



Steven C. Anderson, IOM, CAE
President & Chief Executive Officer

August 1, 2017

The Honorable Katherine Clark
House of Representatives
1415 Longworth House Office Building
Washington, DC 20515

The Honorable Markwayne Mullin
House of Representatives
1113 Longworth House Office Building
Washington, DC 20515

Dear Representative Clark and Representative Mullin:

The National Association of Chain Drug Stores (NACDS) is pleased to support H.R. 3528, the Every Prescription Conveyed Securely Act, your legislation to amend the Social Security Act to require electronic prescribing for controlled substance medications in Medicare Part D.

We believe the legislation is an important step in combatting the abuse and diversion of prescription opioid medications. Electronic prescribing of controlled substances adds new dimensions of safety and security. Prescribers can more easily track the controlled substance prescriptions a patient has received. Additionally, electronic controlled substance prescriptions cannot be altered, cannot be copied, and are electronically trackable. Furthermore, the federal DEA rules for electronic controlled substances prescriptions establish strict security measures, such as two-factor authentication, that reduce the likelihood of fraudulent prescriptions.

Chain pharmacy supports policies that promote the use of electronic prescribing technology to transmit prescription information between prescribers and pharmacists. Over the years, federal policies have been implemented to encourage and facilitate electronic prescribing, including the Medicare Improvements for Patients and Providers Act (MIPPA, 2008), which offered financial incentives for providers to facilitate the use of electronic prescribing; the Medicare and Medicaid Electronic Health Record Incentive Programs (2011), which required healthcare providers to demonstrate meaningful use of electronic health records by meeting several program objectives, including e-prescribing; and a DEA Interim Final Rule (2010) to allow the electronic transmission of all controlled substance prescriptions. These federal policies have helped to further encourage widespread adoption and use of electronic prescribing technologies.

Despite the numerous benefits of electronic prescribing, there are situations in which electronic prescribing is not feasible or may not be possible. We are pleased that your legislation acknowledges these circumstances and appropriately addresses them.

Thank you for your well-crafted legislation and leadership on this issue. We stand ready to work with you to further combat the diversion and abuse of opioid medications. If you have any questions, please contact Tom O'Donnell, Senior Vice President, Government Affairs and Public Policy at (703) 837-4214 or todonnell@nacds.org.

Sincerely,

Steven C. Anderson, IOM, CAE
President and Chief Executive Officer