



P R O V I D E R B U L L E T I N

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To: All Pharmacy Providers and Prescribing Practitioners

**Subject: Tamper-Resistant Prescription Pads (TRPPs) –
Additional Information**

Overview

This bulletin is to provide additional information regarding the implementation of federally-required “tamper resistant prescription pads” for certain Medicaid fee-for-service prescriptions. We issue this bulletin because of the federal requirement that as of October 1, 2008 (referred to as TRPP “Phase II”), those prescriptions must contain three characteristics as set forth by CMS and described in prior bulletins.

Note: As we have stated in previous communications, the federal TRPP requirements are met if prescribers use Indiana Board of Pharmacy security prescription blanks. If you as a prescriber are doing so, no further action is required in follow up to this bulletin.

The following bullet point list summarizes this issue to date, provides you with references to prior communications on this topic, and relates new information regarding TRPPs.

- In essence, the first phase of TRPPs implementation required prescribers to use prescription blanks containing *at least one* industry-recognized feature from *one* federally-specified category of tamper resistance. This second phase requires that the effected Medicaid prescriptions contain *at least one* industry-recognized feature from *each of the three* federally-specified categories of tamper resistance. ***Again, we stress that prescribers who utilize Indiana Board of Pharmacy security prescription blanks will be in full compliance with the “Phase II” requirements.***
- Prior banner page notices/bulletins regarding TRPPs, listed in chronological order, are as follows:
 - [BR200733](#), dated August 14, 2007
 - [BT200724](#), dated September 18, 2007
 - [BR200741](#), dated October 9, 2007
 - [BT200810](#), dated February 22, 2008

Rather than restate the TRPP requirements noted in those publications, we encourage providers to review those documents and the additional information sources they referenced.

- With specific reference to [BT200810](#), there was information in that bulletin addressing **computer generated (i.e., generated by an electronic medical record or e-prescribing application) prescriptions**. CMS had initially determined that special copy-resistant paper would likely be required to meet October 1, 2008 compliance, but has since determined that while such paper *may* be used to achieve copy resistance, **it is not necessary**. CMS advised as per the following:

While special paper may be used to achieve copy resistance, it is not necessary. Electronic medical record (EMR) or ePrescribing generated prescriptions may be printed on plain paper and be fully compliant with all three categories of the tamper-resistant regulations presuming they contain at least one feature from each of the three categories. When feasible, any other industry recognized feature that is designed to prevent unauthorized copying of a completed or blank prescription form may also be utilized on a plain paper computer generated prescription. Since issuing its last guidance on this issue, CMS has determined that at least two such features utilized to prevent passing a copied prescription as an original can also be incorporated into plain paper computer generated prescriptions. The first of these is microprinting, which is the use of very small font that is readable when viewed at 5x magnification or greater, and illegible when copied. The second feature is a "void" pantograph accompanied by a reverse "Rx", which causes a word such as "Void," "Illegal," or "Copy" to appear when the prescription is photocopied. Except where state law mandates the word "Void" or "Illegal", it is recommended that the pantograph show the word "Copy" if the prescription is copied.

This information can be accessed at the bottom of page 5 / top of page 6 of CMS "FAQs" publication regarding TRPPs, located at: <http://www.cms.hhs.gov/DeficitReductionAct/Downloads/MIPTRPFAQs9122007.pdf>

Contact Information

Please refer all questions regarding the subject matter of this bulletin to Customer Assistance at (317) 655-3240 in the Indianapolis local area, or toll-free at 1-800-577-1278.

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