

Title: Pharmacy Recordkeeping Requirements and
Integrated Electronic Medical Record Systems

Policy No. I.A.10

Approved: 02-03-2010

Revised:

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1. The Board entertained a request from two hospital pharmacies and a vendor of electronic medical record systems as to the regulatory compliance of their integrated electronic medical record system relative to pharmacy recordkeeping requirements.
 2. Under the historical paradigm of segregated information systems in pharmacies, the recordkeeping rules require that all prescription records be contained within the system and further, the system must be physically limited to the prescription department and further, the authority to access to or manipulation of patient identifiable prescription records requires a credential from this Board. The primary basis for the restriction to personnel licensed by this Board is the level of knowledge required to interpret such existing records as well as enter new prescription orders or other data, and the belief that public safety is best served by such a restriction.
 3. The emergence of integrated systems interfacing with prescription department systems (modules) requires the Board to consider an appropriate public policy that fosters use of electronic medical records that maintains or improves the safety of the medication use process. Given that palpable efficiencies may be achieved by the entry of medication orders outside the pharmacy's module prior to final review and approval by a pharmacist, the Board still believes that public safety is best served by restricting such medication order entry to licensed health care practitioners. Such orders entered external to the pharmacy module should be communicated and placed within the pharmacy module in such a manner to distinguish them from medication orders already entered and approved by pharmacists.
 4. The Board has interpreted its rules on pharmacy recordkeeping systems by approving the following two statements:
 - a. Where an integrated information system is in use, and such system incorporates a pharmacy module operated by a pharmacy licensed by the Board, then the entry of a medication order outside the pharmacy module intended for review and approval by the pharmacist is permitted as long as that medication order is entered by a licensed health care practitioner, and further, such orders entered outside the pharmacy module are communicated to the pharmacy module and then isolated within the pharmacy module and kept separate until the pharmacist has approved the medication order.

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- b. With respect to the documentation of retrieval of medications from medication storage areas, the Board acknowledges that pharmacies in hospital or other organized health care settings hold medications for both dispensing as well as administration. Pharmacies are required to account for the acquisition and disposition of all drugs they hold, therefore, documentation of medications retrieved for administration must be available to the pharmacy. Further, sound professional practice would dictate the availability of a complete record of medications for pharmacist review. Therefore, it would be appropriate for a health care practitioner removing a medication from a medication storage area to document the medication retrieved and administered. Such records are to be construed as a record of medication administered as opposed to a record of medication dispensed, and such records should be identifiable as such in the pharmacy recordkeeping system