

PHARMACY UPDATE October 2021

Prescribing Guidelines: ELECTRONIC SIGNATURE & TRANSMISSION

P&P Prescribing Guidelines PP015: Electronic Signature and Transmission

Multiple technologies now allow the physician to electronically sign and transmit a prescription.

Summary of procedure:

		Type of prescription:	
		Electronic prescription	Paper prescription
		Generated through CPOE software	Blank prescription form, pre-printed prescription, etc used in areas where CPOE not deployed
Recipient	CCOMTL pharmacy	Electronic, password-protected, traceable transmission to recipient, which is CCOMTL pharmacy	Manual transmission, but internal. Identification of prescriber can easily be traced.
			Manual signature valid
		Electronic signature valid.	Typed "electronically signed by" valid
			Image of signature valid
	Retail pharmacies outside of the organization	Electronic prescriptions generated through the CPOE software are printed and transmitted to the retail pharmacy by hand or fax. They essentially become paper prescriptions.	
		No electronic transmission to retail pharmacies is possible at this time.	
		Typed "electronic signature by" is NOT valid.	
		Image of signature NOT valid.	
		Prescriber must manually sign prescription.	

Details of procedure:

In accordance with CMQ, OPQ and RAMQ positions, a valid electronic signature and transmission process must have the following 4 features:

- 1) *Identification*: A unique prescriber identifier (ex: a security code)
- 2) *Confirmation*: Proof that signature represents acceptance by the prescriber (ex: confirmation request before submission)
- 3) Traceability: a mechanism that allows to link the prescriber to the document
- 4) *Integrity*: A mechanism ensuring the integrity of the document after it has been electronically signed. No changes to be made after identification by the prescriber.

Internal prescriptions:

Prescriptions written by CIUSSS prescribers, for admitted patients, destined for the CIUSSS pharmacy.

Prescriptions entered in PANDAWebRx and submitted electronically to the internal CIUSSS pharmacy and/or electronic archiving system (Chartmaxx) are valid and accepted, since all 4 criteria are met.

In centers where PANDAWebRx is not yet deployed, prescriptions with other forms of electronic signatures may be used.

Ex: Pharmacy prescription renewal sheet generated by Gespharx8 that is signed electronically by the physician, blank CIUSSS prescription template where prescription is typed and signed electronically by the physicians. These prescriptions are printed and placed in the charts.

Although the electronic signatures do not meet the above 4 criteria and the transmission of these orders to the pharmacy is not electronic, these prescriptions are nonetheless accepted **internally** and do not require the additional manual signature of the prescription.

CIUSSS sites operate often with a small number of physician and pharmacists and prescription identification, confirmation, traceability and integrity is easier to track for these orders.

External prescriptions:

Prescriptions written by CIUSSS prescribers, for patients being discharged or out-patients, destined for retail pharmacies.

Prescriptions generated from PANDAWebRx, or any other software, that are printed and handed to the patient or faxed to a retail pharmacy, do not constitute a valid electronic transmission.

The recipient of those orders are retail pharmacies who have no way of knowing about the security features of the software used to generate them. These paper prescriptions could technically be visually replicated by simple programs (ex: Word).

Therefore, printed electronic prescriptions must be manually signed by the prescriber after printing.

Please note that the image of a manual signature transposed electronically onto a paper prescription does not constitute a valid signature as well.

A prescription generated by a computer, given to a patient or faxed to a retail pharmacy is only valid if the prescriber manually signs it.

If electronic prescriptions are transmitted to retail pharmacies through the DSQ, all 4 criteria are met, and those electronic prescriptions are legal and valid. This is not yet deployed at the CIUSSS COM.

References:

- Dossier médical électronique et transmission des ordonnances. Direction des enquêtes. Collège des Médecins. Feb 2018. http://www.cmq.org/nouvelle/en/dossier-medical-electronique-et-transmission-ordonnances.aspx
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