

EPCS Audit Requirements

ASAP Conference

January 2012

Disclosures

Ron Fine is the Vice President, National Health Plan Accounts with CoverMyMeds. The conflict of interest was resolved by peer review of the slide content.

ASAP's and NCPA's education staff declares no conflicts of interest or financial interest in any product or service mentioned in this program, including grants, employment, gifts, stock holdings, and honoraria.

Pharmacist Learning Objectives

Upon completion of this activity, participants will be able to:

- Discuss the auditing requirements in the Interim Final Rule (IFR) from DEA (March 31,2010).
- Discuss the difference in certification for SCRIPT standard and the “third-party” auditing requirements.
- Discuss the future auditing requirements as defined in the IFR.

DEA Interim Final Rule on EPCS

- What is DEA Interim Final Rule on EPCS?
 - IFR effective date 6/1/2010
- What is the audit requirement in the IFR for any system creating or accepting EPCS?
 - How is this different than certification by e-prescribing switch vendor?

Who can perform the required audit?

- Entities that can perform the EPCS audit
 - American Institute of Certified Public Accountants
 - SysTrust
 - WebTrust
 - SAS 70 (SOC as of 2011)
- What is being audited?
 - Document of control
- How is the audit performed?

On going requirements

- What are the requirements after the initial audit is performed?
 - Re-certification is required after system changes prior to deployment
 - Re-certification is required every two years even if no changes are made to the application

DEA Approvals

- What are requirements for auditors?
- What approvals are required by DEA?
- Questions?