



AMERICAN ACADEMY OF
FAMILY PHYSICIANS
STRONG MEDICINE FOR AMERICA

June 3, 2015

Chuck Rosenberg, Acting Administrator
Drug Enforcement Administration
Office of Diversion Control
Attn: Liaison and Policy Section
8701 Morrissette Drive
Springfield, VA 22152

RE: Improving the electronic prescription of controlled substances

Dear Acting Administrator Rosenberg,

On behalf of the American Academy of Family Physicians (AAFP), which represents 120,900 family physicians and medical students across the country, I write to insist that the Drug Enforcement Administration (DEA) promptly change the current rules for electronic prescribing of controlled substances so that the electronic prescriptions can be sent more easily to the pharmacy directly in a safe and secure manner. The DEA can and should take immediate action to protect patients and to streamline electronic prescribing.

The AAFP calls on the DEA to lead an effort to promote electronic prescribing of controlled substances (EPCS) on a national level so that states are not forced to impose onerous and patchwork requirements for prescribing controlled substances as well. Although the DEA issued a [ruling](#) in 2010 calling for safe and legal EPCS, implementation has been extremely slow due to the need for provider compliant software, pharmacy compliant software, and a two-factor authentication technology required for EPCS. Only 2.2 percent of medical providers in the country are enabled for EPCS, despite 72 percent of total providers electronically prescribing other medications. Meanwhile, fewer than half of pharmacies are enabled for EPCS, even though 95 percent of all pharmacies are equipped to receive electronic prescriptions of other medications

The AAFP strongly agrees with the intent of the DEA ruling to decrease the diversion of controlled substances. While this is a laudable goal, the rate of medication diversion reported by the Substance Abuse and Mental Health Services Administration has not changed since the ruling due to difficulty in implementation. More should be done to facilitate EPCS, since research shows that paper prescriptions for controlled substances increase the amount of diversion.

The AAFP continues to advocate for secure electronic prescribing and electronic signatures of controlled substances in any setting. Widespread use of EPCS is consistent with the advances in technology and would prevent patients from modifying paper prescriptions. Paper prescriptions can be dangerous for patients who carry the paper prescription, which can be stolen. On the other hand, e-prescribing makes pain medication more accessible to the patients who genuinely need it in a more timely fashion.

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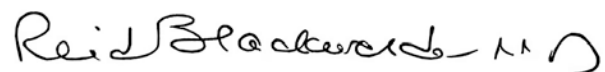
Acting Administrator Rosenberg

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For any questions you might have please contact Robert Bennett, Federal Regulatory Manager, at 202-232-9033 or rbennett@aafp.org.

Sincerely,

A handwritten signature in black ink that reads "Reid B. Blackwelder MD". The signature is written in a cursive style with a large, stylized "R" and "B".

Reid B. Blackwelder, MD, FAAFP
Board Chair