March 29, 2018

The Honorable Joann Ginal
        & Members of the House Health, Insurance and Environment Committee
Colorado General Assembly
State Capitol - 200 East Colfax Avenue
Denver, CO 80203

By Email

**RE:    SUPPORT H.B. 18-1279 MANDATORY E-PRESCRIBING OF CONTROLLED SUBSTANCES**

Dear Chair Ginal and Members of the House Health, Insurance and Environment Committee:

As stakeholders committed to promoting policies to help turn the tide in the opioid crisis plaguing our country, we urge your support for H.B. 18-1279. This important legislation would require controlled substances to be electronically prescribed, thereby reducing the likelihood of diversion, fraud, and abuse of these medications.

For controlled substances prescriptions in particular, use of electronic prescribing technology adds new dimensions of safety and security in the prescribing process. Data from self-reported drug abusers suggest that between 3% and 9% of diverted opioid prescriptions are tied to forged prescriptions.[i,ii] Electronic controlled substance prescriptions serve to reduce the likelihood of diversion in this manner, as electronic controlled substance prescriptions cannot be altered, cannot be copied, and are electronically trackable.

Importantly, the federal DEA rules for electronic controlled substances prescriptions establish strict security measures, such as two-factor authentication, that reduce the likelihood of fraudulent prescribing. Notably, the state of New York saw a 70% reduction in the rate of lost or stolen prescription forms after implementing its own mandatory electronic prescribing law.[iii] Additionally, the incidence of doctor shopping in that state decreased by 7.6%.[iv]

While the rate of electronic prescribing has increased significantly in recent years, there is room for further improvement, particularly with controlled substances prescriptions which lag behind in overall adoption rates. Surescripts data from January 2018 shows that of the 1.67 million electronic prescriptions issued in Colorado in a one-month period, a disproportionately low percentage of those electronic prescriptions - only 4.57% - were for controlled substances.[v] Nationally, 13.1% of all prescriptions prescribed are for controlled substances.

To enhance healthcare providers' utilization of this beneficial technology and to foster prescriber adoption, we urge Colorado lawmakers to enact H.B. 18-1279.

Sincerely,

Colorado Retail Council, Angie Baker
Academy of Managed Care Pharmacy, Reginia Benjamin
Albertsons Companies, Nikki Price
CVS/Health, Rachel Lee
Express Scripts, Michelle Mack
Genoa, Dale Masten
HealthMart, Chris Dimos
Imprivata, Stuart Chapman
National Association of Chain Drug Stores, Mary Staples
Pharmaceutical Care Management Association (PCMA), Melodie Shrader
Rite Aid, Mike Podgurski
Surescripts, Ken Whittemore
Walgreens, Mike Smith

[i] Rosenblum, Andrew, et al., "Prescription Opioid Abuse Among Enrollees into Methadone Maintenance Treatment," *Drug and Alcohol Dependence,* 90.1 (2007): 64-71.

[ii] Inciardi, James A., et al., "The 'Black Box' of Prescription Drug Diversion," *Journal of Addictive Diseases*, 28.4 (2009): 332-347.

[iii] Remarks of Anita Murray, Deputy Director, New York State Department of Health at the Harold Rogers Prescription Drug Monitoring Program National Meeting (September 6, 2017).

[iv] After initially enacting the I-STOP law (which mandated both prescriber use of the PDMP and e-prescribing), the New York Bureau of Narcotics and Enforcement initially saw a 91.2% reduction in the rate of doctor shopping. Now that the e-prescribing mandate has been implemented, February 2018 data shows that there has been a 98.8% reduction in incidence of doctor shopping since before I-STOP. BNE is estimates that the additional decrease was, in part, due to e-prescribing. Data provided by Anita Murray, Deputy Director, New York State Department of Health (February 26, 2018)

[v] Surescripts Colorado Electronic Prescribing of Controlled Substances Prescriber and Pharmacy Enablement Status Report – January 2018.