

# Be Aware of Prescription Pad and Name Tag Requirements

**By** Grant Miller, DVM, CVMA Director of Regulatory Affairs

**Practices need to be aware of recent changes to regulations pertaining to controlled substance prescription pads and a new law taking affect in 2022 requiring name tags for veterinary staff members.**

### Security Prescription Pad Requirement for Controlled Substance Prescriptions

Twice in the past two years, the state legislature has changed requirements for what must be included on a valid controlled substance prescription. Called "security" prescriptions, these legal documents now have an increased number of features to reduce prescription tampering and fraud. These measures were implemented to curb opioid and other controlled substance abuse. As required by California Health and Safety Code, section 11162.1, these features include:

- (1) A latent, repetitive "void" pattern shall be printed across the entire front of the prescription blank; if a prescription is scanned or photocopied, the word "void" shall appear in a pattern across the entire front of the prescription
- (2) A watermark shall be printed on the backside of the prescription blank; the watermark shall consist of the words "California Security Prescription"
- (3) A chemical void protection that prevents alteration by chemical washing
- (4) A feature printed in thermochromic ink
- (5) An area of opaque writing so that the writing disappears if the prescription is lightened
- (6) A description of the security features included on each prescription form
- (7) (A) Six quantity checkoff boxes shall be printed on the form so that the prescriber may indicate the quantity by checking the applicable box where the following quantities shall appear: 1–24, 25–49, 50–74, 75–100, 101–150, 151 and over
  - (B) In conjunction with the quantity boxes, a space shall be provided to designate the units referenced in the quantity boxes when the drug is not in tablet or capsule form
- (8) Prescription blanks shall contain a statement printed on the bottom of the prescription blank that the "Prescription is void if the number of drugs prescribed is not noted"

(9) The preprinted name, category of licensure, license number, federal controlled substance registration number, and address of the prescribing practitioner

(10) Checkboxes shall be printed on the form so that the prescriber may indicate the number of refills ordered

(11) The date of origin of the prescription

(12) A checkbox indicating the prescriber's order not to substitute

(13) An identifying number assigned to the approved security printer by the Department of Justice

(14) (A) A checkbox by the name of each prescriber when a prescription form lists multiple prescribers

(B) Each prescriber who signs the prescription form shall identify themselves as the prescriber by checking the box by their name

(15) A uniquely serialized number, which must be utilizable as a barcode that may be scanned by dispensers and must be compliant with current National Council for Prescription Drug Program Standards

Requirement number 15 above includes the two most recent additions to the security prescription requirements. The addition of the uniquely serialized number was added in 2019, and then the barcode was added in 2020.

The California Attorney General's office approves select printing companies to print security prescription pads. A list of the approved providers may be found at: <https://oag.ca.gov/security-printers/approved-list>.

Controlled substance prescriptions may only be filled by pharmacies pursuant to receipt of a valid security prescription. While Schedule III-V controlled substances may be prescribed by verbal authorization, Schedule II controlled substance prescriptions may only be filled through the use of a printed security prescription. Prescribers are encouraged to check their prescriptions to ensure that both the unique serial number and barcode are present. If not, new pads may be ordered from an approved security prescription printer.

### New Name Tag Requirement: January 1, 2023

Pursuant to Assembly Bill 1535, select veterinary staff members will be required to wear name tags when interacting with the public. The law states:

4826.3. (a) Notwithstanding any law, a veterinary technician, veterinary assistant, and veterinary assistant controlled substances permitholder registered in this state shall wear a name tag identification in at least 18 point type in any area of the veterinary premises that is accessible to members of the public. The name tag shall include the veterinary technician, veterinary assistant, and veterinary assistant controlled substances permitholder's name, and if applicable, the license, registration, or permit type and number issued by the board.

(b) A person subject to the requirement in subdivision (a) may remove the name tag when working with or handling animal patients.

(c) This section shall become operative on January 1, 2023.

Section (c) provides a one-year implementation period to give veterinary practices time to comply with the name tag requirement. Practices may implement name tags anytime in 2022 but are encouraged to do so as soon as possible. ■

## New CVMA Member Benefit

### Discounted Printing

To assist in compliance with both security prescription pad and name tag printing needs, the CVMA is pleased to introduce a new member benefit with The Castle Press, Inc. Providing printing services throughout California, The Castle Press is a security pad printer approved by the California Attorney General and is also familiar with name tag printing requirements. CVMA members may access a 10% discount on a variety of printing needs, including security prescription pads and name tags. In addition, members will receive printing discounts on regular prescription pads, letterhead, appointment reminder cards, and more.

**To access this member benefit, log in to [cvma.net](http://cvma.net) and go to the Membership section, then select Member Benefits and Services.**

[www.castlepress.net/cvma](http://www.castlepress.net/cvma)



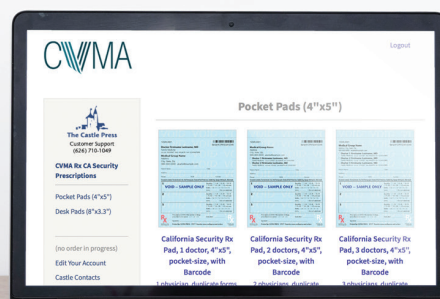
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