THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, NY 12234

TO: The Professional Practice Committee

FROM: Frank Muñoz

SUBJECT: Conceptual Discussion of Possible Amendments to the Rules of the Board of Regents Relating to Prescriptions

DATE: February 21, 2011

AUTHORIZATION(S):

Summary

Issue for Discussion

The purpose of this item is to discuss with the Professional Practice Committee proposals relating to (1) the information to be included on prescription forms issued by physicians and other prescribers, and (2) customized patient medication packaging, which is intended to increase patient compliance with complex medication regimens.

Reason(s) for Consideration

Review of Policy.

Proposed Handling

This item is intended to bring to the attention of the Professional Practice Committee emerging issues that have been brought to our attention by the Department of Health and others through conversations with the Board of Pharmacy. Adoption of these proposals would require amendments to the Rules of the Board of Regents.

Background Information

Prescription Forms

Section 29.7(a)(1) of the Rules of the Board of Regents specifies the information that must be provided on every prescription. That information currently includes the name, address, and age of the patient; the strength and quantity of the drug; directions for use; and the name, address, telephone number, profession, and signature of the prescriber.

The State Board of Pharmacy is now recommending that every prescription written in this State be required to include the prescriber's National Provider Identifier (NPI). The NPI is the unique provider identifier required by the federal Health Insurance Portability and Accountability Act (HIPAA). It is used in many prescription drug benefit programs administered by the Department of Health or offered by other providers for a variety of purposes, including validation of the provider's license and quality of care initiatives. The preprint of the individual NPI number on the prescription form will allow pharmacies to easily obtain the NPI for claims submission purposes. In the past, many programs inappropriately used prescribers' Drug Enforcement Administration (DEA) numbers to identify prescribers. In addition to the fact that it was never intended that the DEA number to be used for this purpose, many professionals do not choose to obtain a DEA number, and other prescribers are not eligible for a DEA number. It was for these reasons that the NPI process was developed.

While engaging in discussions on the NPI, the State Board of Pharmacy and others suggested a concurrent amendment to allow a reformatting of prescription blanks to include a space for the voluntary inclusion of a diagnosis or diagnostic code. Medical errors are estimated to cause as many as 100,000 premature deaths each year. Although medication errors represent a small percentage of all errors, the prescribing, dispensing and administration of incorrect drugs can have devastating, even fatal, results. Unfortunately, with many thousands of drug products on the market, the number of look-alike and sound-alike (LASA) drugs often contribute to these errors. For reference, we have attached a chart of these LASA combinations compiled by the Institute for Safe Medication Practices, keyed to show the very different indications for each (Attachment A). Interestingly, the Medicare and Medicaid programs already require that prescriptions for durable medical equipment contain a diagnosis.

As indicated, these concepts have been broadly discussed. These discussions have included participation by associations representing pharmacists and physicians, as well as the New York State Department of Health. Underscoring the importance of these concepts, we have attached a letter from former Commissioner of Health Richard Daines expressing the Department of Health's support for these concepts (Attachment B).

Customized Patient Packaging

The second proposal being presented for your consideration concerns a method of packaging drugs that is officially referred to as customized patient packaging by the United States Pharmacopeia (USP), the official compendia of standards for drugs in the United States.

In traditional packaging for tablets and capsules, each drug is placed in a vial with a label. An alternative method is unit-dose packaging, in which each capsule or tablet is packaged separately. Customized patient medication packaging is different in that several different drugs are packaged together for administration at the same time of day. Specific labeling would still be required, and certain drugs, such as those that are controlled substances or those that are known to be chemically unstable, would not be permitted in this type of packaging. Likewise, to assure the chemical and therapeutic viability of these medications, once packaged, repackaging would be prohibited, and the

customized patient medication packages would have a 60-day expiration period. To provide additional background information, the USP Guidelines for customized patient packaging are attached (Attachment C).

Customized patient medication packaging would not be appropriate for all patients. It has been proven, however, to increase compliance with complex therapeutic regimens, such as those required for patients with end-stage renal disease or HIV/AIDS. In all cases, it is anticipated that providers, patients, and caregivers will be familiarized with the process and the packaging itself. Customized patient medication packaging may reduce reliance on daily and weekly "pill-minders" that are often packed by patients themselves or by caregivers, with a potential for error that this customized patient packaging would avoid.

Timetable for Implementation

If the concept is approved by the Professional Practice Committee, amendments to the Rules of the Board of Regents will be presented for action later this year.

ISMP's List of *Confused Drug Names*

This list of confused drug names, which includes look-alike and sound-alike name pairs, consists of those name pairs that have been involved in medication errors published in the *ISMP Medication Safety Alert!®* and the *ISMP Medication Safety Alert!® Community/Ambulatory Care Edition*. The errors involving these medications were reported to ISMP through the ISMP Medication Errors Reporting Program (MERP).

This list also contains the names that appear on The Joint Commission's list of look-alike and sound-alike names. The Joint Commission established a National Patient Safety Goal that requires each accredited organization to identify a list of look-alike or sound-alike drugs used in the organization. Those names that appear on The Joint Commission's list have been noted with an asterisk (*) below.

Drug Name	Confused Drug Name
Abelcet*	amphotericin B*
Accupril	Aciphex
aceta**ZOLAMIDE***	aceto**HEXAMIDE***
acetic acid for irrigation	glacial acetic acid
aceto**HEXAMIDE***	aceta**ZOLAMIDE***
Aciphex	Accupril
Aciphex	Aricept
Activase	Cathflo Activase
Activase	TNKase
Actonel	Actos
Actos	Actonel
Adacel (Tdap)	Daptacel (DTaP)
Adderall	Inderal
Adderall	**Adderall** XR
Adderall XR	**Adderall**
Advair*	Advicor*
Advicor*	Advair*
Advicor	Altocor
Afrin (oxymetazoline)	Afrin (saline)
Afrin (saline)	Afrin (oxymetazoline)
Aggrastat	argatroban
Aldara	Alora
Alkeran	Leukeran
Alkeran	**Myl**eran
Allegra	Viagra
Alora	Aldara
ALPRAZolam*	**LOR**azepam*
Altocor	Advicor
amantadine	amiodarone
Amaryl	Reminyl
Ambisome*	amphotericin B*
Amicar*	Omacor*
Amikin	Kineret
a**MIL**oride	am**LODIP**ine
amiodarone	amantadine

Drug Name	Confused Drug Name
am**LODIP**ine	a**MIL**oride
amphotericin B*	Abelcet*
amphotericin B*	Ambisome*
Anacin	Anacin-3
Anacin-3	Anacin
antacid	Atacand
Antivert	Axert
Anzemet	Avandamet
Apresoline	Priscoline
argatroban	Aggrastat
argatroban	Orgaran
Aricept	Aciphex
Aricept	Azilect
aripiprazole	proton pump inhibitors
aripiprazole	rabeprazole
Asacol	Os-Cal
Atacand	antacid
Atrovent	Natru-Vent
Avandamet	Anzemet
Avandia	Prandin
Avandia*	Coumadin*
AVINza	**INV**anz
AVINza*	Evista*
Axert	Antivert
aza**CITID**ine	aza**THIO**prine
aza**THIO**prine	aza**CITID**ine
Azilect	Aricept
B & O (belladonna and opium)	Beano
BabyBIG	HBIG (hepatitis B immune globulin)
Bayhep-B	Bayrab
Bayhep-B	Bayrho-D
Bayrab	Bayhep-B
Bayrab	Bayrho-D
Bayrho-D	Bayhep-B
Bayrho-D	Bayrab

** These drug names are included on The Joint Commission's list of look-alike or sound-alike drug names from which an accredited organization creates it own list to satisfy the requirements of the National Patient Safety Goals. Visit www.jointcommission.org for more information about this Joint Commission requirement.*

ISMP's List of Confused Drug Names

Drug Name	Confused Drug Name
Beano	B & O (belladonna and opium)
Benadryl	benazepril
benazepril	Benadryl
Benicar	Mevacor
Betadine (with providone-iodine)	Betadine (without providone-iodine)
Betadine (without providone-iodine)	Betadine (with providone-iodine)
Bextra	Zetia
Bicillin C-R	Bicillin L-A
Bicillin L-A	Bicillin C-R
Bicitra	Polycitra
Brethine	Methergine
Brevibloc	Brevital
Brevital	Brevibloc
buPROPion	busPIRone
busPIRone	buPROPion
Capadex [non-US product]	Kapidex
Capex	Kapidex
Carac	Kuric
captopril	carvedilol
carBAMazepine	OXcarbazepine
CARBOplatin	CISplatin
Cardura*	Coumadin*
carvedilol	captopril
Casodex	Kapidex
Cathflo Activase	Activase
Cedax	Cidex
ceFAZolin	cefTRIAXone
cefTRIAXone	ceFAZolin
CeleBREX*	CeleXA*
CeleBREX*	Cerebyx*
CeleXA	ZyPREXA
CeleXA*	CeleBREX*
CeleXA*	Cerebyx*
Cerebyx*	CeleBREX*
Cerebyx*	CeleXA*
cetirizine	sertraline
chlordiazePOXIDE	chlorproMAZINE
chlorproMAZINE	chlordiazePOXIDE
chlorproMAZINE	chlorproPAMIDE
chlorproPAMIDE	chlorproMAZINE
Cidex	Cedax
CISplatin	CARBOplatin
Claritin (loratadine)	Claritin Eye (ketotifen fumarate)
Claritin-D	Claritin-D 24
Claritin-D 24	Claritin-D
Claritin Eye (ketotifen fumarate)	Claritin (loratadine)

Drug Name	Confused Drug Name
Clindesse	Clindets
Clindets	Clindesse
clomiPHENE	clomiPRAMINE
clomiPRAMINE	clomiPHENE
clonazePAM	cloNIDine
clonazePAM	LORazepam
cloNIDine	clonazePAM
cloNIDine*	KlonoPIN*
Clozaril	Colazal
Coagulation factor IX (recombinant)	Factor IX Complex, Vapor Heated
codeine	Lodine
Colace	Cozaar
Colazal	Clozaril
colchicine	Cortrosyn
Comvax	Recombivax HB
Cortrosyn	colchicine
Coumadin*	Avandia*
Coumadin*	Cardura*
Cozaar	Colace
Cozaar	Zocor
cycloSERINE	cycloSPORINE
cycloSPORINE	cycloSERINE
Cymbalta	Symbyax
DACTINomycin	DAPTOmycin
Daptacel (DTaP)	Adacel (Tdap)
DAPTOmycin	DACTINomycin
Darvocet*	Percocet*
Darvon	Diovan
DAUNOrubicin*	DAUNOrubicin citrate liposomal*
DAUNOrubicin*	DOXOrubicin*
DAUNOrubicin*	IDArubicin*
DAUNOrubicin citrate liposomal*	DAUNOrubicin*
Denavir	indinavir
Depakote	Depakote ER
Depakote ER	Depakote
Depo-Medrol	Solu-MEDROL
Depo-Provera	Depo-subQ provera 104
Depo-subQ provera 104	Depo-Provera
desipramine	disopyramide
dexmethylphenidate	methadone
Diabenese	Diamox
Diabeta*	Zebeta*
Diamox	Diabenese
Diflucan*	Diprivan*
Dilacor XR	Pilocar
Dilaudid	Dilaudid-5

** These drug names are included on The Joint Commission's list of look-alike or sound-alike drug names from which an accredited organization creates it own list to satisfy the requirements of the National Patient Safety Goals. Visit www.jointcommission.org for more information about this Joint Commission requirement.*

ISMP's List of Confused Drug Names

Drug Name	Confused Drug Name
Dilaudid-5	Dilaudid
dimenhy**DRINATE**	diphenhydr**AMINE**
diphenhydr**AMINE**	dimenhy**DRINATE**
Dioval	Diovan
Diovan	Dioval
Diovan	Zyban
Diovan	Darvon
Diprivan*	Diflucan*
Diprivan	Ditropan
disopyramide	desipramine
Ditropan	Diprivan
DOBUTamine	**DOP**amine
DOPamine	**DOBUT**amine
Doxil	Paxil
DOXOrubicin*	**DAUNO**rubicin*
DOXOrubicin*	**DOXO**rubicin liposomal*
DOXOrubicin*	**IDA**rubicin*
DOXOrubicin liposomal*	**DOXO**rubicin*
Dulcolax (bisacodyl)	Dulcolax (docusate sodium)
Dulcolax (docusate sodium)	Dulcolax (bisacodyl)
DULoxetine	**FLU**oxetine
Durasal	Durezol
Durezol	Durasal
Duricef	Ultracet
Dynacin	Dynacirc
Dynacirc	Dynacin
edetate calcium disodium	edetate disodium
edetate disodium	edetate calcium disodium
Effexor*	Effexor XR*
Effexor XR*	Effexor*
Enbrel	Levbid
Engerix-B adult	Engerix-B pediatric/adolescent
Engerix-B pediatric/adolescent	Engerix-B adult
Enjuvia	Januvia
e**PHED**rine*	**EPINEPH**rine*
EPINEPHrine*	e**PHED**rine*
Estratest	Estratest HS
Estratest HS	Estratest
ethambutol	Ethmozine
Ethmozine	ethambutol
Evista*	**AVIN**za*
Factor IX Complex, Vapor Heated	Coagulation factor IX (recombinant)
Femara	Femhrt
Femhrt	Femara
fenta**NYL**	**SUF**entanil
Fioricet	Fiorinal

Drug Name	Confused Drug Name
Fiorinal	Fioricet
flavoxate	fluvoxamine
Flonase	Flovent
Flovent	Flonase
flumazenil	influenza virus vaccine
FLUoxetine	**PAR**oxetine
FLUoxetine	**DUL**oxetine
fluvoxamine	flavoxate
Folex	Foltx
folic acid*	folinic acid (leucovorin calcium)*
folinic acid (leucovorin calcium)*	folic acid*
Foltx	Folex
fomepizole	omeprazole
Foradil	Fortical
Foradil	Toradol
Fortical	Foradil
gentamicin	gentian violet
gentian violet	gentamicin
glacial acetic acid	acetic acid for irrigation
glipi**ZIDE**	gly**BURIDE**
gly**BURIDE**	glipi**ZIDE**
Granulex	Regranex
guai**FEN**esin	guan**FACINE**
guan**FACINE**	guai**FEN**esin
HBIG (hepatitis B immune globulin)	BabyBIG
Healon	Hyalgan
heparin*	Hespan*
Hespan*	heparin*
HMG-CoA Reductase Inhibitors ("statins")	nystatin
Huma**LOG***	Humu**LIN***
Huma**LOG***	Novo**LOG***
Huma**LOG** Mix 75/25	Humu**LIN** 70/30
Humapen Memoir (for use with Huma**LOG**)	Humira Pen
Humira Pen	Humapen Memoir (for use with Huma**LOG**)
Humu**LIN***	Novo**LIN***
Humu**LIN***	Huma**LOG***
Humu**LIN** 70/30	Huma**LOG** Mix 75/25
Hyalgan	Healon
hydr**ALAZINE***	hydr**OXY**zine*
HYDROcodone*	oxy**CODONE***
Hydrogesic	hydr**OXY**zine
HYDROmorphone*	morphine*
hydr**OXY**zine	Hydrogesic
hydr**OXY**zine*	hydr**ALAZINE***
IDArubicin*	**DAUNO**rubicin*
IDArubicin*	**DOXO**rubicin*

** These drug names are included on The Joint Commission's list of look-alike or sound-alike drug names from which an accredited organization creates it own list to satisfy the requirements of the National Patient Safety Goals. Visit www.jointcommission.org for more information about this Joint Commission requirement.*

ISMP's List of Confused Drug Names

Drug Name	Confused Drug Name
Inderal	Adderall
indinavir	Denavir
inFLIXimab	riTUXimab
influenza virus vaccine	flumazenil
influenza virus vaccine	tuberculin purified protein derivative (PPD)
Inspra	Spiriva
INVanz	AVINza
iodine	Lodine
Isordil	Plendil
isotretinoin	tretinoin
Jantoven	Janumet
Jantoven	Januvia
Janumet	Jantoven
Janumet	Januvia
Janumet	Sinemet
Januvia	Enjuvia
Januvia	Jantoven
Januvia	Janumet
K-Phos Neutral	Neutra-Phos-K
Kaopectate (bismuth subsalcylate)	Kaopectate (docusate calcium)
Kaopectate (docusate calcium)	Kaopectate (bismuth subsalcylate)
Kadian	Kapidex
Kaletra	Keppra
Kapidex	Capadex [non-US product]
Kapidex	Capex
Kapidex	Casodex
Kapidex	Kadian
Keflex	Keppra
Keppra	Kaletra
Keppra	Keflex
Ketalar	ketorolac
ketorolac	Ketalar
ketorolac	methadone
Kineret	Amikin
KlonoPIN*	cloNIDine *
Kuric	Carac
Kwell	Qwell
LaMICtal	LamISIL
LamISIL	LaMICtal
lamiVUDine*	lamoTRIgine*
lamoTRIgine*	lamiVUDine*
lamoTRIgine	levothyroxine
Lanoxin	levothyroxine
Lanoxin	naloxone
lanthanum carbonate	lithium carbonate
Lantus	Lente

Drug Name	Confused Drug Name
Lariam	Levaquin
Lasix	Luvox
Lente	Lantus
leucovorin calcium*	Leukeran*
Leukeran	Alkeran
Leukeran	Myleran
Leukeran*	leucovorin calcium*
Levaquin	Lariam
Levbid	Enbrel
levetiracetam	levofloxacin
levofloxacin	levetiracetam
levothyroxine	lamoTRIgine
levothyroxine	Lanoxin
Lexapro	Loxitane
Lipitor	Loniten
Lipitor	ZyrTEC
lithium carbonate	lanthanum carbonate
Lodine	codeine
Lodine	iodine
Loniten	Lipitor
Lopressor	Lyrica
LORazepam*	ALPRAZolam*
LORazepam	clonazePAM
LORazepam	Lovaza
Lotronex	Protonix
Lovaza	LORazepam
Loxitane	Lexapro
Loxitane	Soriatane
Lunesta	Neulasta
Lupron Depot-3 Month	Lupron Depot-Ped
Lupron Depot-Ped	Lupron Depot-3 Month
Luvox	Lasix
Lyrica	Lopressor
Maalox	Maalox Total Stomach Relief
Maalox Total Stomach Relief	Maalox
Matulane	Materna
Materna	Matulane
Maxzide	Microzide
Menactra	Menomune
Menomune	Menactra
Mephyton	methadone
Metadate	methadone
Metadate CD	Metadate ER
Metadate ER	Metadate CD
Metadate ER	methadone
metFORMIN*	metroNIDAZOLE*

** These drug names are included on The Joint Commission's list of look-alike or sound-alike drug names from which an accredited organization creates it own list to satisfy the requirements of the National Patient Safety Goals. Visit www.jointcommission.org for more information about this Joint Commission requirement.*

ISMP's List of Confused Drug Names

Drug Name	Confused Drug Name
methadone	dexmethylphenidate
methadone	ketorolac
methadone	Mephyton
methadone	Metadate
methadone	Metadate ER
methadone	methylphenidate
Methergine	Brethine
methimazole	metolazone
methylphenidate	methadone
metolazone	methimazole
metoprolol succinate	metoprolol tartrate
metoprolol tartrate	metoprolol succinate
metro**NIDAZOLE***	met**FORMIN***
Mevacor	Benicar
Micronase	Microzide
Microzide	Maxzide
Microzide	Micronase
midodrine	Midrin
Midrin	midodrine
mifepristone	misoprostol
Miralax	Mirapex
Mirapex	Miralax
misoprostol	mifepristone
morphine*	**HYDRO**morphone*
morphine - non-concentrated oral liquid*	morphine - oral liquid concentrate*
morphine - oral liquid concentrate*	morphine - non-concentrated oral liquid*
Motrin	Neurontin
MS Contin*	Oxy**CONTIN***
Mucinex*	Mucomyst*
Mucinex D	Mucinex DM
Mucinex DM	Mucinex D
Mucomyst*	Mucinex*
Myleran	Alkeran
Myleran	Leukeran
naloxone	Lanoxin
Narcan	Norcuron
Natru-Vent	Atrovent
Navane	Norvasc
Neo-Synephrine (oxymetazoline)	Neo-Synephrine (phenylephrine)
Neo-Synephrine (phenylephrine)	Neo-Synephrine (oxymetazoline)
Neulasta	Lunesta
Neulasta	Neumega
Neumega	Neupogen
Neumega	Neulasta
Neupogen	Neumega
Neurontin	Motrin

Drug Name	Confused Drug Name
Neurontin	Noroxin
Neutra-Phos-K	K-Phos Neutral
Nex**AVAR**	Nex**IUM**
Nex**IUM**	Nex**AVAR**
ni**CAR**dipine	**NIFE**dipine
NIFEdipine	ni**CAR**dipine
NIFEdipine	ni**MOD**ipine
ni**MOD**ipine	**NIFE**dipine
Norcuron	Narcan
Normodyne	Norpramin
Noroxin	Neurontin
Norpramin	Normodyne
Norvasc	Navane
Novo**LIN***	Humu**LIN***
Novo**LIN***	Novo**LOG***
Novo**LIN** 70/30*	Novo**LOG** Mix 70/30*
Novo**LOG***	Huma**LOG***
Novo**LOG***	Novo**LIN***
Novo**LOG** FLEXPEN	Novo**LOG** Mix 70/30 FLEXPEN
Novo**LOG** Mix 70/30 FLEXPEN	Novo**LOG** FLEXPEN
Novo**LOG** Mix 70/30*	Novo**LIN** 70/30*
nystatin	HMG-CoA Reductase Inhibitors ("statins")
Occlusal-HP	Ocuflox
Ocuflox	Occlusal-HP
OLANZapine	**QUE**tiapine
Omacor*	Amicar*
omeprazole	fomepizole
opium tincture*	paregoric (camphorated tincture of opium)*
Oracea	Orencia
Orencia	Oracea
Orgaran	argatroban
Ortho Tri-Cyclen	Ortho Tri-Cyclen LO
Ortho Tri-Cyclen LO	Ortho Tri-Cyclen
Os-Cal	Asacol
OXcarbazepine	car**BAM**azepine
oxy**CODONE***	**HYDRO**codone*
oxy**CODONE***	Oxy**CONTIN***
Oxy**CONTIN***	MS Contin*
Oxy**CONTIN***	oxy**CODONE***
paclitaxel	paclitaxel protein-bound particles
paclitaxel protein-bound particles	paclitaxel
Pamelor	Panlor DC
Pamelor	Tambocor
Panlor DC	Pamelor
paregoric (camphorated tincture of opium)*	opium tincture*
PARoxetine	**FLU**oxetine

** These drug names are included on The Joint Commission's list of look-alike or sound-alike drug names from which an accredited organization creates it own list to satisfy the requirements of the National Patient Safety Goals. Visit www.jointcommission.org for more information about this Joint Commission requirement.*

ISMP's List of Confused Drug Names

Drug Name	Confused Drug Name
Patanol	Platinol
Pavulon	Peptavlon
Paxil	Doxil
Paxil	Taxol
Paxil	Plavix
pemetrexed	pralatrexate
Peptavlon	Pavulon
Percocet*	Darvocet*
Percocet	Procet
PENTobarbital	**PHEN**obarbital
PHENobarbital	**PENT**obarbital
Pilocar	Dilacor XR
Platinol	Patanol
Plavix	Paxil
Plendil	Isordil
pneumococcal 7-valent vaccine	pneumococcal polyvalent vaccine
pneumococcal polyvalent vaccine	pneumococcal 7-valent vaccine
Polycitra	Bicitra
pralatrexate	pemetrexed
Prandin	Avandia
Precare	Precose
Precose	Precare
predniso**LONE**	predni**SONE**
predni**SONE**	predniso**LONE**
Pri**LOSEC***	**PRO**zac*
Priscoline	Apresoline
probenecid	Procanbid
Procan SR	Procanbid
Procanbid	probenecid
Procanbid	Procan SR
Procardia XL	Protain XL
Procet	Percocet
Prograf	**PRO**zac
propylthiouracil	Purinethol
Proscar	Provera
Protain XL	Procardia XL
protamine	Protonix
proton pump inhibitors	aripiprazole
Protonix	Lotronex
Protonix	protamine
Provera	Proscar
Provera	**PRO**zac
PROzac	Prograf
PROzac*	Pri**LOSEC***
PROzac	Provera
Purinethol	propylthiouracil

Drug Name	Confused Drug Name
QUEtiapine	**OLANZ**apine
qui**NID**ine	qui**NINE**
qui**NINE**	qui**NID**ine
Qwell	Kwell
rabeprazole	aripiprazole
Razadyne	Rozerem
Recombivax HB	Comvax
Regranex	Granulex
Reminyl	Robinul
Reminyl	Amaryl
Renagel	Renvela
Renvela	Renagel
Reprexain	Zy**PREXA**
Restoril	Risperdal
Retrovir*	ritonavir*
Rifadin	Rifater
Rifamate	rifampin
rifampin	Rifamate
rifampin	rifaximin
Rifater	Rifadin
rifaximin	rifampin
Risperdal	Restoril
risperidone	ropinirole
Ritalin	ritodrine
Ritalin LA	Ritalin SR
Ritalin SR	Ritalin LA
ritodrine	Ritalin
ritonavir*	Retrovir*
ri**TUX**imab	in**FLIX**imab
Robinul	Reminyl
ropinirole	risperidone
Roxanol	Roxicodone Intensol
Roxanol	Roxicet
Roxicet	Roxanol
Roxicodone Intensol	Roxanol
Rozerem	Razadyne
Salagen	selegiline
Sandl**MMUNE**	Sando**STATIN**
Sando**STATIN**	Sandl**MMUNE**
saquinavir	**SINE**quan
saquinavir (free base)	saquinavir mesylate
saquinavir mesylate	saquinavir (free base)
Sarafem	Serophene
selegiline	Salagen
Serophene	Sarafem
SEROquel	**SERO**quel XR

** These drug names are included on The Joint Commission's list of look-alike or sound-alike drug names from which an accredited organization creates it own list to satisfy the requirements of the National Patient Safety Goals. Visit www.jointcommission.org for more information about this Joint Commission requirement..*

ISMP's List of Confused Drug Names

Drug Name	Confused Drug Name
SEROquel	Serzone
SEROquel	**SINE**quan
SEROquel XR	**SERO**quel
sertraline	cetirizine
sertraline	Soriatane
Serzone	**SERO**quel
Sinemet	Janumet
SINEquan	saquinavir
SINEquan	**SERO**quel
SINEquan	Singulair
SINEquan	Zonegran
Singulair	**SINE**quan
sita**GLIP**tin	**SUMA**triptan
Solu-**CORTEF**	Solu-**MEDROL**
Solu-**MEDROL**	Depo-Medrol
Solu-**MEDROL**	Solu-**CORTEF**
Sonata	Soriatane
Soriatane	Loxitane
Soriatane	sertraline
Soriatane	Sonata
sotalol	Sudafed
Spiriva	Inspra
Sudafed	sotalol
Sudafed	Sudafed PE
Sudafed PE	Sudafed
SUfentanil	fenta**NYL**
sulf**ADIAZINE**	sulfi**SOXAZOLE**
sulfi**SOXAZOLE**	sulf**ADIAZINE**
SUMAtriptan	sita**GLIP**tin
SUMAtriptan	zolmitriptan
Symbyax	Cymbalta
Tambocor	Pamelor
Taxol	Taxotere
Taxol	Paxil
Taxotere	Taxol
TEGretol	**TEG**retol XR
TEGretol	Tequin
TEGretol	**TREN**tal
TEGretol XR	**TEG**retol
Tequin	**TEG**retol
Tequin	Ticlid
Testoderm TTS	Testoderm
Testoderm TTS	Testoderm with Adhesive
Testoderm with Adhesive	Testoderm
Testoderm with Adhesive	Testoderm TTS
Testoderm	Testoderm TTS

Drug Name	Confused Drug Name
Testoderm	Testoderm with Adhesive
tetanus diptheria toxoid (Td)	tuberculin purified protein derivative (PPD)
Thalomid	Thiamine
Thiamine	Thalomid
tia**GAB**ine*	ti**ZAN**idine*
Tiazac	Ziac
Ticlid	Tequin
ti**ZAN**idine*	tia**GAB**ine*
TNKase	Activase
TNKase	t-PA
Tobradex	Tobrex
Tobrex	Tobradex
TOLAZamide	**TOLBUT**amide
TOLBUTamide	**TOLAZ**amide
Topamax*	Toprol-XL*
Toprol-XL*	Topamax*
Toradol	Foradil
t-PA	TNKase
Tracleer	Tricor
tra**MAD**ol*	tra**ZOD**one*
tra**ZOD**one*	tra**MAD**ol*
TRENtal	**TEG**retol
tretinoin	isotretinoin
Tricor	Tracleer
tromethamine	Trophamine
Trophamine	tromethamine
tuberculin purified protein derivative (PPD)	influenza virus vaccine
tuberculin purified protein derivative (PPD)	tetanus diptheria toxoid (Td)
Tylenol	Tylenol PM
Tylenol PM	Tylenol
Ultracet	Duricef
valacyclovir	valganciclovir
Valcyte	Valtrex
valganciclovir	valacyclovir
Valtrex	Valcyte
Varivax	VZIG (varicella-zoster immuneglobulin)
Vesanoid	Vesicare
Vesicare	Vesanoid
Vexol	Vosol
Viagra	Allegra
vin**BLAS**tine*	vin**CRIS**tine*
vin**CRIS**tine*	vin**BLAS**tine*
Viokase	Viokase 8
Viokase 8	Viokase
Vioxx	Zyvox
Viracept	Viramune

** These drug names are included on The Joint Commission's list of look-alike or sound-alike drug names from which an accredited organization creates it own list to satisfy the requirements of the National Patient Safety Goals. Visit www.jointcommission.org for more information about this Joint Commission requirement.*

ISMP's List of Confused Drug Names

Drug Name	Confused Drug Name
Viramune	Viracept
Vosol	Vexol
VZIG (varicella-zoster immuneglobulin)	Varivax
Wellbutrin SR*	Wellbutrin XL*
Wellbutrin XL*	Wellbutrin SR*
Xanax*	Zantac*
Xeloda	Xenical
Xenical	Xeloda
Yasmin	Yaz
Yaz	Yasmin
Zantac*	Xanax*
Zantac*	Zyr**TEC***
Zebeta*	Diabeta*
Zebeta	Zetia
Zegerid	Zestril
Zelapar (Zydis formulation)	Zy**PREXA** Zydis
Zestril	Zegerid
Zestril*	Zetia*
Zestril*	Zy**PREXA***
Zetia	Bextra
Zetia	Zebeta
Zetia*	Zestril*
Ziac	Tiazac

Drug Name	Confused Drug Name
Zocor	Cozaar
Zocor*	Zyr**TEC***
zolmitriptan	**SUMA**triptan
Zonegran	**SINE**quan
Zostrix	Zovirax
Zovirax	Zyvox
Zovirax	Zostrix
Zyban	Diovan
Zy**PREXA**	Cele**XA**
Zy**PREXA**	Reprexain
Zy**PREXA***	Zestril*
Zy**PREXA***	Zyr**TEC***
Zy**PREXA** Zydis	Zelapar (Zydis formulation)
Zyr**TEC**	Lipitor
Zyr**TEC***	Zantac*
Zyr**TEC***	Zocor*
Zyr**TEC***	Zy**PREXA***
Zyr**TEC**	Zyr**TEC**-D
Zyr**TEC** (cetirizine)	Zyr**TEC** Itchey Eye Drops (ketotifen fumarate)
Zyr**TEC**-D	Zyr**TEC**
Zyr**TEC** Itchey Eye Drops (ketotifen fumarate)	Zyr**TEC** (cetirizine)
Zyvox	Vioxx
Zyvox	Zovirax

** These drug names are included on the The Joint Commission's list of look-alike or sound-alike drug names from which an accredited organization creates it own list to satisfy the requirements of the National Patient Safety Goals. Visit www.jointcommission.org for more information about this Joint Commission requirement.*

STATE OF NEW YORK
DEPARTMENT OF HEALTH

Corning Tower The Governor Nelson A. Rockefeller Empire State Plaza Albany, New York 12237

Richard F. Daines, M.D.
Commissioner

James W. Clyne, Jr.
Executive Deputy Commissioner

November 12, 2010

Lawrence H. Mokhiber
Executive Secretary, State Board of Pharmacy
Office of the Professions
State Education Building, 2nd Floor
89 Washington Avenue
Albany, New York 12234

Dear Mr. Mokhiber:

We were pleased to learn that the State Board of Pharmacy is considering the addition of the individual National Provider Identifier (NPI) and a space for Diagnosis Code on New York State official prescription forms. This letter reflects the support of the New York State Department of Health (Department) for these changes.

As you know, the Department administers prescription drug benefits to over five million New Yorkers through New York Medicaid, Child Health Plus, and the Elderly Prescription Insurance Coverage Program (EPIC). As the unique provider identifier required by the Health Insurance Portability and Accountability Act (HIPAA), the individual NPI is used in these programs for a variety of claim system edits, including validation of the provider's license and quality of care initiatives. The preprint of the individual NPI number on the prescription form for those prescribers who are covered under HIPAA will allow pharmacies to easily obtain the NPI for claims submission purposes and serves the same purposes as did the preprint of the prescriber's license number. Under this proposal, prescribers who are not subject to HIPAA will not be obligated, but may voluntarily provide their individual NPI on prescriptions.

The Department also supports the voluntary submission of diagnosis code(s) by the prescriber on the prescription form as a way to reduce the risk of medication errors. Diagnosis code is currently a requirement for prescription claims submitted under Medicare Part B and for most claims submitted to Medicaid. In addition to avoiding potential adverse events, the inclusion of a space on the prescription form for the voluntary submission of diagnosis code(s) will reduce the administrative burden and cost of follow-up with beneficiaries and/or providers when this information is needed.

Thank you for the opportunity to submit the Department's views on these important issues. Please contact Dr. James Figge at (518) 474-8045 if we can be of further assistance.

Sincerely,

Richard F. Daines, M.D.
Commissioner of Health

cc: Donna Frescatore
Gregory S. Allen
Janet Elkind
James Figge, M.D., M.B.A.
John Morley, M.D.

to the product where it has been repackaged in a different container. repackaged drugs dispensed pursuant to a prescription are exempt from this expiration date labeling requirement. It is necessary, therefore, that other precautions be taken by the dispenser to preserve the strength, quality, and purity of drugs that are repackaged for ultimate distribution or sale to patients.

The following guidelines and requirements are applicable where official dosage forms are repackaged into single-unit or unit-dose containers or mnemonic packs for dispensing pursuant to prescription.

Labeling—It is the responsibility of the dispenser, taking into account the nature of the drug repackaged, any packaging and beyond-use dating information in the manufacturer's product labeling, the characteristics of the containers, and the storage conditions to which the article may be subjected, to place a suitable beyond-use date on the label. Repackaged dosage forms must bear on their labels beyond-use dates as determined from information in the product labeling. In the absence of stability data or information to the contrary, such date should not exceed (1) 25% of the remaining time between the date of repackaging and the expiration date on the original manufacturer's bulk container, or (2) a six-month period from the date the drug is repackaged, whichever is earlier. Each single-unit or unit-dose container bears a separate label, unless the device holding the unit-dose form does not allow for the removal or separation of the intact single-unit or unit-dose container therefrom.

Storage—Store the repackaged article in a humidity-controlled environment and at the temperature specified in the individual monograph or in the product labeling. Where no temperature or humidity is specified in the monograph or in the labeling of the product, controlled room temperature and a relative humidity corresponding to 75% at 23° are not to be exceeded during repackaging or storage.

A refrigerator or freezer shall not be considered to be a humidity-controlled environment, and drugs that are to be stored at a cold temperature in a refrigerator or freezer shall be placed within an outer container that meets the monograph requirements for the drug contained therein.

CUSTOMIZED PATIENT MEDICATION PACKAGES

In lieu of dispensing two or more prescribed drug products in separate containers, a pharmacist may, with the consent of the patient, the patient's caregiver, or a prescriber, provide a customized patient medication package (patient med pak).[7]

A patient med pak is a package prepared by a pharmacist for a specific patient comprising a series of containers and containing two or more prescribed solid oral dosage forms. The patient med pak is so designed or each container is so labeled as to indicate the day and time, or period of time, that the contents within each container are to be taken.

It is the responsibility of the dispenser to instruct the patient or caregiver on the use of the patient med pak.

Label—

(A) The patient med pak shall bear a label stating:

(1) the name of the patient;

(2) a serial number for the patient med pak itself and a separate identifying serial number for each of the prescription orders for each of the drug products contained therein;

(3) the name, strength, physical description or identification, and total quantity of each drug product contained therein;

(4) the directions for use and cautionary statements, if any, contained in the prescription order for each drug product therein;

(5) any storage instructions or cautionary statements required by the official compendia;

(6) the name of the prescriber of each drug product;

(7) the date of preparation of the patient med pak and the beyond-use date or period of time assigned to the patient med pak (such beyond-use date or period of time shall be not longer then the shortest recommended beyond-use date for any dosage form included therein or not longer than 60 days from the date of preparation of the patient med pak and shall not exceed the shortest expiration date on the original manufacturer's bulk containers for the dosage forms included therein); alternatively, the package label shall state the date of the prescription(s) or the date of preparation of the patient med pak, provided the package is accompanied by a record indicating the start date and the beyond-use date;

(8) the name, address, and telephone number of the dispenser (and the dispenser's registration number where necessary); and

(9) any other information, statements, or warnings required for any of the drug products contained therein.

(B) If the patient med pak allows for the removal or separation of the intact containers therefrom, each individual container shall bear a label identifying each of the drug products contained therein.

Labeling—The patient med pak shall be accompanied by a patient package insert, in the event that any medication therein is required to be dispensed with such insert as accompanying labeling. Alternatively, such required information may be incorporated into a single, overall educational insert provided by the pharmacist for the total patient med pak.

Packaging—In the absence of more stringent packaging requirements for any of the drug products contained therein, each container of the patient med pak shall comply with the moisture permeation requirements for a Class B single-unit or unit-dose container (see *Containers—Permeation* ⟨671⟩). Each container shall be either not reclosable or so designed as to show evidence of having been opened.

Guidelines—It is the responsibility of the dispenser, when preparing a patient med pak, to take into account any applicable compendial requirements or guidelines and the physical and chemical compatibility of the dosage forms placed within each container, as well as any therapeutic incompatibilities that may attend the simultaneous administration of the medications. In this regard, pharmacists are encouraged to report to USP headquarters any observed or reported incompatibilities.

Recordkeeping—In addition to any individual prescription filing requirements, a record of each patient med pak shall be made and filed. Each record shall contain, as a minimum:

(1) the name and address of the patient;

(2) the serial number of the prescription order for each drug product contained therein;

(3) the name of the manufacturer or labeler and lot number for each drug product contained therein;

(4) information identifying or describing the design, characteristics, or specifications of the patient med pak sufficient to allow subsequent preparation of an identical patient med pak for the patient;

(5) the date of preparation of the patient med pak and the beyond-use date that was assigned;

(6) any special labeling instructions; and

(7) the name or initials of the pharmacist who prepared the patient med pak.

[7] It should be noted that there is no special exemption for patient med paks from the requirements of the Poison Prevention Packaging Act. Thus the patient med pak, if it does not meet child-resistant standards, shall be placed in an outer package that does comply, or the necessary consent of the purchaser or physician, to dispense in a container not intended to be child-resistant, shall be obtained.

⟨671⟩ CONTAINERS—PERMEATION

The tests that follow are provided to determine the moisture permeability of containers utilized for drugs being dispensed on prescription. The section *Multiple-unit Containers for Capsules and Tablets* applies to multiple-unit containers (see *Preservation, Packaging, Storage, and Labeling* under *General Notices*). The section *Single-unit Containers and Unit-dose Containers for Capsules and Tablets* applies to single-unit and unit-dose containers (see *Single-unit Containers and Unit-dose Containers for Nonsterile Solid and Liquid Dosage Forms* under *Containers* ⟨661⟩). As used herein, the term "container" refers to the entire system comprising, usually, the container itself, the liner (if used), the closure in the case of multiple-unit containers, and the lidding and blister in the case of single-unit and unit-dose containers.

Where the manufacturer's unopened multiple-unit, single-unit, or unit-dose packages are used for dispensing the drug, such containers are exempt from the requirements of this test.