


BHS Policies and Procedures	
 <p>City and County of San Francisco Department of Public Health San Francisco Health Network BEHAVIORAL HEALTH SERVICES</p>	<p>1380 Howard Street, 5th Floor San Francisco, CA 94103 (628) 754-9500 FAX (628) 754-9585</p>
<p>Policy or Procedure Title: Non-Prescriber Order Entry in Epic</p>	
<p>Issued By: DocuSigned by: <i>Maximilian Rocha</i> EB51A346C32641B... Maximilian Rocha, LCSW Director of Systems of Care Date: April 22, 2026</p>	<p>Manual Number: 3.01-09 References: SFDPH 18.04 Order Entry (<i>SFHN Electronic Health Record Inpatient and Outpatient Downtime Playbooks</i>)</p>

Substantive Revision. Amends Policy 3.01-09 of May 1, 2025.

Equity Statement: Behavioral Health Services (BHS) is committed to prioritizing intersectionality, including race, gender identity, sexual orientation, age, class, nationality, language, and ability. BHS strives to become an anti-racist and trauma informed organization. We are committed to ensuring that every policy and procedure leads with an equity lens. We are dedicated to ensuring that our providers are equipped to respond to our members’ diverse needs and lived experiences.

Purpose:

To ensure patient safety and quality of care by reducing potential errors or misinterpretation when orders are communicated in the electronic health record (EHR). Authorizes care team members to place orders at the top of their authorized scope within the EHR.

Background:

DPH allows non-prescribers to enter orders that are appropriate to their scope of practice in the EHR, referred to as Epic orders. This policy was created for Specialty Mental Health Services (SMHS) non-prescribers and was updated in April 2026 to include substance use care team members.

Scope:

This policy and procedure apply to all BHS and BHS-affiliated non-prescriber staff in Epic Hyperspace. Non-prescriber staff include licensed clinical social workers, licensed marriage and family therapists, licensed professional clinical counselors, licensed psychologists (PsyD and PhD), associate clinical social workers, associate marriage family therapists, associate professional clinical counselors, waived PsyD and PhD, clinical trainees (interns), registered nurses, licensed vocational nurses, licensed psychiatric technicians, licensed non-prescriber pharmacists, clinic pharmacy technicians, health workers, medical assistants, clerks, eligibility workers, peer support specialists, residential program counselors, mental health workers, mental health specialists, alcohol and other drugs (AOD) counselors, and occupational therapists.

Policy:

Behavioral Health Services (BHS) complies with the Department of Public Health’s (DPH) policy on Order

Entry (refer to SFHN Electronic Health Record Inpatient and Outpatient Downtime Playbooks).

1. BHS complies with all State and Federal laws and regulations governing prescribing, electronic prescribing activities and member health records.
2. BHS complies with the Department of Public Health's (DPH) policy on Order Entry for Epic Hyperspace users.
3. BHS allows non-prescribers to place clinically appropriate orders at the top of their authorized scope, after appropriate training. Specific types of order that can be entered by staff are listed in Appendixes B, C, and D.
4. BHS requires that orders requiring prescriber cosign must be cosigned by a prescriber.

Procedure:

A. Provider orders:

1. All orders should be placed electronically with a provider signature or co-signature except during downtime.
 - a. Refer to SFHN Electronic Health Record Inpatient and Outpatient Downtime Playbooks for downtime ordering information.
 - b. Non-Computerized Provider Order Entry (CPOE) orders shall be immediately faxed to the pharmacy.
2. Each order must be reviewed prior to acknowledging, verifying, and/or initiating.
 - a. Provider orders are acknowledged by staff legally authorized to accept orders per their scope of practice.
 - b. For orders that require clarification, acknowledge but do not carry out the order. Communicate with the ordering provider and document your concerns as appropriate.

B. Orders entered, modified, or discontinued by non-prescribers:

1. Any order placed by a non-prescriber that requires a prescriber cosign must be cosigned.
2. Orders Entered by Non-Prescribers:
 - a. Telephone Orders
 - i. Telephone orders refer to those situations in which the ordering provider is not physically present when providing patient care orders. With telephoned orders, the practitioner may be in another location within the facility, or outside the facility.
 - ii. Telephone orders are only accepted by staff legally authorized to take telephone orders within their scope of practice and are limited to those orders that are within their scope of practice (e.g. Registered Nurses, Licensed Vocational Nurses, Licensed Psychiatric Technicians, Registered Pharmacists, and Residential Program Counselors.
 - iii. Any telephone orders are entered immediately and read back to the ordering provider upon transcription.
 - iv. In both outpatient and residential programs, telephone orders are only accepted when there is no available provider onsite and when the on-call provider is unable to enter electronic orders remotely in the EHR.
 - v. In both outpatient and residential programs, the provider who initially dictated the telephone order must cosign these orders within 72 hours.

3. Per protocol: no cosign required and Per protocol: cosign required.
 - a. "Protocol" within Epic refers to any of the following:
 - i. Per protocol, no cosign required in the following scenario:
 - a. Standardized procedures and protocols are developed collaboratively by interdisciplinary teams, including providers and nurses, and approved through MUIC and the BHS Co-Chief Medical Directors.
 - b. Orders for services that do not legally require a provider order, including non-provider driven consults and referral orders. These do not require a provider cosign in Epic.
 - ii. Per protocol, cosign required in the following scenario:
 - i. Protocol not utilizing standardized procedure development, but specifically guided by DPH policy.
 - ii. Ordered during downtime.
 - a. Review downtime policy for specific downtime requirements. For outpatient programs, refer to SFHN's Electronic Health Record (Outpatient) Downtime Playbook. For residential programs, refer to SFHN's Electronic Health Record (Inpatient) Downtime Playbook.
 - iii. Transcribed from paper: See downtime policy for transcription procedure.

Definitions:

- STAT: Orders are carried out within one (1) hour of order start time.
- Routine orders: Orders that do not specify "stat" should be acknowledged within two (2) hours of order entry for outpatient programs and within four (4) hours of order entry for residential programs.
- Ordering provider: The ordering provider is the practitioner who chooses to place the order. The ordering provider will vary depending on the order mode. For example, a nurse can be the ordering provider for a "per protocol" order but the provider (MD, DO, NP, PA, PharmD) is the ordering provider for a telephoned order.
- Authorizing provider: The authorizing provider is the practitioner whose name is selected as "authorizing". This field is generally the same as the ordering provider, except in situations where one practitioner is supervising the activities of another provider due to facility policy or billing requirements.
- Computerized Provider Order Entry (CPOE): The process of providers entering and sending treatment instructions, including medication, laboratory, and radiology orders – via the EHR rather than paper, fax, or telephone.
- Licensed Practitioners of the Healing Arts (LPHA) Prescribers: Include physicians, nurse practitioners, physician assistants, and registered pharmacists with either Advanced Pharmacist Practitioner License (APh) or a collaborative practice agreement (CPA).
- LPHA and Waivered LPHA Non-Prescribers: Include licensed clinical social workers, licensed marriage and family therapists, licensed professional clinical counselors, psychologists (PsyD and PhD), associate clinical social workers, associate marriage family therapists, associate professional clinical counselors, and waivered PsyD and PhD.
- Other Non-Prescribers: Include registered nurses, licensed vocational nurses, clinic pharmacy technicians, health workers, medical assistants, clerks, eligibility worker, peer support

specialists, alcohol and other drugs (AOD) counselors, occupational therapists, clinical trainees (interns), non-prescriber pharmacists, and residential program counselors.

- Residential Program Counselors: Include mental health workers and mental health specialists in a residential program setting.

Contact Person: Director of Clinical Informatics, (628) 754-9526

Attachment(s):

- Appendix A: Epic Order Entry Signature Screen for Non-Prescribers
- Appendix B: List of Orders for Outpatient Programs with Prescribers
- Appendix C: List of Orders for Outpatient Programs with OUT Prescribers, including Court Programs
- Appendix D: List of Orders for Residential Programs with Prescribers

Distribution:

BHS Policies and Procedure are distributed by BHS Quality Management and Regulatory Affairs.

Administrative Manual Holders

BHS Programs

SOC Program Managers

BOCC Program Managers

CDTA Program Managers

Appendix A: Epic Order Entry Screen for Non-Prescribers

The screenshot shows the 'Providers' window in Epic's order entry system. It is divided into several sections: 'Ordering Information', 'Ordering provider', 'Authorizing Providers', and 'Entry Comments'. The 'Ordering Information' section includes a dropdown for 'Order mode' with 'Per protocol: cosign required' selected, and four buttons: 'Per protocol: cosign required' (highlighted in green), 'Per protocol: no cosign required', 'Telephone with readback', and 'Ordered during downtime'. The 'Ordering provider' section shows a dropdown with 'Non-Prescriber User' selected. The 'Authorizing Providers' section has two search fields: 'For procedures' (with a red exclamation mark icon) and 'For medications'. The 'Entry Comments' section is a large text area. At the bottom, there are 'Accept' and 'Cancel' buttons. Three red arrows point from text boxes on the right to the 'Order mode' dropdown, the 'Ordering provider' dropdown, and the 'For procedures' search field.

Ordering Information

Order mode

Per protocol: cosign required

Per protocol: cosign required Per protocol: no cosign required Telephone with readback Ordered during downtime

Ordering provider

Non-Prescriber User

Authorizing Providers

For procedures

For medications

Entry Comments

User selects the Order Mode

Defaulted

User enters the Authorizing Provider

Appendix B: List of Orders for Outpatient Programs with Prescribers

A list of orders that can be placed by a non-prescriber, and the order mode that should be used for this process.

Order	Who can write, modify, and/or discontinue this order?	Order Mode	Orders Authorizing Provider	Additional Details
Ambulatory referral and E-consult orders	<ul style="list-style-type: none"> • Registered Nurse • Licensed Vocational Nurse • Licensed Psychiatric Technician • Medical Assistant • Health Worker • Eligibility Worker • Clerk • Peer Support Specialist • Occupational Therapist 	Per protocol NO co-sign required	Program prescriber or LPHA	
	<ul style="list-style-type: none"> • Clinical Trainee 	Per protocol NO co-sign required	Supervising LPHA	
	<ul style="list-style-type: none"> • LPHA • Waivered/Registered LPHA • Mental Health Worker • Mental Health Specialist • AOD Counselor 	Per protocol NO co-sign required	Ordering user	
Diagnostic orders – radiologic/labs (collected/performed by an external agency)	<ul style="list-style-type: none"> • Registered Nurse • Licensed Vocational Nurse • Licensed Psychiatric Technician • Medical Assistant • Clinic Pharmacy Technician 	Per protocol co-sign required	Program prescriber	

<p>Clinic-Administered Medications (CAM)</p>	<ul style="list-style-type: none"> • Registered Nurse • Licensed Vocational Nurse • Licensed Psychiatric Technician • Licensed Non-Prescriber Pharmacist 	<p>Telephone with read back</p>	<p>Program prescriber</p>	
<p>Medication orders (renewal)</p>	<ul style="list-style-type: none"> • Registered Nurse • Clinic Pharmacy Technician • Licensed Non-prescriber Pharmacist 	<p>Per protocol co-sign required</p>	<p>Program prescriber</p>	<p>See Standardized Procedure for BHS Nurse-initiated medication renewal.</p>
<p>Point-of-Care tests</p>	<ul style="list-style-type: none"> • Registered Nurse • Licensed Vocational Nurse • Licensed Psychiatric Technician • Medical Assistant • Health Worker • Licensed Non-Prescriber Pharmacist • AOD Counselor 	<p>Per protocol co-sign required</p>	<p>Program prescriber</p>	
<p>Staff communication orders</p>	<ul style="list-style-type: none"> • Registered Nurse • Licensed Vocational Nurse • Licensed Psychiatric Technician • AOD Counselor 	<p>Per protocol co-sign required</p>	<p>Program prescriber</p>	

Appendix C: List of Orders for Outpatient Programs with OUT Prescribers, including Court Programs

A list of orders that can be placed by a non-prescriber, and the order mode that should be used for this process.

Order	Who can write, modify, and/or discontinue this order?	Order Mode	Orders Authorizing Provider	Additional Details
Ambulatory referral and E-consult orders	<ul style="list-style-type: none"> • Health Worker • Eligibility Worker • Clerk • Peer Support Specialist • Occupational Therapist 	Per protocol NO co-sign required	Designated placeholder prescriber or LPHA	
	<ul style="list-style-type: none"> • Clinical Trainee 	Per protocol NO co-sign required	Supervising LPHA	
	<ul style="list-style-type: none"> • LPHA • Waivered/Registered LPHA • Mental Health Worker • Mental Health Specialist • AOD Counselor 	Per protocol NO co-sign required	Ordering user	
Point-of-Care tests	<ul style="list-style-type: none"> • Registered Nurse • Licensed Vocational Nurse • Licensed Psychiatric Technician • Medical Assistant • Health Worker 	Per protocol co-sign required	Designated placeholder prescriber	

Appendix D: List of Orders for Residential Programs with Prescribers

A list of orders that can be placed by a non-prescriber, and the order mode that should be used for this process.

Order	Who can write, modify, and/or discontinue this order?	Order Mode	Orders Authorizing Provider	Details
Ambulatory referral and E-consult orders	<ul style="list-style-type: none"> • Peer Support Specialist 	Per protocol NO co-sign required	Program prescriber or LPHA	
	<ul style="list-style-type: none"> • Clinical Trainee 	Per protocol co-sign required	Supervising LPHA	
	<ul style="list-style-type: none"> • LPHA • Waivered/Registered LPHA • Mental Health Worker • Mental Health Specialist • AOD Counselor 	Per protocol NO co-sign required	Ordering user	
Inpatient Medications	<ul style="list-style-type: none"> • LPHA • Waivered/Registered LPHA • Mental Health Worker • Mental Health Specialist • AOD Counselor 	Telephone with read back	Program prescriber	Refer to each residential program’s policy on residential counselors receiving telephone orders from providers.
Release of Medications (Discharge Medications)	<ul style="list-style-type: none"> • LPHA • Waivered/Registered LPHA • Residential Counselor • AOD Counselor 	Telephone with read back	Program prescriber	
Staff communication orders	<ul style="list-style-type: none"> • LPHA • Waivered/Registered LPHA • Residential Counselor • AOD Counselor 	Per protocol co-sign required	Program prescriber	

Point-of-Care tests	<ul style="list-style-type: none">• LPHA• Waivered/Registered LPHA• Residential Counselor• AOD Counselor	Per protocol co-sign required	Program prescriber	
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