SECURITY OF ELECTRONIC PRESCRIPTIONS

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Duties of the Ohio Pharmacy Board

- Licensing/Administrative Agency
- Law Enforcement Agency

Enforcement Responsibility – ORC
2925. – Criminal Drug Laws
3715. – Food & Drug Laws
3719. – Controlled Substance Laws
4729. – Pharmacy/RX Drug Laws
WHY DO DEA & THE BOARDS EXIST?
Protection of the public through the enforcement of laws against those members of a profession/society who act in an illegal, immoral, incompetent, or impaired way.
WHY DO DEA & THE BOARDS EXIST?

Most HC professionals are honest and truly care about their patients. Some, however, are not and do not.

It is the last group for which the Boards (and DEA) were formed.
WHY DO DEA & THE BOARDS EXIST?

The goal is to be able to deal effectively with the dishonest people while minimizing the effect on the practices of the honest ones.
Ohio State Board of Pharmacy

**OSBP PRINCIPLES RE COMPUTER SECURITY**

Since 1991, the Ohio Board of Pharmacy has operated under the following principles for computer security:
The current paper and telephone system has MAJOR flaws. Electronic systems can and must do better.
RX SECURITY COMMENTS

PASSWORDS ARE WORTHLESS

AS A MEANS OF COMPUTER SECURITY IN A HEALTHCARE SETTING.
RX SECURITY COMMENTS

PASSWORDS ONLY

PROTECT HONEST PEOPLE FROM OTHER HONEST PEOPLE.
RX SECURITY COMMENTS

FOR MANY HEALTHCARE PROFESSIONALS, THE METHOD OF CHOICE FOR ENTERING A PASSWORD IS BEST DEFINED BY THE PHRASE:
SEEK AND YE SHALL FIND
RX SECURITY COMMENTS

H.C. PROFESSIONALS CANNOT CALCULATE THE HEXADECIMAL EQUIVALENT OF OUR DOG’S BIRTHDAY RAISED TO THE 27TH POWER AND THEN DIVIDED BY THE JULIAN DATE LIKE MOST COMPUTER PEOPLE!
RX SECURITY COMMENTS

W284K-Rqh66-QGRj4-8yQX3-9Wk8T

IS NOT SOMETHING WE COULD MAKE UP OR REMEMBER!
RX SECURITY COMMENTS

Then, 6 weeks later and after we FINALLY have it memorized, the security conscious computer whizzes tell us that one is no longer valid and we need to use:

QP632-176tU-8739B-h257G-5uU2X
RX SECURITY COMMENTS

When we think of passwords, we think of our pet’s name or something else simple:

FIFI, or BEARS, or KIM
Anyone within 5 feet of us can pick up our password. Therefore, there is no proof beyond a reasonable doubt about who actually performed the action.
It’s not even reliable, probative, and substantive (burden of proof for administrative hearings – at least in Ohio).
Ohio Administrative Code
Rule 4729-5-01(N)

"Positive identification" means a method of identifying an individual who prescribes, administers, or dispenses a dangerous drug.
Ohio Administrative Code
Rule 4729-5-01(N)

(1) A method may not rely solely on the use of a private personal identifier such as a password, but must also include a secure means of identification such as the following:

Ohio State Board of Pharmacy
Ohio Administrative Code
Rule 4729-5-01(N)

(a) A manual signature on a hard copy record;
(b) A magnetic card reader;
(c) A bar code reader;
(d) A thumbprint reader or other biometric method;
(e) A proximity badge reader;
(f) A board approved system of randomly generated personal questions;
Ohio Administrative Code
Rule 4729-5-01(N)

(g) A printout of every transaction that is verified and manually signed within a reasonable period of time by the individual who prescribed, administered, or dispensed the dangerous drug.

(h) Other effective methods for identifying individuals that have been approved by the board.
Ohio Administrative Code
Rule 4729-5-01(N)

(2) A method relying on a magnetic card reader, a bar code reader, a proximity badge reader, or randomly generated questions for identification must also include a private personal identifier, such as a password, for entry into a secure mechanical or electronic system.
With a password only system, you CANNOT tell me who is sitting at the Doctor’s terminal. You can only guess.
FINAL COMMENT TO DEA & HHS

Security of RX MUST begin at order entry by the prescriber or you are wasting time and money on the rest of the system.