



# **SECURITY OF ELECTRONIC PRESCRIPTIONS**

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**Ohio State Board of Pharmacy**



# **Duties of the Ohio Pharmacy Board**

- **Licensing/Administrative Agency**
- **Law Enforcement Agency**

**Enforcement Responsibility – ORC**

**2925. – Criminal Drug Laws**

**3715. – Food & Drug Laws**

**3719. – Controlled Substance Laws**

**4729. – Pharmacy/RX Drug Laws**



# WHY DO DEA & THE BOARDS EXIST?

Protection of the public through the enforcement of laws against those members of a profession/society who act in an **illegal**, immoral, incompetent, or impaired way.



# **WHY DO DEA & THE BOARDS EXIST?**

**Most HC professionals are honest and truly care about their patients. Some, however, are not and do not.**

**It is the last group for which the Boards (and DEA) were formed.**



# **WHY DO DEA & THE BOARDS EXIST?**

**The goal is to be able to deal effectively with the dishonest people while minimizing the effect on the practices of the honest ones.**



Ohio State Board of Pharmacy



# **OSBP PRINCIPLES RE COMPUTER SECURITY**

**Since 1991, the Ohio Board  
of Pharmacy has operated  
under the following  
principles for computer  
security:**



# **OSBP PRINCIPLES RE COMPUTER SECURITY**

**The current paper and  
telephone system has MAJOR  
flaws. Electronic systems can  
and must do better.**



**RX SECURITY COMMENTS**

**PASSWORDS ARE**

**WORTHLESS**

**AS A MEANS OF COMPUTER**

**SECURITY IN A HEALTHCARE**

**SETTING.**



**RX SECURITY COMMENTS**

**PASSWORDS ONLY**

**PROTECT HONEST**

**PEOPLE FROM OTHER**

**HONEST PEOPLE.**



# **RX SECURITY COMMENTS**

**FOR MANY HEALTHCARE PROFESSIONALS, THE METHOD OF CHOICE FOR ENTERING A PASSWORD IS BEST DEFINED BY THE PHRASE:**





# **RX SECURITY COMMENTS**

**H.C. PROFESSIONALS CANNOT  
CALCULATE THE HEXADECIMAL  
EQUIVALENT OF OUR DOG'S  
BIRTHDAY RAISED TO THE 27<sup>TH</sup>  
POWER AND THEN DIVIDED BY  
THE JULIAN DATE LIKE MOST  
COMPUTER PEOPLE !**



# **RX SECURITY COMMENTS**

**W284K-Rqh66-QGRj4-8yQX3-9Wk8T**

**IS NOT SOMETHING WE  
COULD MAKE UP OR  
REMEMBER!**



# **RX SECURITY COMMENTS**

**Then, 6 weeks later and after we FINALLY have it memorized, the security conscious computer whizzes tell us that one is no longer valid and we need to use:**

**QP632-176tU-8739B-h257G-5uU2X**



# **RX SECURITY COMMENTS**

**When we think of  
passwords, we think of our  
pet's name or something  
else simple:**

**FIFI, or BEARS, or KIM**



**Anyone within 5 feet of us  
can pick up our password.  
Therefore, there is no proof  
beyond a reasonable doubt  
about who actually  
performed the action.**



**It's not even reliable,  
probative, and substantive  
(burden of proof for  
administrative hearings – at  
least in Ohio).**



# **Ohio Administrative Code Rule 4729-5-01(N)**

**"Positive identification" means a method of identifying an individual who prescribes, administers, or dispenses a dangerous drug.**



# **Ohio Administrative Code Rule 4729-5-01(N)**

**(1) A method may not rely solely on the use of a private personal identifier such as a password, but must also include a secure means of identification such as the following:**



# **Ohio Administrative Code Rule 4729-5-01(N)**

- (a) A manual signature on a hard copy record;**
- (b) A magnetic card reader;**
- (c) A bar code reader;**
- (d) A thumbprint reader or other biometric method;**
- (e) A proximity badge reader;**
- (f) A board approved system of randomly generated personal questions;**



# **Ohio Administrative Code Rule 4729-5-01(N)**

- (g) A printout of every transaction that is verified and manually signed within a reasonable period of time by the individual who prescribed, administered, or dispensed the dangerous drug.**
- (h) Other effective methods for identifying individuals that have been approved by the board.**



# **Ohio Administrative Code Rule 4729-5-01(N)**

**(2) A method relying on a magnetic card reader, a bar code reader, a proximity badge reader, or randomly generated questions for identification must also include a private personal identifier, such as a password, for entry into a secure mechanical or electronic system.**



Doctor's Office

Vendor &/ or Switch

Pharmacy

**With a password only system, you CANNOT tell me who is sitting at the Doctor's terminal. You can only guess.**



# **FINAL COMMENT TO DEA & HHS**

**Security of RX MUST  
begin at order entry by  
the prescriber or you are  
wasting time and money  
on the rest of the system.**