**EDITED WITH REGULATIONS FROM PENNSYLVANIA MEDICAL SOCIETY**

**All physicians prescribing, administering or dispensing drugs for new prescriptions must adhere to the following procedures:**

* **Conduct Medical History and Physical Exam.** Prior to issuing the prescription(s) to the patient, conduct an initial medical history and physical examination[[1]](#footnote-2), unless emergency circumstances justify otherwise.[[2]](#footnote-3)
* **Emergency prescriptions.** In the case of an emergency contact from a known patient, a prudent, short-term prescription for a drug may be issued. Neither a refill nor a consecutive issuance of this emergency prescription may be given unless a physical examination and evaluation of the patient is first conducted by a licensed health care provider. [[3]](#footnote-4)
* **Query the PDMP Database.** If prescribing a controlled substance, query the Pennsylvania Department of

Health’s Prescription Drug Monitoring Program (PDMP) Database for the patient:[[4]](#footnote-5)

* the first time the patient is prescribed the controlled substance for the purposes of establishing a baseline and a through medical record; **or**
* if the physician believes or has reason to believe, using sound clinical judgment, that a patient may be abusing or diverting drugs.
* **Check for Drug Interactions.** Ensure that there are no allergies or drug interactions for the drug to be prescribed, administered, or dispensed.
* **Counsel the Patient.** Counsel the patient regarding the condition diagnosed and the drug prescribed, administered, or dispensed. Patient must be specifically counseled about the following:[[5]](#footnote-6) o Dosage levels o Instructions for use o Frequency and duration of use o Possible side effects
* **Update the Patient’s Medical Record.** Document the evaluation and care received by the patient in the patient’s medical record. For initial prescriptions and/or dispensing, the medical record must include the following:6 o A specification of the symptoms observed by the licensed health care provider and reported by patient. o The diagnosis of the condition for which the drug is being given. o The directions given to the patient for the drug. o The name, strength and quantity of the drug.
* The date on which the drug was prescribed and/or dispensed.
* The information obtained from the PDMP Database, if:
  + the individual is a new patient, or
  + the prescriber determines a drug should not be prescribed or furnished to a patient based upon the information in the system.[[6]](#footnote-7)
* **Price the Medication.** Provide patient with price of medication prescribed.
* **Enter Prescription into the Pharmacy Software.** Prescribe medication in Electronic Health Record (EHR)/Pharmacy Software. Physician enters prescription request through HER software OR:
* Staff enters prescription request. Physician is notified via email from EHR/Pharmacy software for approval.
* Physician responds to email and approves prescription. o Print label for prescription from EHR/Pharmacy Software.
* **Provide Package Insert.** Email patient prescription drug packaged insert developed by EHR/Pharmacy for dispensed prescription.
* **Record NDC and Order Quantity.** Ensure that EHR/ Pharmacy software records National Drug Code (NDC) number and quantity of medication ordered. If EHR /pharmacy software is not available, documentation is still required.
* **Dispense or Order Medication.** o **In Stock Medication:** If prescription isin stock, dispense the prescribed medication to the patient per the dispensing guidelines.
* **Out of Stock Medication:** If prescription isnot in stock, order the prescribed medication for patient per the ordering guidelines. Once order is received, dispense prescribed medication to patient per dispensing guidelines.

**All physicians prescribing, administering or dispensing drugs for refills must adhere to the following procedures:**

* Corroborate the refill request. Check the patient’s chart to ensure medication requested for refill is consistent with the name of med/dose/frequency already listed in patient’s medication list.
* **Query the PDMP Database.** If prescribing a controlled substance, query the Pennsylvania Department of Health’s Prescription Drug Monitoring Program (PDMP) Database for the patient if the physician believes or has reason to believe, using sound clinical judgment, that a patient may be abusing or diverting drugs. [[7]](#footnote-8)
* **Check for Drug Interactions.** Ensure that there are no allergies or drug interactions for the drug to be prescribed, administered, or dispensed.
* **Counsel the Patient.** Counsel the patient regarding the condition diagnosed and the drug prescribed, administered, or dispensed. Patient must be specifically counseled about the following:[[8]](#footnote-9) o Dosage levels o Instructions for use o Frequency and duration of use o Possible side effects
* **Update the Patient’s Medical Record.** Document the evaluation and care received by the patient in the patient’s medical record. For initial prescriptions and/or dispensing, the medical record must include the following:[[9]](#footnote-10) o A specification of the symptoms observed by the licensed health care provider and reported by patient. o The diagnosis of the condition for which the drug is being given. o The directions given to the patient for the drug. o The name, strength and quantity of the drug.
* The date on which the drug was prescribed and/or dispensed.
* The information obtained from the PDMP Database, if:
  + the individual is a new patient, or
  + the prescriber determines a drug should not be prescribed or furnished to a patient based upon the information in the system.[[10]](#footnote-11)
  + each time the patient is prescribed an opioid drug product or benzodiazepine by the physician
* **Price the Medication.** Provide patient with price of medication prescribed.
* **Enter Prescription into the Pharmacy Software.** Prescribe medication in Electronic Health Record (EHR)/Pharmacy Software. Physician enters prescription request through EHR software OR:
* Staff enters prescription request. Physician is notified via email from EHR/Pharmacy software for approval.
* Physician responds to email and approves prescription. o Print label for prescription from EHR/Pharmacy Software.
* **Provide Package Insert.** Email patient prescription drug packaged insert developed by EHR/Pharmacy for dispensed prescription.
* **Record NDC and Order Quantity.** Ensure that EHR/ Pharmacy software records National Drug Code (NDC) number and quantity of medication ordered. If EHR /pharmacy software is not available, documentation is still required.
* **Dispense or Order Medication.** o **In Stock Medication:** If prescription isin stock, dispense the prescribed medication to the patient per the dispensing guidelines.
* **Out of Stock Medication:** If prescription isnot in stock, order the prescribed medication for patient per the ordering guidelines. Once order is received, dispense prescribed medication to patient per dispensing guidelines.

When dispensing **pills, tabs or capsules**, please do the following:

* **Review and Compare labels.** Review and compare the following information on the label printed for the prescribed medication and the information on the stock bottle: (1) the name of medication prescribed; (2) the dose of pills, tabs, capsules (3) the LOT number; (4) the expiration date; (5) manufacturer and, (6) the name of the prescribing provider.

 ***PLEASE NOTE:*** *If prescribed medication is dispensed from two different stock bottles, LOT number of BOTH stock bottles used must appear on label printed for given Rx to be confirmed.*

* **Count prescription.** If pill, tabs or capsules count is 90 or less, count prescribed medication three times. If pills, tabs or capsules count is greater than 90, count prescribed medication four times.
  + ***PLEASE NOTE:*** *If prepackaged stock bottle from manufacturer of 90 dispensed, then stock bottle itself dispensed without opening to count 90. If a stock bottle quantity is equal to dispensed quantity then this quantity is transferred to office medication bottle without counting.*
* **Package prescription.** Fill appropriate safety closure packaging with above. o **Apply label to prescription container.** Apply label to prescription container that will be given to patient.
* **Get Prescription Inspected and Approved.** Set aside stock bottle and labeled bottle with dispensed medication for physician inspection and approval. Physician will inspect matching stock bottle of medication with dispensed bottle of medication via name of med, dose, quantity, LOT number and expiration date.
* **Obtain Patient Signature on duplicate label for confirmation.** Signed duplicate label(s) (or another method confirming pick up) will serve as confirmation that patient picked up medication. Ask patient to sign a duplicate label(s) with the following information: (1) name of medication; (2) quantity; (3) date; (4) patient’s name; (5) patient’s date of birth; (6) dosing instructions; (7) LOT number; and, (8) expiration date of medication prescribed.
* **Maintain record of prescription.** Place signed duplicate label(s) into record book.

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|  | **PROCEDURE WHEN PATIENT IS NOT IN OFFICE** |
|  | **Place prescription in DONE basket.** Place approved container in designated area once reviewed which notifies staff that Rx is approved. |
|  | **Call Patient.** Call patient to inform them that Rx is ready to be picked up. |
|  | **Place prescription in pick-up bin.** Move approved/dispensed bottle into another separately designated area, where medication dispensed are organized alphabetically for easy retrieval. |
|  | **Obtain Patient Signature.** Obtain Patient Signature on duplicate label (or uses another method) for confirmation and maintain record as described above. |
|  | **Pick up by someone other than patient.** If someone other than patient picks up medication, verbal or written permission is obtained from patient along with the name of the individual picking up the med, recorded in chart and photo ID is checked of individual at time med is picked up at office. This individual signs duplicate medication label (or uses another method) as above. |

When dispensing **liquids**, please do the following:

* **Review and Compare labels.** Review and compare the following information on the label printed for the prescribed medication and the information on the stock bottle: (1) the name of medication prescribed; (2) the dose or concentration (3) the LOT number; (4) the expiration date; (5) manufacturer and, (6) the name of the prescribing provider.
  + ***PLEAE NOTE:*** *If prescribed medication is dispensed from two different stock bottles, LOT number of BOTH stock bottles used must appear on label printed for given Rx to be confirmed.*
* **Bottle prescription.** Measure the amount of liquid medication ordered by physician into graduated cylinder. Pour liquid from graduated cylinder into appropriate bottle.
* **Apply label to prescription container.** Apply label safety closure packaging to be given to patient.
* **Get Prescription Inspected and Approved.** Set aside stock bottle and labeled bottle with dispensed medication for physician inspection and approval. Physician will inspect matching stock bottle of medication with dispensed bottle of medication via name of med, dose, quantity, LOT number and expiration date.
* **Obtain Patient Signature on duplicate label for confirmation.** Signed duplicate label(s) (or another method confirming pick up) will serve as confirmation that patient picked up medication. Ask patient to sign a duplicate label(s) with the following information: (1) name of medication; (2) quantity; (3) date; (4) patient’s name; (5) patient’s date of birth;

(6) dosing instructions; (7) LOT number; and, (8) expiration date of medication prescribed.

* **Maintain record of prescription.** Place signed duplicate label(s) into record book.

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|  | **PROCEDURE WHEN PATIENT IS NOT IN OFFICE** |
|  | **Place prescription in DONE basket.** Place approved container into in designated area once reviewed which notifies staff that Rx is approved. |
|  | **Call Patient.** Call patient to inform them that Rx is ready to be picked up. |
|  | **Place prescription in pick-up bin.** Move approved/dispensed bottle into another separately designated area, where medication dispensed are organized alphabetically for easy retrieval. |
|  | **Obtain Patient Signature.** Obtain Patient Signature on duplicate label (or uses another method) for confirmation and maintain record as described above. |
|  | **Pick up by someone other than patient.** If someone other than patient picks up medication, verbal or written permission is obtained from patient along with the name of the individual picking up the med, recorded in chart and photo ID is checked of individual at time med is picked up at office. This individual signs duplicate medication label (or uses another method) as above. |

When dispensing **reconstituted medications**, please do the following:

* **Review and Compare labels.** Review and compare the following information on the label printed for the prescribed medication and the information on the stock bottle: (1) the name of medication prescribed; (2) the dose or concentration (3) the LOT number; (4) the expiration date; (5) manufacturer and, (6) the name of the prescribing provider.
  + ***PLEASE NOTE:*** *If prescribed medication is dispensed from two different stock bottles, LOT number of BOTH stock bottles used must appear on label printed for given Rx to be confirmed.*
* **Bottle prescription.** Follow the instructions for reconstitution provided on the prescribed medication. Per instructions, measure the exact amount of liquid into a graduated cylinder. If using H2O, used distilled bottled H2O. Add liquid into stock bottle as directed on instructions, shaking appropriately, if instructed. o **Apply label to prescription container.** Apply label safety closure packaging to be given to patient.
* **Get Prescription Inspected and Approved.** Set aside stock bottle and labeled bottle with dispensed medication for physician inspection and approval. Physician will inspect matching stock bottle of medication with dispensed bottle of medication via name of med, dose, quantity, LOT number and expiration date.
* **Obtain Patient Signature on duplicate label for confirmation.** Signed duplicate label(s) (or another method confirming pick up) will serve as confirmation that patient picked up medication. Ask patient to sign a duplicate label(s) with the following information: (1) name of medication; (2) quantity; (3) date; (4) patient’s name; (5) patient’s date of birth;

(6) dosing instructions; (7) LOT number; and, (8) expiration date of medication prescribed.

* **Maintain record of prescription.** Place signed duplicate label(s) into record book.

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|  | **PROCEDURE WHEN PATIENT IS NOT IN OFFICE** |
|  | **Place prescription in DONE basket.** Place approved container into in designated area once reviewed which notifies staff that Rx is approved. |
|  | **Call Patient.** Call patient to inform them that Rx is ready to be picked up. |
|  | **Place prescription in pick-up bin.** Move approved/dispensed bottle into another separately designated area, where medication dispensed are organized for easy retrieval. |
|  | **Obtain Patient Signature.** Obtain Patient Signature on duplicate label (or uses another method) for confirmation and maintain record as described above. |
|  | **Pick up by someone other than patient.** If someone other than patient picks up medication, verbal or written permission is obtained from patient along with the name of the individual picking up the med, recorded in chart and photo ID is checked of individual at time med is picked up at office. This individual signs duplicate medication label (or uses another method) as above. |

# Ordering Guidelines for medication not in stock

 In preparation to order needed medication:

* Ensure no known drug allergies to existing/new Rx for said patient. Place an order for general office stock, if needed (i.e., not a dedicated Rx for a patient). o Put medication “in cart” on pharmaceutical website.
* Write medication onto office Pharmacy Order List which includes date, patient name, phone number, medication, dose, SIG, amount.

# Ordering Guidelines for medication low in stock/out of stock/new stock med

* Place an order for general office stock, if needed (i.e., not a dedicated Rx for a patient) or would like to carry new med in office stock.
* Put medication “in cart” on pharmaceutical website.
* Write medication onto office Pharmacy Order List which includes date, medication, dose, amount.
* Update pharmacy cart daily to reflect Pharmacy Order List from that day.
* Pharmacy Order List is reviewed with physician, reconciled with cart for pharmaceutical supplier.
* Physician approves Pharmacy Order List and cart submitted for order based on ordering schedule specific for the office.
* Date of order is marked for each med on Pharmacy Order List

# Shipment receiving and inventory

* Order is reviewed by ensuring invoice matches shipment by matching medication name, dose, quantity, number of bottles of medication ordered.
* Invoice is filed in office.
* Order is inventoried and recorded in EHR or pharmacy software by inputting information:

Medication name

NDC Code

Expiration Date

Lot Number

Quantity/Price

* Enter lot number based on what is on actual bottle, not the box it may or may not come in.
* Must record NDC and/or Lot numbers with proper case sensitive lettering.
* Date order received is marked on office Pharmacy Order List.
* Section II.-Dispensing Guidelines followed as above.
* Each Rx filled is marked “ready” in column on Pharmacy Order List.
* Date Rx picked up is marked on Pharmacy Order Sheet.

# Filling Rx’s from outside office/physician

* Patient will present Rx from outside office/physician to GHDFC.
* Physician will corroborate medication name, strength of dose, dosing instructions with medication list on patient’s chart.
* If medication not already existing on patient’s medication list in chart, then physician or staff will call physician who prescribed said medication, speak to physician or staff member from that office, corroborate medication name, strength of dose, dosing instructions, quantity to be dispensed, refills with that office or locate same information in consultant letter.
* Physician will review this information, ensure no allergies or interactions to medication being requested.
* Physician will prescribe medication according to Section I. Rx Request and Section II. Dispensing Guidelines of this policy.

1. The physical examination shall include an objective evaluation of the heart, lungs, blood pressure and body functions that relate to the patient's specific complaint. Medical history and physical examination information recorded by another licensed health care provider may be considered if the medical history was taken and the physical examination was conducted within the immediately preceding 30 days. [↑](#footnote-ref-2)
2. 49 Pa. Code 16.92(b)(1). [↑](#footnote-ref-3)
3. Id. 16.92(b)(5). [↑](#footnote-ref-4)
4. 35 P.S. 872.8(a). [↑](#footnote-ref-5)
5. 49 Pa. Code 16.92 (b)(3). 6 Id at (b)(4)(i). [↑](#footnote-ref-6)
6. 35 P.S. 872.8(b). [↑](#footnote-ref-7)
7. 35 P.S. 872.8(a). [↑](#footnote-ref-8)
8. 49 Pa. Code 16.92 (b)(3). [↑](#footnote-ref-9)
9. Id at (b)(4)(i). [↑](#footnote-ref-10)
10. 35 P.S. 872.8(b). [↑](#footnote-ref-11)