

Electronic Prescribing of Controlled Substances (EPCS): A Plan for Arizona



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HIT Strategy & Management Consultants



Meaningful Connections:
Patient Engagement, Interoperability & Collaborative Care

Proprietary and Confidential

Outline



- Current EPCS environment
 - EPCS is legal in the US and Arizona
 - Benefits to key stakeholders
- Understanding the Arizona Market
 - Prescribers
 - Pharmacies
 - Technology Vendors
- AzHeC Assistance in starting EPCS
- How to get started doing EPCS

Current EPCS Environment



EPCS is LEGAL in the US



DEA's Interim Final Rule for Electronic Prescriptions for Controlled Substances was published on March 31, 2010 at 75 FR 16236-16319 and became effective on June 1, 2010.



CHAPTER 184 HOUSE BILL 2369

CONTROLLED SUBSTANCES IN SCHEDULES II, III, IV AND V MAY BE DISPENSED AS ELECTRONICALLY TRANSMITTED PRESCRIPTIONS IF THE PRESCRIBING MEDICAL PRACTITIONER IS ALL OF THE FOLLOWING:

1. PROPERLY REGISTERED BY THE UNITED STATES DRUG ENFORCEMENT ADMINISTRATION.
2. LICENSED IN GOOD STANDING IN THE UNITED STATES JURISDICTION IN WHICH THE MEDICAL PRACTITIONER PRACTICES.
3. AUTHORIZED TO ISSUE SUCH PRESCRIPTIONS IN THE JURISDICTION IN WHICH THE MEDICAL PRACTITIONER IS LICENSED.



... and in Arizona



ARIZONA REVISED STATUTES

ARTICLE 4. PROFESSIONAL PRACTICES

R4-23-407. PRESCRIPTION REQUIREMENTS

Electronic transmission of a prescription order from a medical practitioner to a pharmacy

1. Unless otherwise prohibited by law, a medical practitioner or medical practitioner's agent may transmit a prescription order by electronic means, directly or through an intermediary, including an E-prescribing network, to the dispensing pharmacy as specified in A.R.S. § 32-1968.

**a medical practitioner
... may transmit a
prescription order ...
to the dispensing
pharmacy**

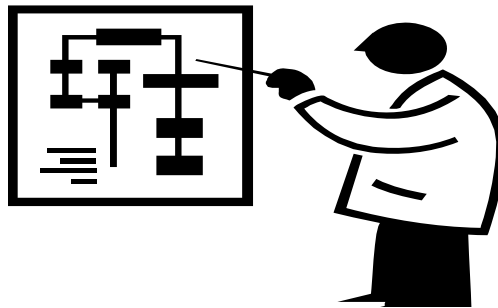
2. For electronic transmission of a Schedule II, III, IV, or V controlled substance prescription order, the medical practitioner and pharmacy shall ensure that the transmission complies with any security or other requirements of federal law.

**electronic transmission of a
Schedule II, III, IV or V
controlled substance
prescription order (must
comply) ... with federal law**

EPCS provides value to physicians & pharmacists



Creates one workflow for all electronic prescriptions



Reduces fraud and abuse



Condenses recordkeeping for patients' prescription history



Improves legibility and decreases adverse drug events



Understanding the Arizona market for EPCS & e-Prescribing



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Pharmacy Readiness



- Pharmacies must also be certified to accept EPCS Rx's
- Walgreens & CVS both now accept EPCS Rx's

#	Name	# of Stores
1	Walgreens Drug Store	250
2	CVS/pharmacy	136
3	FRYS PHARMACY	119
4	SAFEWAY	98
5	Wal-Mart Neighborhood Market/Pharmacy	97
6	TARGET PHARMACY	47
7	OSCO DRUG/PHARMACY	35
8	Bashas' United Drug	30
9	Costco Pharmacy	17
10	Sam's Club Pharmacy	15
11	KMART	12
		856

Defining the Market - EHRs



The following prescriber software vendors have products that have achieved Surescripts certification and completed their third-party audits for e-prescribing of controlled substances:

- RxNT
- NextGen
- Cerner Corporation
- Epic

- Allscripts ePrescribe
- DrFirst*
- NewCrop*

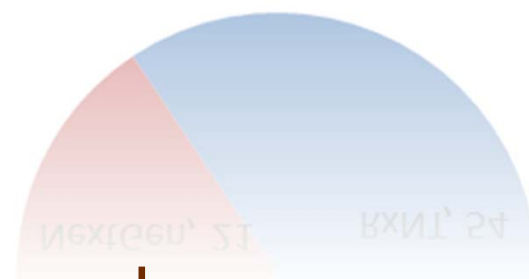
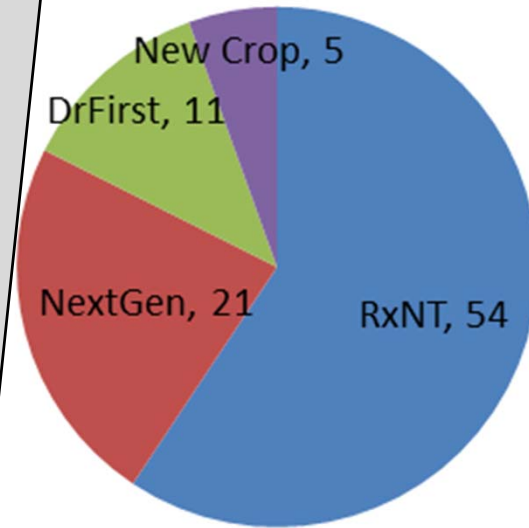


* Additional EHR solutions are able to transmit EPCS transactions over the Surescripts network through their use of DrFirst and NewCrop as the e-prescribing application

Current Statistics for EPCS Prescribers



	Number of Prescribers certified to EPCS	Number of EPCS Rx's sent
May	16	196
June	16	209
July	24	220
August	91	817
September		
October		
November		
December		



Arizona Prescribers have begun ePrescribing Controlled Substances!

EPCS Set-up Steps for Prescribers



1. Contact your EHR and ask if they are certified to do EPCS

- a) If yes, proceed to step 2
- b) If no, then you cannot do EPCS until they are certified

2. Complete Identity Proofing requirement

3. Set up Access Controls

4. Obtain Dual Authentication device or process

5. Adhere to digital signature and audit requirements

To find out more about certification for EPCS or which vendors are certified, you can also visit the Surescripts website:

<http://www.surescripts.com/about-e-prescribing/e-prescribing-of-controlled-substances>

EPCS Set-up Steps for Pharmacies



- 1. Contact your Pharmacy System vendor and ask if they are certified to do EPCS**
 - a) If yes, proceed to step 2
 - b) If no, then you cannot accept EPCS Rx's until they are certified
2. Set up Access Controls
3. Create an eRx Audit process
4. Adhere to record-keeping requirements

To find out more about Pharmacy Requirements for EPCS, visit the DEA website:
<http://www.deadiversion.usdoj.gov/pubs/manuals/pharm2/index.html>

EPCS Requirements for EHRs



All applications involved in the EPCS process must meet specific security requirements to prevent diversion, fraud, and abuse. The software they use meets the DEA's requirements set forth in the IFR.

This is done in one of two ways:

Third Party Audit: The first is for the application provider to undergo a third party audit to ensure software compliance with the IFR. This must be performed by an appropriately credentialed auditor:

- The third party audit may be conducted by a person qualified to perform a WebTrust, SysTrust, or SAS 70 audit.
- The audit may be conducted by a Certified Information System Auditor who performs compliance audits as regular ongoing business activity.

Certification: The second option is for the application to be certified by a DEA Approved Certifying Organization.

DEA-ACO's and their EPCS certification processes are reviewed and approved by the DEA. ACO certification of an application signifies that the application is compliant with the DEA ECPS Rule as expressed in the IFR.

Free AzHeC Sponsored Webinars for Prescribers



Learn How to ePrescribe Controlled Substances

Are You Ready?

The wait is over: EPCS is here! It's time to *fully* streamline your prescribing workflow. Save time, improve the patient experience and increase safety. Join us in making Arizona the leader in the nation for EPCS.

In this complimentary **30-minute** webinar AzHeC will explain the legality of EPCS, how to implement EPCS in your practice and demonstrate the EPCS workflow. There will also be a brief Q&A!

Register using one the link below or at
http://www.azhec.org/events/event_list.asp.

Oct 22 @ 7:00 a.m. PT

Register:

<https://cc.readytalk.com/r/dfjr9k531qmqz&eom>

Oct 23 @ 7:00 p.m. PT

Register:

<https://cc.readytalk.com/r/pd9d42y68st9&eom>

Free AzHeC Sponsored Webinars for Pharmacies



Learn How to ePrescribe Controlled Substances

Controlled Substances ePrescribing and Pharmacy's Bottom Line: Are You Ready?

The wait is over: EPCS is here! It's time for pharmacy to fully streamline the prescribing workflow and stay relevant in a competitive marketplace. EPCS will save time, improve the customer experience and increase safety. Join us in making Arizona the leader in the nation for EPCS.

In this complimentary 30-minute webinar we will help pharmacists understand the requirements for EPCS and the benefits of implementing this important technology. There will also be a brief Q&A!

Register using one the link below or at
http://www.azhec.org/events/event_list.asp.

Oct. 24 @ 7:00 p.m. PT

Register:

<https://cc.readytalk.com/r/corftjgq4wgc&eom>

Coming in November



In addition to the Webinars, there will be LIVE FORUMS throughout the state to answer your questions about EPCS

Arizona Health-e Connection



Contact AzHeC to discuss how they may assist you
in implementing EPCS

Ask about grants that may be available to help off-
set short-term costs

Arizona Health-e Connection

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