

We would like to congratulate Tom Anderson Owner/Pharmacist of McBain Pharmacy on his retirement.

As many of you know McBain Pharmacy has been our Pharmacy provider. With Tom's retirement it was necessary to obtain a new Pharmacy provider.

Accordingly, we are pleased to announce Munson Community Health Center (MCHC) as our new Pharmacy provider.

### **Assisted Living and Resident Prescriptions**

#### **State Board of Pharmacy Rules:**

The Michigan Board of Pharmacy does not recognize the Assisted Living care environment as being exempt from the normal requirements for the writing of a prescriptions. This is in contrast to "institutional practice" (i.e., hospitals and skilled nursing facilities Rule 16) where orders written on a patient chart are considered legitimate prescriptions. The exception is controlled substance prescriptions written for skilled nursing facility residents where the DEA still requires a separate written prescription.

As such a prescription for an Assisted Living resident must meet all of the requirements of a normal retail prescription:

1. No more than four (4) orders per prescription blank or document
2. Name of the patient
3. Date
4. Name of the drug and strength
5. Quantity to be filled at a time
6. Directions for use
7. Number of refills
8. Provider signature, address, telephone and DEA number (if a controlled substance)

#### **Transmitting Prescriptions via Facsimile:**

Prescriptions may be received by a Pharmacy via facsimile transmission. However, specific requirements are laid down by the State Board with regard to considering these prescriptions to be valid. These requirements are primarily to inhibit the use of this technology from being used to divert medications:

1. The facsimile that prints in the Pharmacy must also print at the top of it the name of the provider (or Clinic name) and the transmission telephone number from which it is being sent.
2. The two must match the provider's name or site of practice on the signed prescription.
3. If there is any doubt as to authenticity, the pharmacy is required to call and verify with the provider or their office the transmission of the prescription. As such, it is important to keep documentation of the same in the provider's office in the patient's medical record.

In practice this means that a prescription cannot be faxed to or given to a third party and then faxed from there to the Pharmacy and be considered valid. E-prescribing (as allowed by law) is an easier means of transmitting prescriptions to the Pharmacy directly.

#### **Controlled Substance Prescriptions:**

In the matter of controlled substances, conflicting requirements are present in the regulation. The most stringent of the requirements takes precedent. As such the DEA **does not** currently permit the electronic prescribing of controlled substances, regardless of schedule unless the patient is a resident in a Skilled Nursing Facility or receiving care under Hospice.

It is the MCHC Pharmacy's intention to work with our physicians to assure the maximum level of compliance and the minimum level of risk in the event of a regulatory inspection.