

Electronic Prescriptions for Control Substances (EPCS)

Texas Department of Public Safety (DPS) – Schedule II Controlled Substances

The Drug Enforcement Administration (DEA) issued rules in 2010 that allowed for the electronic transmission of controlled substances prescriptions that included a requirement for the certification of both the prescriber software system and pharmacy software system by an independent third party auditor.

Texas DPS has adopted the same requirements and updated their rules and regulations in October, 2013, to allow Schedule II controlled substances to be transmitted electronically.

As of March 1, 2014, Texas DPS has concluded beta testing of electronic transmission of Schedule II drugs with a small number of prescribing physicians and pharmacies. The purpose of the pilot was to ensure that Schedule II prescriptions were reported accurately to the Texas Prescription Monitoring Program (PMP).

Below are guidelines for EPCS of Schedule II Controlled Substances for Texas Prescribers and Pharmacies.

Prescribers

1. Confirm with your e-prescribing software vendor that the software application is EPCS certified per the DEA requirements.
2. Confirm that the EPCS functionality has been activated in the state.
3. Confirm that the software vendor has notified Surescripts or the appropriate electronic prescription switch vendor that both the application and the prescriber have been certified and are eligible to transmit Schedule 2-3-4-5 electronic prescriptions. If the switch vendor is not notified, the transaction will be blocked before it reaches the pharmacy.
4. Understand that not all pharmacies are certified yet to accept EPCS transactions. This may result in a message being returned when attempting to transmit an electronic prescription for a controlled substance to an ineligible pharmacy.

Pharmacies

1. Confirm with your software vendor that the software application is DEA EPCS certified
2. Confirm that the EPCS functionality has been activated
3. Determine whether or not your electronic prescription switch vendor (Surescripts and others) validate that prescribers are certified to prescribe Schedule 2-3-4-5 electronically, and whether your system can prevent invalid electronic prescriptions from being processed.

4. Texas DPS Official Prescription Program requires a Control Number assigned by DPS for each Schedule II prescription and the reporting of that Control Number to the PMP. DPS has designated the placeholder value of 010000000000 (01 plus 10 zeroes) as the E-Prescription Control Number.”
5. When reporting electronic Schedule II prescriptions to the Prescription Monitoring Program, pharmacies must submit a Control Number of “010000000000”, along with origin code value of “05”. Visit with your pharmacy software vendor for clarification on correctly populating these required fields. Failure to report these values will result in a rejection from the Prescription Monitoring Program in addition to being a record keeping violation.
6. Notify your software vendor that a rejection may also occur if an alphanumeric value is reported in field DPS 19 to the PMP. This can be avoided by not transmitting a value in this data element of the report.
7. Once the above situations have been addressed, inform all pharmacists and pharmacy staff that your pharmacy system is certified to accept all electronic prescriptions including Schedule 2-3-4-5. All electronic prescriptions are processed in the same manner.
8. More information can be found on the Texas DPS website:
<http://www.dps.texas.gov/RSD/ControlledSubstances/News/index.htm>.

Electronic vs. Written Prescriptions

The use of electronic prescriptions for both legend and controlled substances provides several benefits to prescribers and pharmacies, including improved patient care.

Pharmacy	Prescriber
Decreases phone calls	Spending less time on the phone/fax
Eliminates verbal misinterpretations	Improved security and confidentiality
Increases prescription accuracy	Improved patient safety

There may be certain situations that will require the electronic prescription to be resubmitted, or where a written prescription could better serve the patient. Examples include:

- 1) Issuance of multiple prescriptions for schedule II controlled substances
 - Some pharmacy software systems are not designed to allow for “holding” electronic prescriptions for dispensing at a later date. In these cases, the electronic prescription may need to be re-issued for the subsequent months. Another option would be to provide a written prescription to cover months 2 and 3.
- 2) Pharmacy is out of stock for a CII drug
 - If the pharmacy does not have a schedule II drug in stock, they may not be able to forward the electronic prescription to another pharmacy for dispensing. Another electronic or written prescription may need to be issued in these cases for the secondary pharmacy to provide the medication to the patient.