

***Tamper Resistant Prescription Pad/Paper (TRPP) Federal Mandate
Final Phase Effective October 1, 2008***

Effective October 1, 2008, all non-electronic prescriptions must be written on tamper-resistant pads/paper in order to be eligible for reimbursement by Medicaid. Prescriptions must contain at least one feature in ***all three categories*** in order to be considered “tamper-resistant.” The TRPP requirement applies to all outpatient drugs, including over-the-counter drugs. It also applies whether DOM is the primary or secondary payer of the prescription being filled. This new provision impacts all DOM prescribers: physicians, dentists, optometrists, nurse practitioners and other providers who prescribe outpatient drugs.

CMS prior guidance for computer generated/printed prescriptions stated that special copy resistant paper would likely be required for printed prescriptions to be in compliance as of October 1, 2008. CMS has clarified this statement, and is now stating that while special paper may be used to achieve copy resistance – it is not necessary. Computer generated prescriptions may be printed on plain paper, and be fully compliant with all three categories of tamper resistance – provided they contain at least one feature from each of the three categories detailed below. In order for computer generated prescriptions to be compliant with all three categories, prescriber must purchase special software to be used in the printing of the documents OR must use security paper.

The features listed below are recommended as best practice tamper resistant features by a national taskforce including representatives from CMS, State Medicaid agencies, and national medical and pharmacy organizations. Please review this chart because it there have been some minor revisions.

Category 1 – Copy Resistance: <i>One or more industry-recognized features designed to prevent unauthorized copying of a completed or blank prescription form.</i>	
Feature	Description
Void” or “Illegal” Pantograph with or without Reverse “RX”	The word “Void” appears when the prescription is photocopied. Due to the word “Void” on faxed prescriptions, this feature requires the pharmacy to document if the prescription was faxed. Pantograph should be configured so as not to obscure the security feature description contained on the prescription, the beneficiary and the prescriber demographics, or the medication and directions. The Reverse Rx disappears when photocopied at light setting-thus making the pantograph more effective in copy resistance. The pantograph may be used with a reverse RX, but the Reverse RX is not effective as a feature by itself.
Thermochromic ink	Ink changes color with temperature change.
Coin-reactive ink	Ink changes color when rubbed by a coin
Watermarking : Security back print (artificial watermark)	Printed on the back of prescription form. The most popular wording for the security back print is “Security Prescription.”
Digital watermarks	Weak digital watermarks cannot be read if copied and strong digital watermarks provide digital rights management/ ‘proof’ or origin when copied.
Special paper watermarking	Uses special paper containing a watermark that can be seen when backlit.
Diagonal lines (patented “Void”)	Diagonal lines with the work ‘void’ or ‘copy.’
Micro printing-- <i>to be effective, font must be printed in 0.5 font or less making it illegible to the pharmacist when copied</i>	Very small font writing which is readable when viewed at 5x magnification or greater and illegible when copied. Micro printing may be used as signature line.

Category 2 – Erasure/modification resistance: <i>One or more industry-recognized features designed to prevent the erasure or modification of information written on the prescription by the prescriber.</i>	
Feature	Description
To Prevent Erasure	
Erasure revealing background	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. If someone tries to erase or copy, the consistent background color will look altered and show the color of the underlying paper.
Toner Receptor coating/Toner Lock or color loc paper (erasure resistance for computer generated prescriptions (printed with a laser printer) OR Chemically reactive paper	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. If exposed to chemical solvents, oxidants, acids, or alkalis to alter, the prescription paper will react and leave a mark visible to the pharmacist.
To Prevent Modifications	
Quantity check off boxes and refill Indicator (circle or check number of refills or "NR")	In addition to the written quantity on the prescription, Quantities are indicated in ranges. It is recommended that ranges be 25's with the highest being "151 and over". The range box corresponding to the quantity prescribed MUST be checked for the prescription to be valid. Indicates the number of refills on the prescription. Refill number must be used to be a valid prescription.
Pre-print language on prescription paper. Example: "Rx is void if more than <u>xx</u> Rx's on paper"	Reduces the ability to add medications to the prescription. - Line must be completed for this feature to be valid. Computer printer paper can accommodate this feature by printing "This space intentionally left blank" in an empty space or quadrant.
Quantity and Refill Border and Fill (for computer generated prescriptions on paper only)	Quantities and refill # are surrounded by special characters such as an asterisks to prevent alteration, e.g. QTY **50** Value may also be expressed as text, e.g. (FIFTY), (optional)

Please note that while ONLY one feature from Category 2 is required, it is strongly recommended that one feature of erasure resistance and one feature of modification resistance be used. Inkjet printed prescriptions are de-facto erasure resistant based on the characteristics of inkjet ink.

Category 3 – Counterfeit Resistance: <i>One or more industry-recognized features designed to prevent the use of counterfeit prescription forms.</i>	
Feature	Description
Security features and descriptions listed on prescriptions—this feature is <i>strongly recommended</i> for all prescriptions	Complete list of the security features on the prescription paper for compliance purposes. This is strongly recommended to aid pharmacists in identification of features implemented on prescription.
Security Thread	Metal or plastic threads embedded in paper as used in currency. .
Heat sensing imprint	By touching the imprint or design, the imprint will disappear.
Thermo chromic ink	Ink changes color with temperature change.

Per CMS guidance, pharmacies presented with a prescription on a non-tamper-resistant prescription pad/paper may satisfy the federal requirement by calling the provider’s office and verbally confirming the prescription with the physician or prescriber. The pharmacy shall document through placement on the original non-compliant prescription form or electronically that such communication and confirmation has taken place.

Exclusions to the federal requirement are:

- E-prescriptions transmitted to the pharmacy;
- Prescriptions faxed to the pharmacy;
- Prescriptions communicated to the pharmacy by telephone by a prescriber;
- Transfer of a prescription between two pharmacies, provided that the receiving pharmacy is able to confirm by facsimile or phone call the authenticity of the tamper-resistant prescription with the original pharmacy;
- Written orders prepared in an institutional setting (which include Intermediate Care Facilities and Nursing Facilities), provided that the beneficiary never has the opportunity to handle the written order and the order is given by licensed staff directly to the dispensing pharmacy;
- Drugs dispensed or administered directly to the beneficiary in the physician’s office or clinic;
- Written prescriptions dispensed to MS Medicaid beneficiaries who become retroactively eligible after April 1, 2008, provided the prescription was filled on or after April 1, 2008, and before the beneficiary became retroactively eligible for MS Medicaid;
- Emergency fills, provided that the prescriber provides a verbal, faxed, electronic or compliant written prescription within 72 hours;
- Refills of written prescriptions presented at a pharmacy before April 1, 2008;
- Part D excluded drugs paid for by Medicaid must be executed on tamper-resistant pad/paper.

It is the responsibility of providers to assure that their prescription pads and/or printed prescriptions contain at least one industry–recognized feature in each of the three categories listed above. Prescribers should also contact their prescription pad vendor to secure an appropriate supply of TRPP supplies to meet the requirements by October 1, 2008.

DOM’s webpage has been updated to reflect new CMS guidance, including but not limited to, revised FAQs, examples of handwritten prescriptions and/or computer generated prescriptions meeting all three categories for Medicaid agencies, and Pharmacy Check List, may be found on the Agency’s website at www.medicaid.ms.gov; go to Pharmacy Service’s webpage and select TRPP.