

# Electronic Prescribing of Controlled Substances

(EPCS)

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## **Contents**

Introduction	3
ChartMaker Medical Suite & IdenTrust Enrollment	∠
Additional Enrollments	13
Setup	15
Hardware Setup	15
SafeNet Driver	15
RDP Settings	18
Token Certificate	19
ChartMaker® Clinical Configurations	
Office Hours	
Logical Access	
Prescriber Setup	
EPCS Token Linkage	
EPCS Prescriber Authorization	
Prescription Layout	
E-Prescribing in Clinical	
Auditing and Reporting	
EPCS Audit Trail	
Controlled Substance Drug Log	25
Daily Incident Report	
Monthly Drug Log	
Configuring Distribution Lists	
Incident Reporting	
Best Practices	
Glossary of Terms	
Appendix	
Bureau of Narcotic Enforcement: EPCS Registration for Physician Assistants	
Index	
Resources / Notes	
Document Change Log	36

# Introduction

Prior to being able to electronically send controlled substance prescriptions to a pharmacy, several steps must occur. The following information will get you on your way to becoming an EPCS-enabled provider.

The following is a checklist of items that must be completed in order to e-prescribe controlled substances through ChartMaker® Clinical:



Enrollment, Identity Proofing and Token Purchase through sticomputer.com



Upgrade your system to ChartMaker® Medical Suite to product version ChartMaker 2015 (File version 5.5.0.3.6.2 or higher)



(NY Only) Report your EPCS software to the BNE



Install the SafeNet driver (using the CD received from IdenTrust) on any device you will be e-prescribing from (including the server if users are remoting in to connect to ChartMaker® Clinical)



Download the certificate to the IdenTrust Token (via the internet)

Instructions on how to complete this are included in the instructions sent with the IdenTrust Token as well as in this manual



Configure EPCS within ChartMaker® Clinical

Logical Access Users
Prescriber Setup
Token Linkage
EPCS Prescriber Authorization

#### CHARTMAKER MEDICAL SUITE & IDENTRUST ENROLLMENT

Every provider who would like to electronically prescribe controlled substances will need to enroll for this functionality with STI Computer Services, nc. as well as purchase an IdenTrust Token in order for Two-Factor Authentication to be performed.

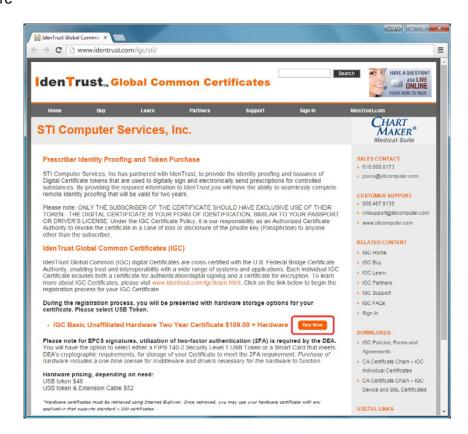
A Token must be purchased <u>per provider</u> intending to e-prescribe controlled substances. Additionally, the information entered when purchasing the Token must be the Token Holders (i.e. the provider).

#### To enroll for EPCS using ChartMaker® Clinical:

- 1. Open a web browser and go to www.sticomputer.com
- 2. Click the "Enrollments" link from the top
- 3. Click "Electronic Prescribing of Controlled Substances (EPCS)"
- 4. Fill out the applicable information and click "Submit"

**NOTE**: This enrollment form will notify STI of your intent to enroll in the EPCS program. You must continue below to purchase the appropriate token and certificate from IndenTrust. You will not be able to complete configuration within ChartMaker® Medical Suite until your token and certificate are received and installed. The IdenTrust certificate must be installed on any device that your provider intends to electronically prescribe controlled substances from.

- 5. Click "IdenTrust Click Here" (Click Here
- Click "Buy Now" next to IGC Basic Unaffiliated Hardware Two Year Certificate \$109.00 + Hardware



#### 7. Click "I'm Ready - Let's Start My Application"



#### IdenTrust Global Common Certificates

Application Step 1 of 7 » Overview » Storage » You » Password » Agreement » Payment » Done

# Getting Your IGC Basic Assurance Unaffiliated Certificate is as EASY as 1 - 2 - 3

#### 1 - Apply

Complete the Online Application - Start below.

#### 2 - Get Verified

This phase, carried out by IdenTrust Services, LLC (IdenTrust), consists of validating the information you provide against independent data sources. You need to do nothing during this stage; you will receive a retrieval kit in the mail from IdenTrust if your application is approved.

#### 3 - Get Your Certificate

This phase consists of generating your keys for use. This phase begins once you have received your retrieval kit.

#### Before you begin your application, have the following ready:

- · Credit Card information for address verification only (not used for payment)
- · Payment method information: Credit Card, Order Number or Voucher Number
- · Valid Email Address

X Cancel

I'm Ready — Let's Start My Application >

#### 8. Click "Next"



#### IdenTrust Global Common Certificates

Application Step 2 of 7 » Overview » Storage » You » Password » Agreement » Payment » Done

#### Compatibility Check

Your web browser and operating system combination may not be compatible for retrieving and using the digital certificate you have selected.

At the end of the application, more information will be given concerning which browsers are compatible for your digital certificate.

X Cancel < Back

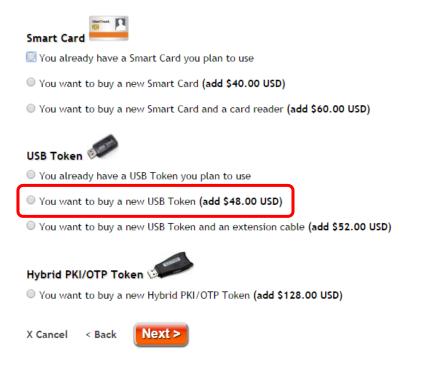
Next >

Select the radio button for "You want to buy a new USB Token (add \$48.00 USD)" and click "Next"

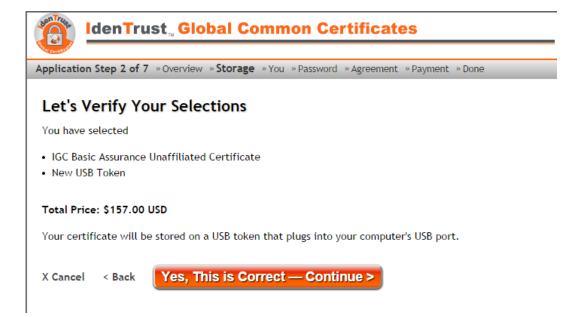


#### Which Device Would You Like to Use?

Select a mechanism for storing your IGC Basic Assurance Unaffiliated Certificate from the options below. A hardware device, such as a smart card or USB token, offers the highest level of protection for your digital certificate. You will receive your hardware after your application has been approved.



10. Click "Yes, This is Correct - Continue"

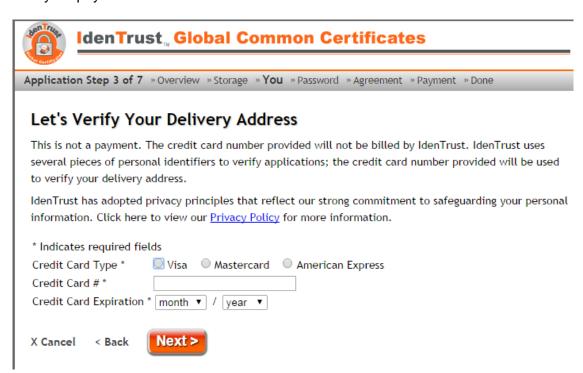


#### 11. Fill out your information and click "Next"



#### 12. Fill out your information and click "Next"

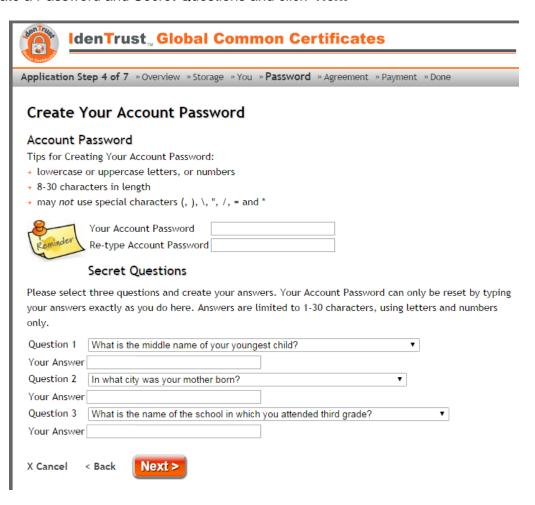




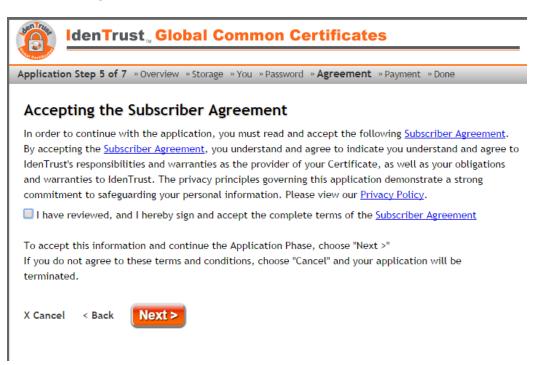
- 14. Confirm your information and click "Yes and Continue"
- 15. Read the disclaimer and click "I Don't Want That I'll Remember My Passwords"



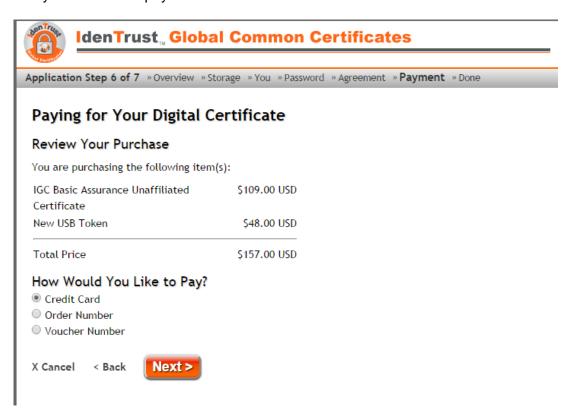
Create a Password and Secret Questions and click "Next"



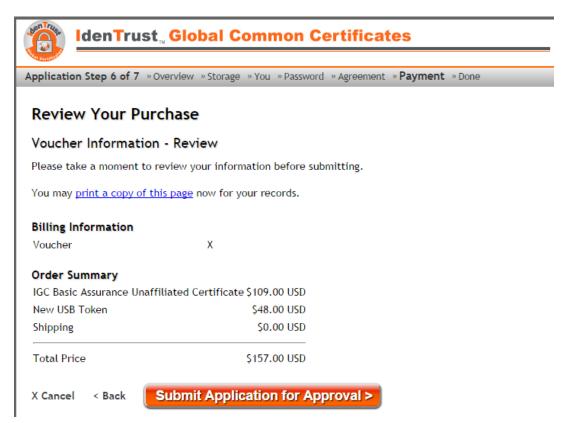
17. Check the box for "I have reviewed, and I hereby sign and accept the complete terms of the Subscriber Agreement" and click "Next"



18. Select your method of payment and click "Next"



- 19. Enter your payment details and click "Next"
- 20. Review your information and click "Submit Application for Approval"





#### IdenTrust Global Common Certificates

Application Step » Overview » Storage » You » Password » Agreement » Payment » Done

#### Congratulations!

Thank you for applying for your IGC Basic Assurance Unaffiliated Certificate. You have completed the application phase. IdenTrust will now initiate the approval of your application.

**Remember**, there are **3 Phases** in the process of obtaining your IGC Basic Assurance Unaffiliated Certificate. You have just completed the first of these, the Application Process.

IdenTrust will now complete the second phase of your application, Approval. If successful, you will need to complete the final phase, Retrieval, to obtain your certificate.

#### How Do I Verify My Email Address?

Step 1. Go to your email to check for your Verification Code sent from trustsource@identrust.com Step 2. Follow the directions in the email to verify your email address.

If you have not received your Verification Code from trustsource@identrust.com after a brief period, you may

- · Check your bulk email folder for this email
- Verify that your spam filters allow you to receive emails from trustsource@identrust.com; this may
  require the assistance of your system administrator
- Request your Verification Code be emailed again by going to https://secure.identrust.com/app/resendEmailVerification?id=420700584

Email Verification must be completed (within 30 days) for IdenTrust to approve your account.



#### 22. Click "Close"



#### IdenTrust, Global Common Certificates

Application Step 7 of 7 " Overview " Storage " You " Password " Agreement " Payment " Done

#### Please Understand for Getting Your Digital Certificate

As previously noted, your current browser is not compatible for retrieving your digital certificate.

For retrieval, you will need to use a compatible browser.

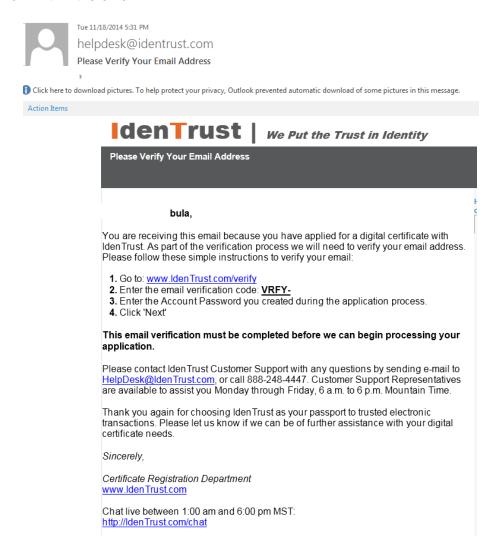
Compatible browsers are Internet Explorer or Firefox.



#### **Completing Verification:**

You most likely will receive several emails from IdenTrust after completing the enrollment process: a payment confirmation, a registration approval and a request to verify your email address.

1. Click on the link from within the email



2. Enter the Verification Code and Password and click "Next"

#### ADDITIONAL ENROLLMENTS

Check with your state regulations to see if your practitioner needs to enroll or notify any other entity of your intent to electronically prescribe controlled substances.

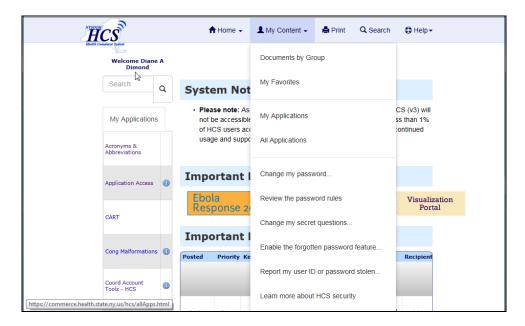
For example, in the state of New York, practitioners must have an HCS account (also used to log into I-STOP), must query the Prescription Monitoring Program (PMP) Registry when writing prescriptions for Schedule II, III, and IV controlled substances and must notify the Bureau of Narcotic Enforcement (BNE) of the EMR software you are utilizing.

#### To notify the BNE of your software vendor (all providers except PAs):

- 1. Open a web browser and go to https://commerce.health.state.ny.us
- 2. Enter your User ID and Password and click "Sign In"



3. Click "My Content" and then select "All Applications"



4. In the "Browse by" menu, click the "R" to narrow down your results

5. Click "Registration for Official Prescription and e-Prescribing Systems (ROPES)"



6. Type in the **Software Provider** (STI Computer Services, Inc.), **Name of Software Application** (ChartMaker® Medical Suite) and **Software Version** (ChartMaker 2015), and save the information



**NOTE**: After the selections have been designated one time, they should be available for other providers. You will receive a confirmation dialog similar to this:



#### To notify the BNE of your software vendor (for PAs):

- 1. Print the applicable form (found in the Appendix on page 31)
- 2. Enter the following information where necessary:

**Vendor Name**: STI Computer Services, Inc. **Product Name**: ChartMaker® Medical Suite

**Product Version**: ChartMaker 2015

3. Submit the form to the BNE

#### HARDWARE SETUP

The following steps will need to be taken by someone in your practice in order to prepare your computer(s) and/or Tokens to be used to electronically prescribe controlled substances. Once you receive the IdenTrust Token and instructions (including CD) in the mail, you may proceed with the following steps.

#### SafeNet Driver

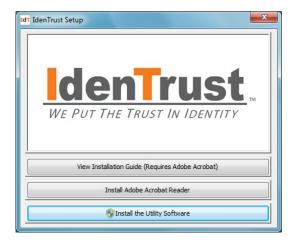
The SafeNet Driver must be installed on every device that your provider intends to e-prescribe controlled substances from. If you do not have the CD that came with your IdenTrust Token, please call Clinical Support.

#### To install the SafeNet Driver:

- 1. Insert the IdenTrust (EPCS SafeNet Authentication Client) CD into your computer
- 2. When prompted with an AutoPlay dialog, select "Run setup.exe"



3. Select "Install the Utility Software"



4. Select "Yes" to restart your computer when prompted

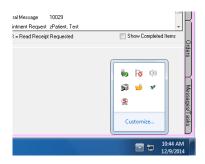
**ALTERNATE METHOD**: You may select "No" and do it at a later time but do not attempt to proceed with additional EPCS setup until your computer has been rebooted.

5. Repeat steps 1 – 4 on any computer the provider intends to e-prescribe controlled substances from

**NOTE**: This process must also be completed on your server if anyone accessing ChartMaker® Medical Suite remotely.

### To modify the automatic logoff setting (REQUIRED):

1. Click the arrow in your system tray



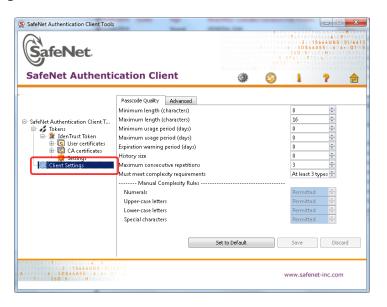
2. Right-click on the SafeNet icon ( ) and select "Tools"



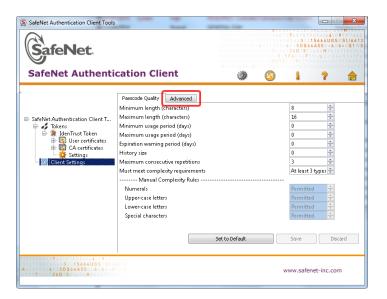
3. Click the "Advanced View" icon (



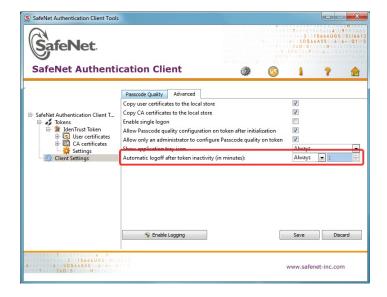
4. Click "Client Settings" from the left



5. Click the "Advanced" tab



6. Change "Automatic logoff after token inactivity (in minutes)" to "Always"



- 7. Click "Save"
- 8. Click the red x ( ) to close the SafeNet Authentication Client Tools dialog

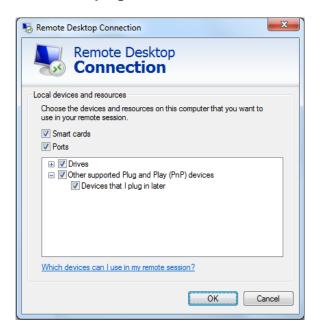
**NOTE**: This must be configured for each user that logs onto this computer.

## **RDP Settings**

If you are remoting to the server to access ChartMaker® Clinical, you must allow the RDP session to view your local drives and devices so that it recognizes the IdenTrust Token.

#### To configure the RDP to recognize the Token:

- 1. Open the RDP (i.e. Start > All Programs > Accessories > Remote Desktop Connection)
- 2. Click the down arrow next to "Options" ( Options )
- 3. Click the "Local Resources" tab
- 4. Click "More"
- 5. Check the box for "Smart cards", "Ports", "Drives" and "Other supported Plug and Play (PnP) devices"
- 6. Click the **plus sign** (<sup>1</sup> ) next to "Other supported Plug and Play (PnP) devices"
- 7. Check the box for "Devices that I plug in later"



- 8. Click "OK"
- 9. Click the "General" tab and then save your RDP connection by either clicking "Save" or "Save As..."

#### **Token Certificate**

Prior to using the IdenTrust Token, you must download the certificate to the Token <u>within 90</u> <u>days from the date of approval</u>. If your certificate is not retrieved within this timeframe, your account will be automatically closed and you will be required to apply for a new certificate.

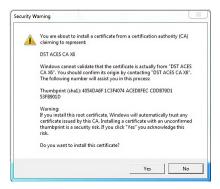
#### To download the certificate to the IdenTrust Token:

1. Insert the IdenTrust **Token** into a USB port in your computer

**NOTE**: If this is a new, unused USB Token or Token where certificates have not already been installed, you will be prompted to change the Token password. Once prompted, click "OK" and proceed with changing your password. The "Current Token Passcode" can be found on the paper instructions sent with the Token.

Make sure you document the password in a secure place. If you forget the password, your certificate will be permanently locked and you will need to purchase a new Token.

2. Click "Yes" when prompted with the Security Warning



- 3. Open an Internet Explorer browser and go to http://identrust.com/install
- 4. Enter your "Secure Activation Code" (located on the paper instructions sent with the Token)
- 5. Enter the "Account Password" you created when you first applied online

**NOTE**: This is <u>not</u> the Token password you set up in Step 1.

6. Follow the prompts to retrieve your IGC Certificate

**NOTE**: Do not close your browser or click the "Back" button at any time during the retrieval process or it may cause the system to void your retrieval.

#### To test your certificate (optional):

- 1. Open a web browser and go to <a href="https://secure.identrust.com/tsapp/retrieve-verify-instr.jsp">https://secure.identrust.com/tsapp/retrieve-verify-instr.jsp</a>
- 2. Follow the prompts to complete the process

#### CHARTMAKER® CLINICAL CONFIGURATIONS

The following steps will need to be taken by someone in your practice in order to configure ChartMaker® Clinical for e-prescribing controlled substances.

#### Office Hours

This configuration will allow you to set your practice's office hours. Any person who logs in and performs EPCS after the designated office hours will be logged to the daily incident report for the provider's review. **NOTE**: This feature is available as of ChartMaker® Medical Suite 2015 (fv 5.7).

#### To designate Office hours:

- 1. In Clinical, go to Edit > System Tables > Office Hours
- 2. Click the dropdown for each day of the week to configure the **Start** and **End** of your office hours

**NOTE**: If your office is closed, click the checkbox for "Closed" for the corresponding day.

3. Click "OK"

## **Logical Access**

The Logical Access privilege allows the selected user the ability to administer EPCS capabilities to qualified practitioners. (It does *not* give the ability to physically e-prescribe controlled substances) At least 2 users will need to be assigned this privilege with one of them being an EPCS-enabled provider with a linked token.

#### To designate users for Logical Access:

- 1. In Clinical, go to Edit > System Tables > Users
- 2. Highlight the user
- 3. Click "Properties"
- 4. In the Privilege option box, select "Logical Access"
- 5. Select the "Authorized" radio button for Level
- 6. Click "OK"
- 7. Repeat steps 2 6 for any additional users
- 8. Click "Close"

#### **Prescriber Setup**

Prescriber Setup is applicable to all e-prescribing functionality whether it is a controlled substance or not. All providers and practice locations must be set up through this dialog prior to e-prescribing any medication.

#### **To configure Prescriber Setup:**

- 1. In Clinical, go to Edit > System Tables > Electronic Prescribing > Prescriber Setup
- 2. Highlight the Provider and Location

NOTE: If there are no Locations for the selected Provider, click "Add" and skip to Step 4.

- 3. Click "Edit"
- 4. Fill in the applicable information, including SPI and DEA number, if not already present
- 5. Click the checkbox for "EPCS Enabled"
- Click "OK"
- 7. Repeat steps 2 6 for any additional providers
- 8. Click "OK" to close the Prescriber Setup dialog

## **EPCS Token Linkage**

Linking the IdenTrust Token to the applicable provider within ChartMaker® Clinical must be completed one-time per provider (i.e. token holder). Token Linkage is *not* required to be done on every computer the provider intends to e-prescribe from. The Token Linkage option will only be available to users that are configured with the EPCS SureScripts service level rights on the Health Portal and have "EPCS Enabled" selected in Prescriber Setup.

#### To link a Token:

- Log into Clinical as the provider and go to Edit > System Tables > Electronic Prescribing > EPCS Token Linkage
- 2. Insert the token into a USB port on your computer
- 3. Click "Load"
- 4. Select the **certificate** and click "**OK**"
- 5. Click "Link"
- 6. Click "OK" on the confirmation dialog

#### **EPCS Prescriber Authorization**

The EPCS Prescriber Authorization will grant the ability for an individual provider to electronically prescribe controlled substances. The user logged in when attempting to complete this step must to have their "Logical Access" privilege set to "Authorized" in order for the EPCS Prescriber Authorization menu option to be available.

#### To send the Authorization Request:

- 1. In Clinical (logged in as someone other than the Prescriber you are attempting to authorize), go to Edit > System Tables > Electronic Prescribing > EPCS Prescriber Authorization
- 2. Select the applicable Prescriber
- 3. Select the user from the "**Logical Access User**" dropdown that you want to receive the authorization request
- 4. Click "Authorize"
- 5. Click "Yes"
- 6. Click "Close"

**NOTE**: A To Do List notification will then be sent to the user you selected in Step 3.

#### To approve the Authorization Request:

- 1. In Clinical (logged in as the EPCS Prescriber), **double-click** on the red To Do List notification titled, "**EPCS Authorization Approval Requested**"
- 2. Insert the IndenTrust **Token** into your computer
- 3. Click "Approve"
- 4. Type your IdenTrust Token password
- 5. Click "**OK**"
- 6. Click "OK" on the confirmation dialog

## **Prescription Layout**

If you are attempting to print scripts for controlled substances that have been electronically prescribed, certain fields are now required to be on the script. The following will instruct you on how to update your prescription layout template.

**NOTE**: If you are using a custom prescription layout, please contact Clinical Support for assistance in manually updating your prescription layout.

#### To update the prescription layout:

- 1. In Clinical, go to Edit > Preferences...
- 2. Click the "Prescription" tab
- 3. In the **Rx Format** field, click the ellipses icon ( ) to select a different format
- 4. Select the applicable .cml file for your state and click "Open"

NOTE: The applicable files include CMDefaultSmallEPCS.cml, De1EPCS.cml, NjStandardEPCS.cml, NyBlankEPCS.cml, NyStandardEPCS.cml, and Va1EPCS.cml. They are located in the \\\stisuite\rootdir\\000\\config\\cml\) folder on your server.

- 5. Click "Set"
- 6. Click "OK"
- 7. Repeat steps 1 6 for any additional users as this is a **per user** configuration

# **E-Prescribing in Clinical**

E-prescribing a controlled substance is not much different than prescribing a non-controlled substance. There are only several fields that differ or may be required.

#### To e-prescribe a controlled substance:

1. In an office visit note, click the "Medication" button (Medication)

**Alternative Method**: Use the options available (to add or renew) when you right-click on the medication from the Face Sheet.

- 2. Choose "Add Medication" (or "Renew Medication")
- 3. Search for and select the controlled substance medication
- 4. Enter all appropriate fields and click "Next"

**NOTE**: Select "E-Prescribe" in the Transmission field. If the medication is a Schedule II controlled substance, a date must be entered in the Earliest Fill Date field and may only be issued with a Refill value of 0.

5. Select the **Location** (if necessary) and the patient's **Pharmacy** 

**NOTE**: If prescribing a controlled substance, you must select a pharmacy that has the "EPCS" designation next to their name and have your IdenTrust token (see below) inserted into your computer.



#### Sample IdenTrust Token:

- 6. Click "Ready to sign"
- 7. Click "Sign and Send"
- 8. Enter your Token Passcode and click "OK"



# **Auditing and Reporting**

#### **EPCS Audit Trail**

The Audit Trail will display any action related to the EPCS functionality taken by a user in ChartMaker® Clinical.

#### To view Audit Trail information:

- 1. In Clinical, go to Chart > Audit > EPCS Audit Trail and Drug Log...
- 2. Modify the "From" and "To" fields in Date Range, if applicable
- 3. (Optional) Uncheck any unnecessary **Actions** or **Outcomes** in the "Custom Report" section to modify the results to be displayed
- (Optional) Select the **Metadata** dropdown and enter a Search Value to search for specific criteria, such as specific patient or medication
- 5. (Optional) Uncheck "**Show only incidents**" if you would like to see all records and not just ones designated as "incidents"
- 6. Click "Refresh Report"

**NOTE**: If the Audit Trail was opened inside of a patient's chart, the information displayed will be patient-specific.

#### To save a copy of the Audit Trail:

- 1. Generate the report by completing steps 1-6 detailed in "To view Audit Trail information"
- 2. Click "Save As Text" to save as a .txt file or "Save as HTML" to save as a .html file
- 3. Designate a File name
- 4. Click "Save"

## **Controlled Substance Drug Log**

The Controlled Substance Drug Log will display individual prescription information for any controlled substances electronically prescribed by a user in ChartMaker® Clinical.

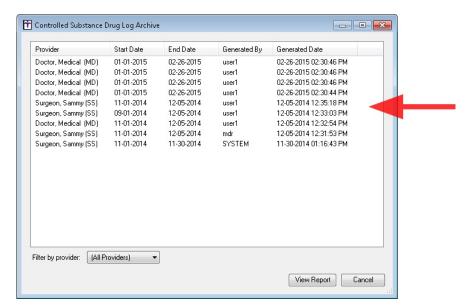
#### To generate a new Controlled Substance Drug Log:

- 1. In Clinical, go to Chart > Audit > EPCS Audit Trail and Drug Log...
- 2. Click the "Controlled Substance Drug Log" tab
- 3. On the "New Report" tab, select the appropriate Provider
- 4. Select the **Start** and **End Date** to set the time range for this report
- 5. Click "Generate Report"

**NOTE**: Every time you click "Generate Report", the system is creating a new Drug Log that can then be accessed through the Report Archive sub-tab.

#### To view a previously generated report:

- 1. In the Controlled Substance Drug Log tab, click the "Report Archive" sub-tab at the bottom
- 2. Click "Previous Reports..."
- 3. Select the applicable Drug Log



4. Click "View Report"

**NOTE**: If the Drug Log displays "SYSTEM" in the Generated By column, this indicates that it was an automated Monthly Drug Log and not manually created.

#### To save a copy of a New Report or an Archived Report:

- 1. Generate the report by completing steps detailed in "To generate a new Controlled Substance Drug Log" or "To view a previously generated report"
- 2. Click "Export..."
- 3. Select a **Location** and Designate a **File name**
- 4. Click "Save"

**NOTE**: The report will be saved as a .CSV file format.

## **Daily Incident Report**

The Controlled Substance Daily Incident Report will appear on the To Do List for any user that has the Logical Access user privilege set to "Authorized". It will contain a summary of any actions related to the EPCS functionality taken by a user in ChartMaker® Clinical for that day.

The DEA requires all providers to view this log and report any suspicious activity to STI Computer Services and the DEA within 1 business day of receiving it.

#### To view a Controlled Substance Daily Incident Report:

- 1. In Clinical, double-click on the To Do List reminder labeled, "REQUIRED: Controlled Substance Daily Incident Report Reminder"
- 2. Review the information
- 3. Click "Close" to close the audit dialog

## **Monthly Drug Log**

The Controlled Substance Monthly Drug Log will appear on the To Do List for any EPCS-authorized provider who has electronically prescribed controlled substances. It will contain a summary of all controlled substance prescriptions electronically prescribed by a user in ChartMaker® Clinical for the previous month.

The DEA requires all providers to view this log and report any suspicious activity to STI Computer Services and the DEA within 7 calendar days of receiving it.

#### To view a Controlled Substance Monthly Drug Log:

 In Clinical, double-click on the To Do List reminder labeled, "REQUIRED: Controlled Substance Monthly Drug Log Reminder"

**NOTE**: If the user logged in is not the provider associated with the report, you will be prompted to select which Drug Log you would like to view first. Highlight the report and click "**View Report**".

- 2. Review the information
- 3. Click "Close" to close the audit dialog

## **Configuring Distribution Lists**

To manually add (or remove) a user to receive the Daily Incident Report or Monthly Drug Log:

- 1. Go to To-Do > New Message/Task...
- 2. Click "To..."
- 3. Highlight Controlled Substance Daily Report Notification or Controlled Substance Monthly Drug Log Notification
- 4. Click "Edit..."
- 5. Select the applicable user(s)
- 6. Click "Save"
- 7. Click "Cancel" twice

# **Incident Reporting**

If suspicious activity is identified through the Audit Trail, the daily report or the monthly drug log, it must be reported to the DEA. If suspicious activity is identified on the **daily report**, it must be reported within **1 business day**. If suspicious activity is identified on the **monthly drug log**, it must be reported within **7 calendar days** of the start of the month.

#### To report suspicious activity to STI Computer Services:

1. Save a copy of the log containing suspicious activity

**TIP**: See instructions on how to "Save a copy of the Audit Trail" on page 25 or how to "Save a copy of a New Report or an Archived Report" on page 26.

- 2. Open a web browser and go to <a href="https://www.sticomputer.com">www.sticomputer.com</a>
- 3. Click "News" and then "EPCS"
- 4. Click the link for "Submit an incident report"
- 5. **Download** the Incident Report Form and follow the steps to submit the form and a copy of your log to STI Computer Services, Inc.

# > Submitting Incident Reports

If you have noticed suspicious activity related to EPCS in the ChartMaker® Clinical audit trail or automated logs, the EPCS prescriber must report the event to their vendor as well as the DEA within 1 business day.

Per federal regulations, the Daily Incident Report should be reviewed within 1 business day of receiving it and the Monthly Drug Log should be reviewed within 7 calendar days. To submit an Incident Report to STI, please download our Incident Report

#### To report suspicious activity to the DEA:

1. Save a copy of the log containing suspicious activity

**TIP**: See instructions on how to "Save a copy of the Audit Trail" on page 25 or how to "Save a copy of a New Report or an Archived Report" on page 26.

2. Call the DEA and proceed with the instruction they provide

# **Best Practices**

In addition to the information presented below, providers should also review the Drug Enforcement Administration Code of Federal Regulations (<a href="http://tinyurl.com/ov2bajl">http://tinyurl.com/ov2bajl</a>), specifically sections 1306 and 1311, which cover in more detail the practitioner's responsibilities for prescribing controlled substances using an electronic prescription application. Section <a href="https://doi.org/10.100/journal.com/ov2bajl">1311.102</a> specifically addresses responsibilities of the Practitioner.

- 1. Provider must register for their token and certificate from IdenTrust in his/her own name.
- 2. After installing the SafeNet driver that comes with your token from IdenTrust, you must change the token "Automatic logoff after token inactivity (in minutes)" setting to "Always" so that you are prompted to enter your token password for each controlled substance medication that is prescribed (see instructions on page 16).
- 3. Provider is only allowed to link a single token to his/her user in Clinical.
- 4. Provider should always be in sole possession of their token. This token and passcode should not be given to any other person.
- 5. Provider should not allow any other user to log into Clinical with his/her credentials and electronically prescribe controlled substances using his/her token.
- 6. Provider should not login as a different provider and use their token to prescribe controlled substances.
- 7. Provider should report stolen or misplaced tokens to IdenTrust immediately.
- 8. Only a Practice user with Clinical administrative rights should assign the Logical Access privilege to users for EPCS administration.
- 9. The Practice user that is requesting authorization for a prescriber to perform EPCS must verify that the prescriber is in good standing with the DEA prior to sending the request to a provider for approval.
- 10. Provider is required to review the daily incident report for each day and report any suspicious or unauthorized activity to the DEA and EHR vendor within one business day. The incident report contains many actions, some of which might be valid, but it is up to the person reviewing the report to decide if it is an authorized action or not. Provider will receive a To-Do list message each day which serves as a shortcut to viewing this report.
- 11. A Practice user must enter the general office hours in the screen that can be accessed through Edit > System Tables > Office Hours. Any person who logs in and performs EPCS after the designated office hours will be logged to the daily incident report for the provider's review.
- 12. Provider is required to review the monthly drug log report at the end of each month and report any unauthorized prescriptions to the DEA and EHR vendor within seven business days. Provider will receive a To-Do list message on the 1<sup>st</sup> of each month which serves as a shortcut to viewing this report for the previous month.
- 13. When prescribing a medication for detoxification treatment (ex. Subutex, Suboxone, Zubsolv) a NADEAN# will be required to be entered accurately in the Notes to Pharmacist field on the Prescribe Medication screen.
- 14. When prescribing GHB (ex. Xyrem) a medical reason will be required to be entered accurately in the Notes to Pharmacist field on the Prescribe Medication screen.
- 15. Provider should not exceed a 90 day supply on any Schedule II controlled substance medication.
- 16. Provider must ensure that the Earliest Fill Date for consecutive controlled substance prescriptions are accurate.
- 17. Providers need to stay current with their state and local regulations regarding the prescribing of controlled substances.

# **Glossary of Terms**

Term	Definition
Controlled Substance	An addictive or behavior-altering drug or chemical whose manufacture, possession, or use is regulated by law, typically declared illegal for sale or use, but may be dispensed under a physician's prescription.
DEA	(Federal) Drug Enforcement Administration
DEA Registrant in Good Standing	Any medical practitioner that has a DEA registration, state authorization to practice and, where applicable, state authorization to dispense controlled substances that are still current and in good standing. The DEA expects this will be done simply by checking the latest certificates.
EPCS	Electronic Prescribing of Controlled Substances
Token	A cryptographic key stored on a hardware device (i.e. cell phone, smart card, etc) rather than on a general purpose computer. A hard token is a tangible, physical object possessed by an individual practitioner.
Identity Proofing	Verification that a person is who s/he claims to be and must be conducted by credentialed service providers or certification authorities approved by the General Services Administration (GSA). IdenTrust will perform identify proofing prior to authorizing the purchase of a hard token.
Individual Practitioner	A physician, dentist, veterinarian, or other individual licensed, registered or otherwise permitted, by the United States or the jurisdiction in which they practice, to dispense a controlled substance in the course of professional practice, but does not include a pharmacist, a pharmacy, or an institutional practitioner.
Institutional Practitioner	A hospital or other person (other than an individual) licensed, registered or otherwise permitted, by the United States or the jurisdiction in which it practices, to dispense a controlled substance in the course of professional practice, but does not include a pharmacy.
Logical Access	A user privilege in the EMR software allowing the selected user the ability to administer EPCS capabilities to qualified practitioners. This is not the privilege that allows a provider to electronically prescribe a controlled substance, but more of an administrative privilege.
Prescriber Authorization	The act of permitting a ChartMaker® Clinical user and IdenTrust Token holder the ability to electronically prescribe controlled substances.
Reportable Incidences	Security events that represent successful attacks on the application or other incidents in which someone gains unauthorized access.
Two-Factor Authentication (2FA)	The act of providing unambiguous identification of users by means of the combination of two different components. The factors must include 2 of the following: something you know (i.e. password), something you have (i.e. hard token), something you are (i.e. biometric information).

# **Appendix**

# BUREAU OF NARCOTIC ENFORCEMENT: EPCS REGISTRATION FOR PHYSICIAN ASSISTANTS

Print, complete and submit the form on the following page if you practice in the state of New York and have a Physician's Assistant that needs to notify the BNE of their intent to electronically prescribe controlled substances through ChartMaker® Clinical.

# **Practitioner EPCS Registration**

Amendments to Title 10 NYCRR Part 80 Rules and Regulations on Controlled Substances, adopted on March 27, 2013, authorize a practitioner in New York State to issue an electronic prescription for controlled substances (EPCS) in Schedules II through V. The practitioner must comply with all other State and federal requirements for issuing a prescription for a controlled substance as specified in Article 33 of the Public Health Law, Title 10 of the NYCRR and Title 21 of the Code of Federal Regulations. Pursuant to 10 NYCRR §80.64(b), a practitioner shall use an electronic prescribing application that is consistent with federal requirements to process electronic prescriptions for controlled substances and shall register the certified electronic prescribing computer application that will be used with the New York State Department of Health (Department), Bureau of Narcotic Enforcement. The federal security requirements for EPCS are included in the Drug Enforcement Administration Interim Final Rule, 21 CFR §1300 et seq., and can be accessed via the following link: http://www.deadiversion.usdoj.gov/ecomm/e\_rx/.

To issue electronic prescriptions in compliance with New York State rules and regulations, this registration and attestation must be completed. The attestation herein cannot be completed unless federal requirements have been met, including identity proofing of the practitioner and receipt of two-factor authentication. Please return the completed Practitioner EPCS Registration form and attestation to the email address provided below. A copy of your DEA certification or third party audit approving your electronic prescribing software application must be available for inspection by Department personnel.

Practitioner Name			
*A Physician's Assistant must a number and DEA registration nu	attach a list of their Supervising Physician(s) with their corresponding NYS license umber		
YS License Number DEA Number for NYS			
Practitioner Email Address			
Practitioner Telephone Number			
Name of Certified E-prescribing Software Application	Software Version Certified		
Name of Software Application Provider (Company Na	ame)		
listed above meets federal security requirements f security requirements, including identity proofing Controlled Substances.	rtification or third party audit that the electronic prescribing software application for issuing electronic prescriptions for controlled substances. I have met all federal and receipt of two-factor authentication as required for Electronic Prescribing of		
to a different software application, I will not use the	ich render the software application non-compliant with federal regulations or if I switch he application to issue electronic prescriptions for controlled substances until all federal en registered. When the software is once again compliant, I will register the new nent.		
Practitioner Signature			
Print Name			

Please email the completed form to narcotic@health.state.ny.us with "Practitioner EPCS Registration" in the subject line.

NYSDOH/Bureau of Narcotic Enforcement Practitioner EPCS Registration Riverview Center 150 Broadway Albany, NY 12204

# Index

A	1
Audit Trail · 25, 28 Automatic logoff after token inactivity (in minutes) · 17, 29	Identity Proofing · 30 IdenTrust Token · 15, 19, 21, 22, 24, 29, 30 Incident Reporting · 28 I-STOP · 13
В	L
Best Practices $\cdot$ 29 Bureau of Narcotic Enforcement (BNE) $\cdot$ 13, 14, 31	Logical Access · 20, 22, 27, 29, 30
<u>c</u>	0
Certificate · 4, 19 Controlled Substance Daily Incident Report · 27, 29	Office Hours · 29
Controlled Substance Daily Report Notification · 27 Controlled Substance Drug Log · 25 Controlled Substance Monthly Drug Log · 27, 29	P
Controlled Substance Monthly Drug Log Notification - 27	Prescriber Authorization · 30 Prescriber Setup · 21 Prescription Layout · 23
D	Prescription Monitoring Program (PMP) · 13 Previous Reports · 26
DEA · 28, 29, 30 Detoxification Treatment · 29	R
Distribution Lists · 27 Drug Enforcement Administration Code of Federal Regulations · 29	RDP · 18 Registration for Official Prescription and e-Presc Systems (ROPES) · 14
E	Report Archive · 25, 26 Reportable Incidences · 30 REQUIRED Controlled Substance Daily Incident
Earliest Fill Date · 29 Enrollment, ChartMaker Medical Suite · 4 Enrollment, IdenTrust · 4 Enrollments, Additional · 13	Report Reminder · 27 REQUIRED Controlled Substance Monthly Drug Reminder · 27 Rx Format · 23
EPCS Audit Trail and Drug Log · 25 EPCS Authorization Approval Requested · 22 EPCS Enabled · 21	<u>s</u>
EPCS Prescriber Authorization · 22 EPCS Token Linkage · 21	SafeNet Driver · 15, 29
E-prescribing a Controlled Substance · 24	Schedule II Controlled Substance · 29
G	T
Generate Report · 25 GHB · 29	Two-Factor Authentication · 4, 30
Н	V
	Verification Code · 12

# **Resources / Notes**

Trainer:	Phone:
STI ChartMaker Medical Suite Support:	1-800-487-9135
NOTES:	

# **Document Change Log**

Date	Version	Changes
4/3/15	5.x	Added section on Prescription Layout configuration.
3/18/15	5.x	Added note that the Inactivity Logoff setting for SafeNet needs to be configured per user logging onto the computer.
3/5/15	5.x	Initial Release