

Alan McGill

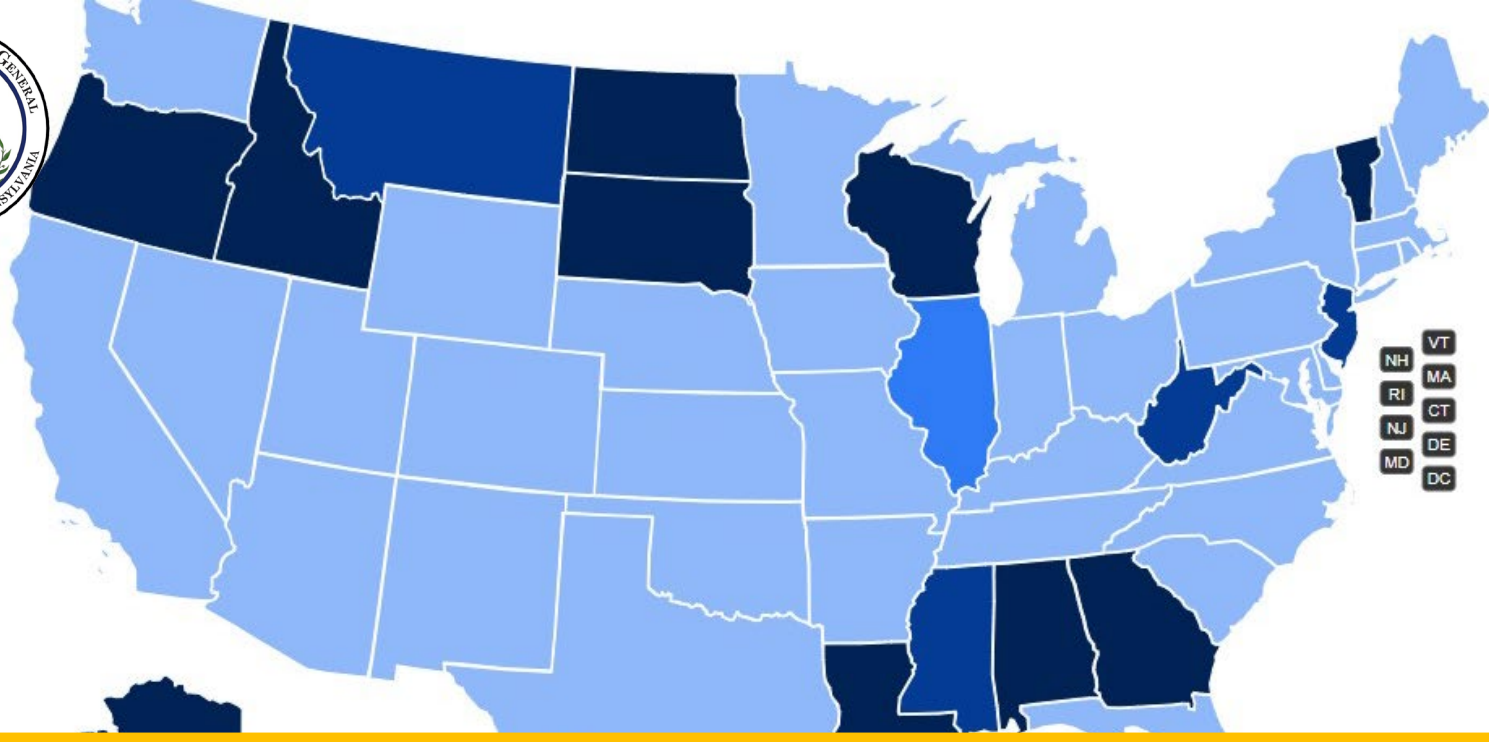
Senior Supervisory Special Agent

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Office of Public Engagement

How PDMP & Law Enforcement are Dealing with Fraudulent Prescriptions





e - PRESCRIBING

32 states mandatory

8 states pending

NO DEA Mandate but DEA Requirements – 21 CFR 1300



**Must follow State Laws which may be
more strict**



DEA Requirements if choosing e-scribe

Third Party Auditor

Identity Proofing

Two Factor Authentication Credentials

Hard Token

- Cryptographic Key stored on a device, cell phone, USB, etc.



DEA e-SCRIBE REQUIREMENTS CONT.

- DEA requirements
 - Staff can fill required Rx info, but Practitioner **must** review before e-signing
 - Must retain electronic records, min. two years
 - Information on e-prescription *same as paper*
 - Full name address of patient
 - Drug name, strength, dosage, quantity, directions for use
 - Name, address, registration of practitioner
 - Signature & Date of Practitioner using two-factor auth. credential



LAWS & REGULATIONS

- Illegally Obtaining
- HIPAA Exceptions
- Record Keeping Requirements
 - Usually satisfies best evidence
- Pharmacist Corresponding Duty



Thank You

Questions?

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