



Policy & Procedure Manual

Electronic Prescribing of Controlled Substances

Sample Version

Questions? Send email to inquire@sujansky.com

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1 Introduction

This manual documents the official policies and procedures governing the electronic prescribing of controlled substances (EPCS) at medical practices that use EHRs certified for EPCS. The intended audience for this document is the physicians at these practices, as well as the administrative and I.T. personnel who will assist them in setting up and using the EPCS functionality.

Sections 2 and 3 are omitted from this public version.

4 EPCS Policies

The sections below specify the practice's official policies that govern the provisioning and prescribing processes for EPCS.

4.1 Eligibility to Prescribe Controlled Substances Electronically

To be granted authority to electronically prescribe controlled substances using the EHR, a clinician must meet all of the following eligibility criteria:

1. The clinician must work for a medical practice affiliated with enterprise.
2. The clinician must be an M.D. or a D.O.
3. The clinician must have a current DEA registration that is unexpired and in good standing, and that is valid for prescribing controlled substances in California.
4. The clinician must have a current California state medical license that is unexpired and in good standing.
5. The clinician must have or be eligible to have an EHR user account of type "User/Provider," with enrollment in SureScripts RxHub.

4.2 Eligibility to Serve as an EPCS Approver

1. Approver must have a current DEA registration that is unexpired and in good standing.
2. Approver must have a current California state medical license that is unexpired and in good standing.
3. Approver must have an EHR account of type User/Provider.
4. Approver must have been issued a two-factor authentication token and must have successfully completed the registration and identity-proofing process for that token. To approve a specific clinician for EPCS, the Approver must have been designated by the clinician's practice location as an EPCS approver for that practice's clinicians.

The remaining policies are omitted from this public version.

5 EPCS Procedures

The sections below specify the practice's official procedures related to the provisioning and prescribing processes for EPCS.

5.1 Designating Granters and Approvers for a Practice Location

1. Each practice location must designate at least two individuals (per the process below) to serve as EPCS Granters for that location and at least two individuals to serve as EPCS Approvers for that location.
2. I.T. staff will provide the practice location a paper form with a list of eligible Granters and Approvers to select from. The practice location is encouraged to select as many of these individuals as possible, to minimize the chances that an individual will not be available at the time that a Granting or Approval action is required.
3. Upon completion, the selection form must be dated and signed by a DEA Registrant working at the practice location.
4. The signed form must be returned to the I.T. department. The form may be return by mail, fax, or email (scanned). The relevant return addresses will be provided on the form.
5. Upon receipt, the I.T. department will record the practice location and the designated Granters and Approvers for that location. Elsewhere, all of the EHR clinician users who practice at that location will be cross-referenced to the list of designated Granters and Approvers for the location, and these association will be recorded so that, for any specific clinician, the designated Granters and Approvers can be readily determined.
6. The I.T. department will maintain the completed, signed, and returned forms on file for audit purposes.

The remaining procedures are omitted from this public version.