

Title: Recordkeeping Requirements for Written
Prescription Forms Received in Pharmacies
By Facsimile or Electronic Images (Advisory Opinion)

Policy No. I.A.23

Approved: 11-14-2018

Revised:

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1. Through its counsel, Sterling Pharmacy in Monroe, La. petitioned the Board for an advisory opinion whether a pharmacy which maintains electronic copies of prescription forms it receives as an electronic image or electronic facsimile is then required to print and maintain a hard copy of those prescription forms merely for recordkeeping purposes.
 2. The petitioner cited §1123 – *Records* of the Board's rules, more specifically Subsection B authorizing the use of an electronic recordkeeping system, Subsection J authorizing the use of an electronic imaging system, and Subsection K authorizing the retention of electronic images of prescription forms.
 3. The Board received the petition during its August 2018 meeting and referred the request to the Regulation Revision Committee for its consideration of the request. The Committee reviewed the rule at issue and received comment from the petitioner during their October 2018 meeting. The Committee developed a recommendation for an advisory opinion and presented to the Board during its November 2018 meeting.
 4. Following their consideration of the Committee's recommendation and subsequent deliberation, the Board adopted the following motion after a unanimous vote in the affirmative of the members present and voting.

Resolved, that the Board interpret LAC 46:LIII.1123.K.3 such that every pharmacy licensed by the Board which receives prescription forms as electronic images or electronic facsimiles directly within the pharmacy dispensing information system shall retain those records for a minimum of two years following the most recent transaction, and further, every such pharmacy may produce a hard copy of such forms but shall not be required to do so merely for recordkeeping purposes.