

Electronic Prescriptions for Controlled Substances (EPCS)

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Emdeon Corporation

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Emdeon Practice Services

- ePrescribing offered since 1995
- PC, PDA, Web applications
 - embedded in EMR or standalone
- 40 states
- Active participant & supporter – NCPDP



EPCS Questions

What is your perception of the current risks associated with electronic prescribing? How did you identify those risks? How does your electronic prescribing system address those risks?

- Safer than paper-based prescribing
- Computerized audit trail
- Data encryption

Are risks pertaining to prescriptions for controlled substances different from prescriptions for non-controlled substances?

- Audit trail

What additional modifications would be necessary for your system to be used for electronic prescribing of controlled substances?

- OPPORTUNITY COST is biggest issue





EPCS Questions

How does your system authenticate the person signing the prescription?

- UETA/eSign

"Electronic signature" means an electronic sound, symbol, or process attached to or logically associated with a record and executed or adopted by a person with the intent to sign the record.

How does your system ensure the integrity of the prescription records?

- 128-bit encryption
 - Cyclical Redundancy Check (CRC)
- *If a prescription transaction is received at the network that was issued by an unauthorized user, missing any of the electronic signature indicia, or destined to a pharmacy not enrolled on the network, that transaction is considered "unsigned" and is therefore rejected at the network level and returned to the submitter.*





Emdeon Comments

Implementing a PKI electronic signature standard is unnecessary.

- Current technology exceeds manual process
 - Prescriber enrollment requirements based on independent verification
 - Trusted partners ensure that only authorized prescribers have network access
 - Authentication protocols to access e-prescribing applications
 - Prescription transmission across secure circuits using 128-bit encryption
 - Robust audit capabilities
- PKI locks down the message content from source to destination,
 - offers no improvement over current methods in validating that the logged-on user is who he or she claims to be.



Emdeon Comments

Implementing a PKI electronic signature standard is unnecessary.

- Costly
- No state requires PKI
- Existing applications don't support PKI
- Standards don't support PKI
- Workflow considerations
- Slow the adoption of ePrescribing
- PKI requirement would renders VAN's unusable



Recommendations

- Recognize technologies that
 - Comply with E-Sign Act
 - Utilize industry best practice standards for prescriber credentialing
 - Utilize currently deployed authentication processes
 - Enable electronic transmission directly or via EDI networks, compliant with HIPAA requirements
 - Identify a minimum set of indicia to assist pharmacists in identifying valid electronic signature
 - Preserve the Pharmacist's right (and obligation) to validate authenticity



In Sum....

Emdeon believes that the electronic signature standard adopted by DEA should facilitate the health care community's transition from traditional handwritten prescriptions to electronically transmitted prescriptions.

To sustain the momentum of this transition, it is critical that DEA avoid adopting a technology-specific standard that would make e-prescribing more burdensome than DEA's legacy (manual) processes and require the industry to embark on a costly, time-consuming and unnecessary re-engineering effort.



Thank you for the opportunity to participate.....

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