



## Changes to Security Prescription Forms Pursuant to AB 1753 – FAQs

**1. Previous communications have indicated that there is no transition period for prescriptions written after January 1, 2019 without a serial number. Who would enforce provisions against dispensers that determine it is in the best interest of the patient to dispense a medication issued on a form that does not include a serialized number.**

**A:** The Enforcement Committee has recommended to the board and to the executive officer that prior to July 1, 2019 the board not make any enforcement priority any investigation or action against a pharmacist who, in the exercise of his or her professional judgment, determines that it is in the best interest of patient or public health or safety to nonetheless fill such prescription.

**2. Many of the security prescription forms printed prior to January 1, 2019 have a serialized number already printed on them. Are the forms compliant if they contain a serialized number, or is it a different number?**

**A:** Prior to January 1, 2019, every batch of controlled substance prescription forms were required to have a lot number printed on the form, as well as a sequential number. They also had to have an identifying number assigned to the approved printer by the Department of Justice. None of these numbers meet the requirement of the new law. The serial new number will be a 15-digit alphanumeric serial number in the following format:

AAANNNNNNANNNNN

(A represents an alpha character and N represents a numeral)

**3. I was presented with a controlled substance prescription form that has a uniquely serialized number printed on it that is consistent with the alphanumeric number format above, but I'm still not sure the prescription form is compliant. Should I refuse to fill it?**

**A:** Always use your best professional judgment when filling prescriptions. However, contacting the prescriber to determine whether the controlled substance prescription form was printed by an approved security printer might assist you in determining if the form is legitimate. The approved list of security printers can be found on the following website: <https://oag.ca.gov/security-printers/approved-list>.

You might also want to consider if any other red flags are present when making your decision. The board's corresponding responsibility brochure can be found using the following link:

[https://www.pharmacy.ca.gov/publications/corresponding\\_responsibility.pdf](https://www.pharmacy.ca.gov/publications/corresponding_responsibility.pdf).

**4. Is the new uniquely serialized number required on e-scripts?**

**A:** No, the requirement does not apply to e-scripts (computer to computer). Prescribers are encouraged to E-prescribe whenever possible.

**5. As a result of AB 1753, the information that must be reported to CURES by a dispensing pharmacy, clinic or other dispenser was amended. Health and Safety Code 11165(d)(11) states, "The serial number for the corresponding prescription form, if applicable" must be reported. Does "if applicable" mean the serial number must be reported only if it is present on the form?**

**A:** No. A uniquely serialized number, in a manner prescribed by the Department of Justice, must be present on all controlled substance prescription forms. "If applicable" refers to those exceptions in which a serial number would not be available: E-scripts, telephone or verbal prescriptions for Schedule III-V controlled substances, faxed prescriptions, or prescriptions dispensed pursuant to HSC sections 11159.2, 11167 or 11167.5.

**6. Will the new controlled substance prescription forms have the new uniquely serialized number as well as all the other numbers that were previously required (lot number, sequential number and number assigned to the security printer)?**

**A:** Yes

**7. Can prescriptions for Schedule III through V controlled substances still be phoned in or faxed to a pharmacy?**

**A:** Yes. There have been no legal changes to the ability to phone in or fax prescriptions for Schedule III through V controlled substances

**8. We print on controlled substances prescription forms from the emergency department at our hospital pursuant to HSC 11162(c). Do we create our own serialized number? How do we get serialized numbers on the secure paper?**

**A:** Your hospital must order new controlled substances prescription forms for use by prescribers when treating patients in your facility. The serialized number is not one of the elements of the form that is exempt under this section.

**9. Providers have been asking me where they should go to get new controlled substance prescription forms with the new serialized numbers. Where can I direct them?**

**A:** The approved list of security printers can be found on the following website:  
<https://oag.ca.gov/security-printers/approved-list>.

**10. If a controlled substance prescription was written in 2018 and has all the elements of a compliant prescription form, except the new serialized number, is it considered compliant?**

**A:** Yes. Only controlled substance prescriptions written on or after January 1, 2019, must have the new serialized number printed on the controlled substance prescription form. Keep in mind that a controlled substances prescription may only be filled within the first six months of issuance.

**11. If a Schedule III-V controlled substance prescription with refills was initially filled in 2018, can it be refilled after January 1, 2019, or do we need to get a new prescription that contains the new serialized number?**

**A:** Only controlled substance prescription forms written on or after January 1, 2019, must have the new serialized number printed on the controlled substance prescription form.

**12. How do we report the new serialized number to CURES?**

**A:** You should contact your computer software vendor. You will need to ensure your system has a way to transmit the 15-digit serialized number to CURES.

**13. If, based on my best judgment, I decide to fill a controlled substance prescription that is compliant in ALL ways, with the exception of the new serialized number, will I get in trouble with the DEA?**

**A:** The change is in the California Health and Safety Code, not federal law. It is our understanding that the DEA enforces only federal law.