NEW YORK GOES PAPERLESS
MARCH 27, 2015
Q: I prescribe medication in New York. Why does EPCS matter to me?
A: Beginning March 2015, paper prescriptions will no longer be accepted.

Beginning March 27, 2015, the state of New York will require all prescriptions, controlled and non-controlled, to be sent electronically [1].

The “Internet System for Tracking Over-Prescribing” (I-STOP) Act was signed into law by the New York State Senate in 2012. Designed to combat the continued diversion and abuse of controlled substances, the law includes provisions such as enacting a prescription monitoring registry to provide timely and enhanced information to practitioners and pharmacists; and requiring all prescriptions to be electronically transmitted.

The New York State Bureau of Narcotics Enforcement (BNE) has set a deadline of March 27, 2015, to comply with the mandate to e-prescribe all drugs, including controlled substances. After this date, New York prescribers will be required to transmit prescriptions electronically, and paper prescriptions will no longer be accepted. If your current prescribing solution does not include EPCS, you will be required to implement a system that does.

This guide outlines the necessary steps to electronically prescribe controlled substances in the state of New York. Please note, although the guide aims to be as thorough as possible, it is not intended to be used as a rigid set of instructions. EPCS criteria may vary among states, and governing bodies reserve the right to modify requirements at any time. The appendix of this guide provides a list of resources to query should you need additional information.

### EPCS Timeline

**JUNE 11, 2012**
I-STOP legislation is passed by the New York State Senate.

**MARCH 30, 2013**
For all patients who lack proficiency in English, prescriptions must indicate the patient’s language of proficiency.

**AUGUST 27, 2013**
Physicians are required to query the Prescription Monitoring Program (PMP) Registry before prescribing any controlled substance.

**MARCH 27, 2015**
All prescriptions (including prescriptions for non-controlled substances) issued in New York State must be electronically transmitted [1].

What you need to get started

The steps below can only be completed by a provider who has access to certified EPCS software. SRxPractice, the e-prescribing application from ScriptRx, offers solutions for e-prescribing of all drugs, including controlled substances.

Visit http://scriptrx.com/srxwrite to learn how SRxPractice can help you write prescriptions more efficiently.

Some states may have regulations that require additional steps not described in this guide. Please consult your state’s department of health or appropriate governing body for additional information.

**STEP 1  Identity Proofing**

In order to use SRxPractice to e-prescribe any substance, controlled or non-controlled, you will need to complete the identity proofing process and purchase a digital certificate. ScriptRx has partnered with IdenTrust to provide the identity proofing required to e-prescribe.

There are two types of certificate that can be purchased from IdenTrust. The first type, an Unaffiliated Individual certificate, provides a single user with a digital certificate that allows e-prescribing of non-controlled substances only. The second type, an Unaffiliated Individual Hardware certificate, provides a single user with a digital certificate and the hardware necessary to enable e-prescribing of all drugs, including controlled substances.

When selecting Unaffiliated Individual Hardware certificate, you will be asked to choose between two hardware packages, based on your needs. You can purchase a Smart Card and Smart Card Reader, or just a Smart Card if a reader has already been installed at your facility. The Smart Card holds your unique digital certificate. Each time you electronically prescribe a controlled substance, you will be required to insert the Smart Card into the Smart Card Reader to verify your identity.

Once the identity proofing process has been completed, your certificate and any applicable hardware will be sent to you. Upon receipt, carefully follow the instructions provided by IdenTrust to activate your new Smart Card.

Visit http://identrust.com/scriptrx to learn more.

**STEP 2  Register Your Software**

Prescribers are required to register their software with the New York Bureau of Narcotic Enforcement (NY BNE). This is accomplished by submitting a completed “Practitioner EPCS Registration” form (a copy of the form can be found at the back of this guide). ScriptRx simplifies this process by providing you with exactly the information you need to fill in the form correctly the first time. You should also keep available a copy of the document that certifies ScriptRx’s application is approved for EPCS, as this may be requested by the NY BNE.

Once completed, submit the form to narcotic@health.state.ny.us with “Practitioner EPCS Registration” as the subject line.

**STEP 3  Implementation and Activation**

After obtaining your credentials from IdenTrust; a site certificate from the Drummond Group; and registering the software with the NY BNE, a provider is now ready to be activated for EPCS. In addition to the credentials listed above, your ScriptRx Implementation Manager will need the names of two authorized individuals who will be responsible for granting EPCS permissions at the facility.

'Step 3: Facility Survey’ continued on p.3
Once you’ve gathered the required documents, provide them to your Implementation Manager in order to activate EPCS in SRxPractice. They will provide the two individuals authorized to activate EPCS with detailed instructions on how to complete the process. Please note, although the activation process requires two authorized individuals, only one is required to have a digital certificate.

**CONGRATULATIONS**

You’ve accomplished a lot by choosing to EPCS:

1. Writing prescriptions will be faster than ever.
2. You’ll drastically reduce transcription errors due to illegibility.
3. Your patients will appreciate a shorter wait at the pharmacy.
4. You’re helping put a stop to controlled substance abuse.

Keep track of your documents and stay in touch with your Implementation Manager; remember, they’re here to assist you throughout the process and want you to succeed.
New York Goes Paperless
Your Guide to I-STOP Compliance and EPCS

Appendix

**ScriptRx**
http://www.scriptrx.com

**Identrust**
http://www.identrust.com

**New York State Department of Health**
https://www.health.ny.gov
[EPCS general information] https://www.health.ny.gov/professionals/narcotic/electronic_prescribing
[Instructions for the Practitioner EPCS Registration Form] https://www.health.ny.gov/professionals/narcotic/electronic_prescribing/practitioner_epcs_form_instructions.htm

**Drummond Group**
http://www.drummondgroup.com

**Surescripts**
http://www.surescripts.com

**Drug Enforcement Administration: Office of Diversion Control**
http://www.deadiversion.usdoj.gov
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 attach a list of their Supervising Physician(s) with their corresponding NYS license number and DEA registration number

NYS 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 Name) ___________________________

**Attestation:** I affirm that I have received a DEA certification or third party audit that the electronic prescribing software application listed above meets federal security requirements for issuing electronic prescriptions for controlled substances. I have met all federal security requirements, including identity proofing and receipt of two-factor authentication as required for Electronic Prescribing of Controlled Substances.

If I become aware or am notified of any issues which render the software application non-compliant with federal regulations or if I switch to a different software application, I will not use the application to issue electronic prescriptions for controlled substances until all federal requirements are met and the application has been registered. When the software is once again compliant, I will register the new certification with the Bureau of Narcotic Enforcement.

Practitioner Signature ___________________________ Date _____ / _____ / _____

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