

# FL & CA Comparison

	<b>Florida</b>	<b>California</b>
<i>Effective Date</i>	On July 1 2006 it will cover all legend drugs (Any drug labeled “Rx” only).	The pedigree requirement becomes effective January 1, 2007. The Board can elect to extend the time allowed for implementation
<i>Drugs that Require Pedigrees?</i>	On July 1 2006 it will cover all legend drugs (Any drug labeled “Rx” only) with the exception of compressed medical gases or veterinary legend drugs	All “dangerous drugs” meaning any drug unsafe for self-use in humans or animals
<i>Who Must Initiate the Pedigree?</i>	The first wholesale distributor who purchases the legend drug from the original manufacturer must initiate the pedigree beginning with the purchase from the manufacturer.	The manufacturer initiates the pedigree.
<i>What transactions must appear on the pedigree?</i>	Each distribution of any given legend drug, from sale by a pharmaceutical manufacturer, through acquisition and sale by any wholesaler or repackager, until final sale to a pharmacy or other person administering or dispensing.	Any change of ownership of the prescription drug requires documentation of the transaction information on the pedigree.

# FL & CA Comparison (Continued)

	<b>Florida</b>	<b>California</b>
<b>Returns</b>	Any return that is not the a result of an error or occurs within 7 days need not be reflected in the pedigree paper. Any return that is not the a result of an error or occurs after 7 days shall be reflected in the pedigree paper trail for any further distributions	Any returns to a manufacturer or wholesaler, or any other change of ownership, require documentation on the pedigree.
<b>Pharmacies</b>	(1)Authentication may be documented by a written agreement between affiliated group members that each affiliated group member will only transfer prescription drugs purchased directly from the manufacturer to an affiliated group member (2)A licensed pharmacy is not required to authenticate the pedigree unless it will engage in the wholesale distribution of that drug. Medical practitioner and restricted prescription drug distributor – health care entity do not have to authenticate pedigrees	(1)A pharmacy may not acquire any prescription drugs (dangerous drugs) without obtaining a certified pedigree at the time the drugs are acquired. (2)A pharmacy is required to provide a pedigree as part of any transaction resulting in a change of ownership of a given prescription drug (3)A pedigree is not required if the transaction does not result in the change in ownership of the prescription drug
<b>Electronic Pedigrees</b>	Pedigrees can be either electronic or paper	Pedigrees must be electronic