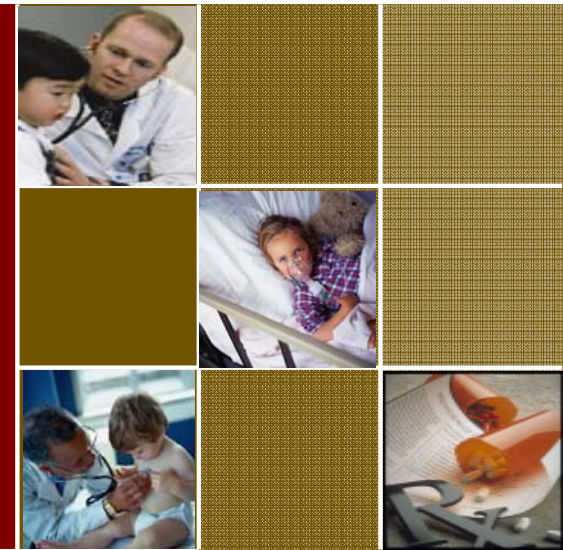


A Prescription for Quality Healthcare



NCVHS Testimony
E-signature Standards
Router Perspective



Teri Byrne, RxHub
December 08, 2004

RxHub Practices

–Current

- Point Of Care (POC) user authentication and authorization contractually required
- IP Address verification – sender and receiver
- Participant ID and password verification
- Secure encrypted channel
- Transaction audit
 - Date/time, sender, receiver, control numbers...
- Meets HIPAA requirements for PHI
- Prescriber and pharmacy are identified in the transaction based on the SCRIPT standard
- Industry accepted security controls/processes implemented
- RxHub does not open the 'envelope' – just header for routing information

Note: As secure (if not more) than paper or fax prescriptions

–Future

- Translation between standards and versions – identified as an industry need

Electronic Prescribing Issues

- Today some state regulations are inconsistent or unclear
- Prescriptions can be written in a different state than the pharmacy that fills the prescription
- State regulations don't always consider electronic prescribing and in some cases prohibit electronic prescribing
- Pharmacists unsure of how to determine authenticity of an electronic prescription
 - Pharmacists may call prescriber to verify
 - Pharmacist may print and fax the prescription to prescriber for signature
- The definition of “electronic signature” is not clear

Digital Signatures

- Expensive and onerous to implement
- Multiple standards – not one solution
- Will deter adoption of electronic prescribing
- Translation of versions and standards (interoperability) adds complexity – need to define scope of content for digital signature
- Does this solve the pharmacists concern for non-repudiation?
- Will still require work flow standards for physician systems
- Need industry experience before designing and implementing a more complex solution
- Would require a federal mandate to implement digital signatures nationwide

Recommendation

- NCVHS should recommend the adoption of current 'best practices' as adequate standards for electronic prescribing
 - POC user authentication and authorization
 - Unique user ID's and passwords
 - Unique participant ID's and passwords
 - Secure encrypted channels for communications
 - IP address verification
 - Transaction audits
 - Allow translation between standards and versions