

CALIFORNIA controlled substance prescription pads FAQ's

Q: Where can I find the regulations for the controlled substance prescription pads for the state of California?

A: <http://law.onecle.com/california/health/11162.1.html>

Q: Can you ship to a PO Box?

A: *Wilmer uses UPS to ship their orders and UPS does not deliver to PO Boxes. The state of California will not allow shipments to a PO Box, as they feel this is not a safe place to leave controlled substance prescriptions pads unattended. All shipments must be signed for, as we need to pull this information and keep it in our files. UPS provides this with their on-line tracking site.*

Q: Where can I ship the order of prescription pads?

A: *As a California Security Printer, we must follow the guidelines set forth by the state. Our orders must ship to the physicians address on file for their state license or DEA license number.*

Q: What if the physician I am ordering for doesn't want their order shipped to that address, or it is a PO Box?

A: *The Physician must update their address with the state or DEA. They can do this online. We can then take their confirmation print out and print one order. Any future orders must be looked up in the DEA database and verified that the new address is in there before we process the order. To update their state license, they can go online to http://www.medbd.ca.gov/licensee/address_record.html and log in to update their information. To update their DEA number, they can go online to http://content.chghealthcare.com/ch_lt/ext_residents/dea_registration.pdf.*

Q: I have a new physician with an out-of-state license number. What do I do?

A: *The physician has 30 days to report their move to California with the state board and update their information. See the response above for more information regarding placing orders.*

Q: I have a physician who does not have a DEA number. Can I order the controlled substance prescription pads without it?

A: *If the physician does not have a DEA number they cannot write prescriptions for controlled substances, therefore they would not need the controlled substance prescription pads. You may order one of our standard prescription pads or our standard bond paper.*

Q: Can I order prescription pads if the physicians license or DEA number has expired?

A: We cannot print controlled substance prescriptions if either of their license numbers has expired. If it's expired, they no longer have the permissions to write prescriptions.

Q: What options does my customer have when ordering CA controlled substance scripts?

A: There are three scenarios for imprinting prescription forms:

- 1. One physician is using the prescription pad/book/laser sheet and their name, category of licensure, state license number and DEA number is imprinted on the script.*
- 2. Two or more physicians are using the prescription pad/book/laser sheets and each of them have their name, category of licensure, state license number and DEA number imprinted on the scripts along with a check box by their name. This must be checked at the time the prescription is written to specify which physician is prescribing.*
- 3. The institutional style(facility must qualify as one) allows for many to use the same sheets, but a designated prescriber must have their name, category of licensure, state license number and DEA number imprinted on the script, along with the facilities name, address, and Department of Health Services license number. The designated prescriber must maintain a record of distribution of the scripts that includes the name, category of licensure, state license number, DEA number and the quantity of "institution" scripts issued to each physician within the facility. These records must be maintained for three years in an easily retrievable format, in case of audit. The prescribing physician must print, stamp or handwrite their name, state license number, category of licensure and DEA number on the script at the time of prescribing.*

Q: Does my customer qualify as a "licensed health care facility" so that they may use the institutional style forms discussed above?

A: A "licensed health care facility" means a facility that has been licensed pursuant to Article 1 (commencing with section 1250) of Chapter 2 of Division 2 of the California Health and Safety Code.

<http://law.justia.com/california/codes/2009/hsc/1250-1264.html>

Q: We work out of a hospital and can print prescriptions with our software. Can't we add the imprinting and numbering ourselves to the laser Rx sheets?

A: For controlled substance prescriptions, the security printer must apply all security features and meet all guidelines set forth by the state of California, which includes imprinting the physician(s), designated physician, or facilities name, address and DEA number and numbering on the pad before it leaves the facility.

Q: Can the pre-printed prescriber information be added at the hospital with our software?

A: *See response above for more information. The designated prescriber must be on the prescription script before it leaves the facility. At the time you print the prescription on the laser Rx sheet, you would need to add the prescribing physician's name, license number and DEA number. If all the physicians using the paper are listed with checkboxes on the sheet upon leaving our facility, you must then check the box next to the prescribing physician.*

Q: Do the laser Rx sheets need to show the six quantity check boxes on the script?

A: *No. They are exempt from this security feature, as it is very difficult to have the software match up to the boxes. However, they must meet all other guidelines, including designating the number of units and refills, a check box indicating the prescriber's orders not to substitute and the area to fill in the number of prescriptions on the script.*

Q: Is there a limit to the number of prescriptions that can be on the script?

A: *Not in any formal law, however the Department of Justice would like it limited to five prescriptions on a script, or the information gets too convoluted.*

Q: If my customer has several offices, can they have all the addresses printed on the scripts?

A: *Yes. Multiple addresses for a prescriber may be listed on the script. There should be a check box next to each location to identify the address where the patient was seen.*

Q: Can we use Wilmer's standard laser Rx sheets to print our controlled substance prescriptions on?

A: *The stock items PRESLBL's or PRESLGN's can be used for non-controlled California prescriptions, however, controlled substance prescriptions must have certain security features that our standard line does not have. (i.e. a watermark on the back of the prescription which says "California Security Prescription") We now offer two California laser Rx sheets that meet the Health and Safety Code 11162.1 regulations. (PRESCALBLI top script, or PRESCABLBLI bottom script) We currently do not offer an 8-1/2" x 11" sheet, but are looking into adding it some time in early 2011.*

Q: Can we use your standard thermal prescription rolls to print our controlled substance prescriptions on?

A: *Please see above response.*

Q: Does a resident physician need their supervising physician's name pre-printed on the script?

A: No. They have graduated from medical school and are able to write prescriptions. Since most, at this time, are in their residency to learn a specialty, a physician must supervisor their daily activities.

Q: Does a resident physician need to have their information pre-printed on the prescription script?

A: If they are writing controlled substances, yes. They must follow the rules as all other physicians. (i.e. the supervising physician cannot order a large amount of prescription pads with their information on there for the resident(s) to write their name on it at the time of prescribing. The residents information must be pre-printed on the script)

Q: Does a nurse practitioner or certified midwife need to have their information pre-printed on the prescription script?

A: Yes. It cannot be stamped or hand-written.

Q: Does a nurse practitioner or certified midwife need their supervising physicians name pre-printed on the script?

A: No.

Q: Does a physician assistant need to have their information pre-printed on the prescription script?

A: Yes. It cannot be stamped or hand-written.

Q: Does a physician assistant need their supervising physicians name pre-printed on the script?

A: Yes. The law requires that a physician's assistant is authorized to write controlled substance prescriptions based on the authority granted to them by their supervising physician and DEA registration. The script must have the physician assistants name, category of licensure, DEA number and state license number pre-printed. It must also have their supervising physician's name, category of licensure, DEA number and state license number pre-printed on the script.

<http://law.onecle.com/california/business/3502.1.html>

Q: Does a dentist need to have a DEA number?

A: If they are writing controlled substances, yes.

Q: Does an optometrist need a DEA number?

A: If they are writing schedule III controlled substances, yes.

Q: Does a veterinarian need to follow the guidelines for controlled substances?

A: Yes, they must follow the same guidelines for controlled substance prescriptions as a physician who sees humans would. The prescription must also have a spot for the owners name, animals name and the animals date of birth.

Q: What are considered controlled substances?

A: Any substances that fall into schedule II, III, IV and V are considered controlled substances and must follow these guidelines. Schedule I drugs are not used for medicinal purposes.

Q: Where can I find a list of the controlled substances and the drug schedule?

A: The federal government lists controlled substances on their website.

http://www.dea diversion.usdoj.gov/schedules/orangebook/c_cs_alpha.pdf

Q: Are there any exceptions to this?

A: Yes. Schedule III, IV and V can be orally prescribed or faxed to the pharmacy. Schedule II can only be faxed in an emergency case, however the prescription must be hand-written and postmarked within seven days, or if the hand-written prescription is presented at the pharmacy before dispensing.

Q: Can a prescriber write a prescription for non-controlled substances on a controlled substances script?

A: Yes.

Q: Can a prescriber write a prescription for non-controlled substances and controlled substances on the same script?

A: Yes.

Q: Is a federal controlled substance registration number the same thing as a DEA registration number?

A: Yes.

For more information about guidelines for security printers see the following link:

<http://www.ag.ca.gov/bne/prescriptions.php>