Rx News Bulletin

Bureau of
Narcotics & Dangerous Drugs

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Missouri Department of Health and Senior Services

health.mo.gov/safety/bndd/index.php

Electronic Prescribing Passwords Cannot be Shared

The bureau received some inquiries about practitioners who are allowing other staff to use their passwords or security token in order for co-workers to transmit electronic prescriptions. This is not allowed by law. Passwords and security tokens are not to be shared. Practitioners must make a mandatory report if their electronic prescribing security has been compromised.

21 CFR 1311.02 Practitioner Responsibilities

(a) The practitioner must retain sole possession of the hard token, where applicable, and must not share the password or other knowledge factor, or biometric information, with any other person. The practitioner must not allow any other person to use the token or enter the knowledge factor or other identification means to sign prescriptions for controlled substances. Failure by the practitioner to secure the hard token, knowledge factor, or biometric information may provide a basis for revocation or suspension of registration pursuant to section 304(a)(4) of the Act (21 U.S.C. 824(a)(4).

(b) The practitioner must notify the individuals designated under § 1311.125 or § 1311.130 within one business day of discovery that the hard token has been lost, stolen, or compromised or the authentication protocol has been otherwise compromised. A practitioner who fails to comply with this provision may be held responsible for any controlled substance prescriptions written using his two-factor authentication credential.

When Quillivant XR™ Packaging Conflicts with Dispensing Limits

Section 195.080, RSMo addresses the amounts of controlled substances that may be prescribed and dispensed. If a Schedule II prescription exceeds a 30-day supply, the prescriber must document the medical reason on the prescription.

If a prescription is issued for a quantity of Quillivant™ other than 60ml, 120ml, 150ml, or 180ml manufacturer container, a pharmacist may telephone the prescriber to request authorization to change the quantity to one of these sizes. The pharmacist must document the authorization in the prescription record.

If the dispensing of a manufacturer container results in a greater than 30-day supply, the pharmacist may comply with Section 195.080, RSMo by documenting, “manufacturer packaging” as the medical reason for exceeding a 30-day supply in the prescription record.
The pharmacist does not need to consult the prescriber to make this determination.

In communications with pharmacies and the Missouri Board of Pharmacy, the bureau understands that adjusting the exact dosage of this drug for pediatric patients can be difficult and the drug is only manufactured in certain sizes. There is a requirement that the drug must be dispensed in the manufacturer’s container.

Speed Up Your Application Process for the Busy Season:

The bureau will be entering its annual busy season when we start dealing with applications for all of the resident physicians. There are several things that applicants can do to speed up the processing time to avoid delays.

1. Apply online and click to pay with a credit card. A paper application spends days in the mail, then in a fee receipt office, and then delivered to the bureau for individual data entry. This automatically adds a week or more to the process. Applying online places the application in the database immediately so that it can be reviewed much faster.
2. Make sure all of the required fields and blanks are completed accurately. Incomplete applications are held in a pending status until the applicant responds to the bureau's email with the required information.
3. As required by law, make sure the actual registrant is completing the application, providing the information and submitting it. The application process cannot be delegated to any other person. The registrant must complete and submit the application. If there are any questions, the registrant should contact the bureau. Due to privacy laws, please do not delegate a third party to contact us.

The Seven-Day Supply for Initial Opioid Prescriptions

The Missouri Legislature previously amended Section 195.080, RSMo to limit certain opioid prescriptions. This law only applies in certain situations. This law applies to short term acute care pain, when it is the first prescription for that drug, because the patient has not had that drug within the past 5 months.

There are exceptions if more is needed in the professional judgment of the practitioner. The law exempts treatment for cancer, hospice patients, LTCF patients, palliative care patients and chronic pain.

The bureau receives telephone calls from long term chronic pain patients who have been stable, but their doctors suddenly have greatly reduced their medications because of this new law. This allow exempts chronic pain patients who have already be receiving that medication.

Check It Out

You can find educational documents on the BNDD website at http://health.mo.gov/safety/bndd/publications.php. Documents such as the "CDC Opiate Prescribing Guidelines" and also "Preventing Prescription Fraud" can be viewed.

Your Email Address is Critical for Your Drug Registration

The bureau's application for a state drug registration requires the applicant to provide a direct email where they can be reached. This email is how the bureau will send important information and notices to the registrant. It is important to provide an accurate email that you use and check on a regular basis. Sixty days before your expiration date, the bureau's automated system will send an expiration notice reminder email to your email address to remind you of the expiration date. If you have not provided an accurate address or you are not checking email, this may lead to a registration expiring. The bureau does not share or release email addresses to other companies.

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