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ADVISORY

TO: Medication Administration Program Administrators and Registered Sites

FROM: David E. Johnson, Director, Drug Control Program

DATE: February 1, 2023

SUBJECT: Valid Health Care Provider Orders – MAP Sites

This Advisory supersedes the June 19, 2019 Advisory on this topic.

All medications and dietary supplements prescribed for administration by Licensed Staff and Medication Administration Program (MAP) Certified Staff require a Health Care Provider (HCP) order. Prescription medications ordered for administration by MAP Certified staff may not be experimental and must be currently approved by the U.S. Food and Drug Administration for marketing in the United States.

Prescriber Signature

All HCP orders must include the signature of a Valid Authorized Prescriber, registered with the Commonwealth of Massachusetts to prescribe. Acceptable HCP signatures include:

- A “wet” signature (*i.e.*, the order is signed with pen and ink by HCP);
- An “image” of the HCP’s wet signature (*i.e.*, the order, as received, depicts a representation of the HCP’s actual signature); or
- An “electronic” signature. Valid electronic signatures include:
 - An electronic signature generated by the HCP through an electronic system that is compliant with federal law regarding the safety and security of electronic health care records, and is received by the Registered MAP Site in a system which is also compliant and can verify the HCP electronic signature.
 - A written order presented electronically, such as an email, where the HCP intends for the communication to be treated by the MAP Registered Site as an HCP order, and the MAP Registered Site can reasonably attribute the writing to the HCP. This criterion could be met through an HCP email with clear language showing

that it is an HCP order, where the MAP Registered Site has taken steps to confirm that the email address sending the order is the address of the HCP.¹

- For documents signed electronically, the signature and date of execution may appear on the last page only where all pages are fastened or otherwise presented together as one unit.

Order Expiration

HCP orders, including standing orders/protocols, are valid for one year, typically corresponding with an annual preventive health care visit (*e.g.*, annual physical). If an annual visit cannot be scheduled before the order expires, the order may remain valid until the day after the annual visit actually occurs, under the following circumstances:

- An individual's health insurance plan requires a predetermined amount of time between annual physicals (*e.g.*, one year and one day); and
- The Service Provider has made a good faith effort to obtain an appointment with the HCP on the earliest practical date permitted by the insurer.

¹ The process of confirming an HCP's email address need not be taken each time the HCP sends an order via email. However, an HCP's email address should be re-confirmed after a reasonable interval has passed.