

**E-Signature:
Verification & Non-repudiation**

The Pharmacy Perspective

Issues for Pharmacy Patient Identification

- **Validation of the Prescription**
 - **Written**
 - Difficult to read
 - Authentication can be difficult
 - **Phone**
 - Difficult to authenticate
 - **Fax Prescription**
 - Difficult to authenticate source
 - **Critical information may be missing**
 - Routine to see prescriptions missing quantity, directions or signature
 - **Patient ID information**
 - **Critical to Match prescription to correct profile**
 - Failure compromises DUR
 - Frustrates claim submission or delays service
 - **Minimal Important elements:**
 - Name, Address, birth date, sex
 - **Pharmacist must rely on person presenting the prescription not always the patient.**

Issues for Pharmacy

Patient Identification

- **Validation of the Prescription**
 - **Written - Phone - Fax Prescription**
 - e-prescription consolidates to one method
 - **Critical information may be missing**
 - e-prescription requires critical information to transmit
 - **Patient ID information**
 - **Critical to Match prescription to correct profile**
 - e-prescription solves through matching to patient profile at office
 - **Minimal Important elements:**
 - e-prescription solves through sending patient demographics on file at office
 - **Pharmacist must rely on person presenting the prescription not always the patient.**
 - e-prescription solves through sending patient demographics on file at office

Issues for Pharmacy Prescriber Authentication

- **Validation of the Prescriber**
 - **Familiarity with Prescriber**
 - Proximity to Prescriber office
 - Rural locations - pharmacy trade area is wide
 - City - Pharmacy may or may not be in close proximity to physician.
 - **Stamped physician signatures –**
 - Pre-signed prescriptions.
 - **Large clinics**
 - Multiple prescribers using a single prescription design
 - Difficult to match signature to Prescriber name.
 - Stolen and forged
 - Teaching institutions
 - **Prescriber with multiple practices**
 - Pharmacy must choose proper location - affects subsequent refill authorizations

Issues for Pharmacy

Prescriber Authentication

- **Validation of the Prescriber**
 - **Familiarity with Prescriber**
 - e-prescription solves by transporting prescriber information
 - **Stamped physician signatures**
 - e-prescription solves using same process or all prescriptions
 - **Large clinics**
 - e-prescription solves, each prescriber has a unique SPI
 - e-prescription protects integrity of the prescription through secure network
 - **Prescriber with multiple practices**
 - e-prescription solves by mapping to the location of origin through SPI.
 - **New Prescribers**
 - e-prescription solves through validation of new users including DEA, address and Phone number

e-Prescribing Security Network

- Pharmacy connects to aggregator -such as Proxymed & SureScripts
 - Provides secure prescriber directory to allow access to network
 - Certification validates prescriber information - name, address, phone, DEA#, state license #.
 - Assigns unique SureScript Prescriber Identification (SPI)
 - Electronic log of all transactions
 - NCPDP Script Format Message

Host Pharmacy System

- Validate prescriber registrations
 - Unique to each Prescriber practice site.
- Assign unique identifier for physician registrations
- Firewalls - prohibit outside access
- Dedicated lease line to aggregators, VPN line or SSL - only recognized access.
- Current pharmacy validation process, physician & patient
- Monthly Prescriber file updates provide prescriber demographics

Recommendations Security & Authentication

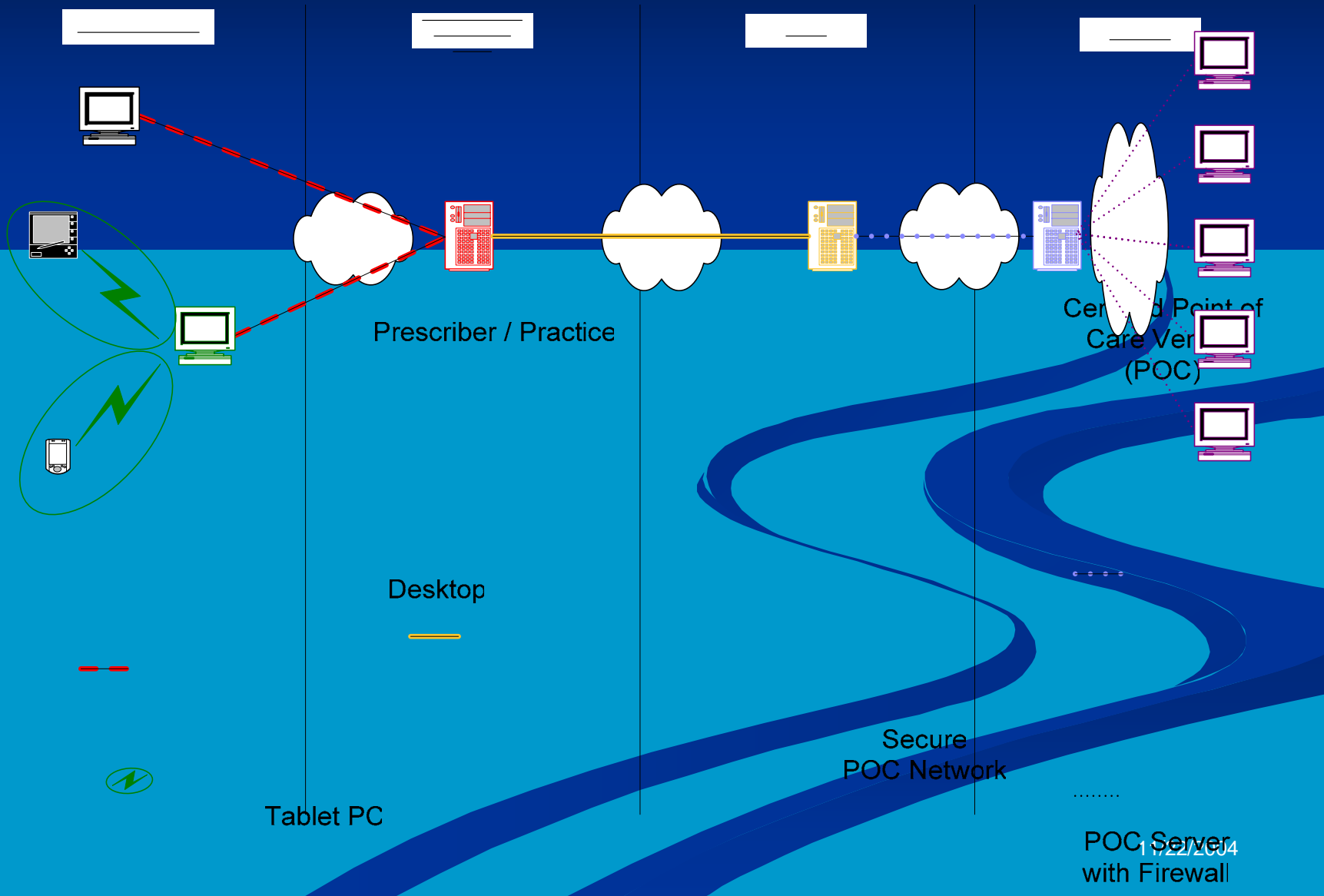
■ Pharmacy and Aggregators

- Secure connection – Direct line, SSL & VPN Connections
- Private data circuit
- Encrypted messaging
- Standards to prevent altering transactions- NCPDP Script

■ Pharmacy

- Firewalls
- Encryption
- Unique Pharmacy (NCPDP) & Prescriber ID (SPI)
- No unauthorized access
- Log files for all transactions

Electronic Prescribing Security and e-Signature Infrastructure



HHS Fact Sheet: HIT Report At-A-Glance

“Use of modern information technology has the potential to transform the delivery of health care in America for the better – and to do so without heavy-handed regulation or upheaval in the health care sector”

HHS Press Office Wednesday July 21, 2004

e-Prescribing in Today's Retail Environment

- Paper based prescription orders pose many problems
- Security intrinsic to SureScripts has been adequate to ensure authentication and non-repudiation.
- No immediate need for Digital Signatures beyond current validation process.
- Security already built into systems in use by retail industry today makes e-Signature requirement less urgent.
- Requiring Digital Signatures at this time would significantly impede the progress of e-prescribing and the benefits patients and practitioners would realize from its implementation.

Pharmacy Practice System

- Recognizes & maintains valid prescriber registration information
- Recognizes & maintains accurate patient information
- Integrates eprescriptions within pharmacy practice system.
- Secure - firewalls - HIPAA compliant restricts access.

Important Concepts to Keep in Mind

- No substitute for pharmacists' professional judgment – ultimate responsibility for ensuring authenticity and accuracy of prescriptions rests with the dispensing pharmacist whether the RX is delivered manually or electronically.
- There is no perfect system