**Procedure Statement**

The Rutgers RWJMG adheres to the requirements of the New Jersey Uniform Prescription Blank Program and all related statues and regulations.

**Reason for Procedure**

Prescription fraud is a significant problem in the United States ($5B annual estimate). Medicare/Medicaid legislation mandates for the use of tamper-resistant prescription blanks, state-based uniform prescription blanks programs, and the increasing use of e-prescribing are designed to enhance security and reduce the likelihood of prescription forgeries. The RWJMG adheres to the requirements of the New Jersey Uniform Prescription Blank Program and all related UMDNJ policies. The Robert Wood Johnson Medical Group (RWJMG) prescription blank security procedure is based on best practices that have been identified in the literature and public domain. E-prescribing offers the greatest security and as such, is the preferred method of prescribing and refilling medications.

This procedure provides direction to the RWJMS faculty and staff on how to maintain security of blank prescription pads and computer prescription paper, and the proper steps to take if prescription blanks have been stolen, forged, or lost.

**Who Should Read This Procedure**

This procedure is applicable to all RWJMS faculty and staff, including but not limited to staff and members of the RWJMG that are involved in the ordering, storage, maintenance, distribution, use, and destruction of prescription blanks (prescription pads and computer prescription paper).

**Related Documents**

**Contacts**

Medical Director of Quality and Patient Safety (732-235-6300)
6. The Procedure
   a. Blank Prescription Pads
      I. Process for Requesting, Ordering, and Distributing Blank Prescription Pads to Individual Prescribers or Practice Designee
         i. Individual prescribers or the practice designee submits a request electronically to the Department designee via the RWJMG Faculty and Staff portal.
         ii. The Department designee processes the request and orders blank prescription pads according to the New Jersey Prescription Blank Program directive. The Department designee maintains a Central Prescription Log in the Department for record keeping purposes and to verify distribution of the pads to individual prescribers or practice designees. The Department designee logs the shipment into the Central Prescription Log when it arrives.
            1. The Department designee may maintain a limited inventory of individual prescriber blank pads in a locked cabinet in the Department to be able to fulfill individual prescriber requests in the Department. This is documented in the Central Prescription Log.
            2. The Department designee distributes the blank prescription pad shipment to the practice designee who maintains the Practice Prescription Log. The Department designee and practice designee document and co-sign both the Central Prescription Log and Practice Prescription Log verifying the accuracy of the information (quantity received vs. amount ordered, serial numbers, etc).
      II. Storage and Maintenance of Security in Practice Areas
         i. The inventory of blank prescription pads in the practice area are managed under the supervision of the practice manager/designee and must be secured under lock and key at all times. Prescription pads should not be left in lab coat pockets, on desktops/countertops or, in unlocked drawers.
         ii. As needed, the practice designee distributes a prescription pad to an individual prescriber in the practice area. Both the practice designee and prescriber co-sign the Practice Prescription Log verifying the hand over.
      III. Destruction of Prescription Pads
         i. Blank prescription pads that no longer conform to law or those that contain the names of prescribers who are no longer affiliated with the RWJMG are secured until they are able to be shredded. The practice designee is responsible for securing these prescription blanks, filling out the Prescription Blank Destruction Form, transporting them to the Shredder truck, and verifying/documenting the destruction on the Destruction Form and in the Practice Prescription Log. The completed Destruction Form is maintained in the back of the Practice Prescription Log.
      IV. Reporting lost, stolen, or forged prescription pads
         i. The RWJMG Quality Officer is the point of contact between the RWJMG and outside agencies related to lost, stolen, or forged prescription pads.
         ii. Upon discovery of a stolen or forged prescription, the RWJMG Quality Officer is notified and a copy of the prescription is obtained from the pharmacy (also obtain the pharmacy name and address). If possible, the pharmacy shall provide any proof of identity given to them by the person presenting the prescription.
         iii. The RWJMG Quality Officer/designee notifies the Department of Public Safety to file a report.
         iv. The RWJMG Quality Officer notifies the UMDNJ Internal Investigations Unit within 24 hours of discovery.
v. The RWJMG Quality Officer initiates the New Jersey Prescription Blank Incident Report within 24 hours of discovery and completes/forwards the form to the Office of Drug Control in the Division of Consumer Affairs at the address listed on the form within 72 hours of discovery.

vi. Lost prescription blanks must be reported as described above in Section V.a.IV.ii-iii.

b. Computer Prescription Paper
   I. Process for Requesting, Ordering, and Distributing Blank Computer Prescription Paper to Practice Designee
      i. The practice designee submits a computer prescription paper request electronically to the Department of Internal Medicine designee via the RWJMG Faculty and Staff portal.
      ii. The Department of Internal Medicine designee processes all requests for the RWJMG, including off-site practices and orders computer prescription paper according to the New Jersey Prescription Blank Program directive. The Department designee maintains a Central Prescription Log in the Department for record keeping purposes and to verify distribution of the computer prescription paper to practice designees. The Department designee logs the shipment into the Central Prescription Log when it arrives and distributes it as follows:
         1. The Department of Internal Medicine designee may maintain the Clinical Academic Building’s (CAB) inventory of computer prescription paper in a locked cabinet in the Department and distributes them to the CAB practice areas upon request. Prior to distribution, the inventory is kept under lock and key at all times. Distribution is documented in the Central and Practice Prescription Logs verifying the accuracy of the information at hand over by co-signature.
         2. The Department of Internal Medicine designee distributes the entire inventory for all the other RWJMG practice sites to their practice designees who maintain Practice Prescription Logs. The Department designee and practice designee co-sign both the Central and Practice Prescription Logs verifying the accuracy of the information at hand over (quantity, serial numbers, etc).
   II. Storage and Maintenance of Security in Practice Areas
      i. The inventory of blank computer prescription paper in the practice areas is managed under the supervision of the practice manager/designee and must be secured under lock and key at all times. Blank computer prescription paper may be pre-loaded into printer drawers if those drawers have a locking mechanism. It is not necessary to remove the blank computer prescription paper from the printer at the end of the session to re-secure it if the printer drawer is locked.
      ii. The practice manager/designee signs out inventory as needed to re-supply the printer drawers.
   III. Destruction of Prescription Computer Paper
      i. Blank prescription computer paper that no longer conforms to law is secured until it is able to be shredded. The practice designee is responsible for securing these prescription blanks, filling out the Prescription Blank Destruction Form, transporting them to the Shredder truck, and verifying/documenting the destruction on the Destruction Form and in the Practice Prescription Log. The completed Destruction Form is maintained in the back of the Practice Prescription Log.
   IV. Reporting lost, stolen, or forged computer prescription paper
i. The RWJMG Quality Officer is the point of contact between the RWJMG and outside agencies related to lost, stolen, or forged computer prescription paper.

ii. Upon discovery of a stolen or forged prescription, the RWJMG Quality Officer is notified and a copy of the prescription is obtained from the pharmacy (also obtain the pharmacy name and address). If possible, the pharmacy shall provide any proof of identify given to them by the person presenting the prescription.

iii. The RWJMG Quality Officer/designee notifies the Department of Public Safety to file a report.

iv. The RWJMG Quality Officer notifies the UMDNJ Internal Investigations Unit within 24 hours of discovery.

v. The RWJMG Quality Officer initiates the New Jersey Prescription Blank Incident Report within 24 hours of discovery and complete/forwards the form to the Office of Drug Control in the Division of Consumer Affairs at the address listed on the form within 72 hours of discovery.

vi. Lost blank computer prescription paper must be reported as described above in Section V.b.IV.ii-

V. Review/Monitoring: The RWJMS Office of Ethics Compliance and Corporate Integrity shall periodically review (no less than annually) departmental compliance with this procedure and report its findings.

Definitions

E-prescribing - Technology framework that allows physicians and other licensed prescribers to write and send prescriptions directly to a participating pharmacy electronically instead of using handwritten, faxed or telephoned prescriptions. This method of prescribing offers the greatest security controls.

New Jersey Uniform Prescription Blank Program – State-based program which requires all licensed prescribers of medication in New Jersey to use uniform prescription blanks (NJPBs) that are subject to security controls in order to deter forgery and altered prescriptions. The program requires that NJPBs may be purchased only from approved printer/vendors and that stolen, lost, or forged prescriptions must be reported within 72 hours of discovery.

References


The University Hospital Policy - Lost or Stolen Prescription Pads and-or Electronic Prescriptions Paper Issue No_ 831-200-401