MIPTRPFAQs9122007.pdf)
- The Oregon Board of Pharmacy's TRPP FAQ page  
[www.oregon.gov/Pharmacy/TamperProofRx.shtml](http://www.oregon.gov/Pharmacy/TamperProofRx.shtml)
- Frequently asked questions for pharmacists – Compiled by the American Pharmacists Association, NACDS and National Community Pharmacists Association  
[www.nacds.org/user-assets/pdfs/gov\\_affairs/Issues/Tamper\\_Resist/NCPDP\\_Tamper\\_Pharmacists\\_QA.pdf](http://www.nacds.org/user-assets/pdfs/gov_affairs/Issues/Tamper_Resist/NCPDP_Tamper_Pharmacists_QA.pdf)
- Please visit DMAP's TRPP page for additional information.  
[www.dhs.state.or.us/policy/healthplan/guides/pharmacy/trpp.html](http://www.dhs.state.or.us/policy/healthplan/guides/pharmacy/trpp.html)

