



EPCS Initial Certification

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DRUMMOND

**Your Partners
In Compliance**

TABLE OF CONTENTS

TABLE OF CONTENTS.....	1
WHO IS DRUMMOND GROUP?.....	2
EPCS (ELECTRONIC PRESCRIBING OF CONTROLLED SUBSTANCES)	2
ADDITIONAL CERTIFICATION SERVICES	2
DRUMMOND EPCS CERTIFICATION PROCESS PHASES.....	3
Phase 1 – Understand EPCS DEA Requirements.....	3
Phase 2 – Security Review	3
Phase 3 – Design Review/Implementation Tracker	3
Phase 4 – Pre-Certification Review	3
Phase 5 - EPCS Final Test	4
ADDITIONAL IMPORTANT INFORMATION.....	5
TEST METHOD	5
CERTIFICATION SEAL.....	5
TEST PRICING	5
RE-TESTING	5
REGISTER FOR TESTING.....	6



WHO IS DRUMMOND GROUP?

Founded in 1999, [Drummond Group LLC](#) is a leader in innovative, global software testing, certification, and auditing which synergistically advance and connect technologies, standards, security and interoperability in vertical industries – smart grid, automotive, health care, pharmaceutical, financial services, government, petroleum, pharmaceutical and retail. Going well beyond the scope of traditional "paper audits," Drummond has developed procedures, test cases and even additional software to conduct and assess the results of functional tests of software applications - individually in their installed environments (conformance) and in multiple-connected groups when applications of different vendors are brought together for a sequence of conformance and interoperability tests. As a trusted, experienced and accredited software test lab, Drummond offers global test services throughout the product life cycle, including certification, auditing, quality assurance and conformance testing.

EPCS (ELECTRONIC PRESCRIBING OF CONTROLLED SUBSTANCES)

The Drug Enforcement Administration (DEA) officially listed Drummond on the Electronic Prescriptions for Controlled Substances (EPCS) "[Approved Certification Process](#)" list in 2012 as one of the first to be approved. Drummond serves as a DEA approved, neutral, third-party test lab for EPCS applications used to process EPCS by practitioners, hospitals and pharmacies. Drummond began EPCS testing and certification in October 2012 and has since tested these EPCS [products](#). With its extensive test experience on the DEA's Controlled Substance Ordering System ([CSOS](#)) standard, and more than 700 electronic health records (EHR) software products (many of which contain e-prescribing functionality), it was a natural extension to move into EPCS.

ADDITIONAL CERTIFICATION SERVICES

- GS1 EPCIS DSCSA Track and Trace
- HITRUST
- CSOS (Controlled Substance Ordering Systems)
- ONC Health IT Services
- Penetration Testing
- PCI Compliance
- Secure Messaging (AS2, AS3, AS4, ebXML)
- GDSN Data pool



Phase 1 – Understand EPCS DEA Requirements

During this initial phase, your Drummond test proctor will provide a live comprehensive review of the DEA regulations and NIST Security guidelines. This phase is designed to make sure your technical staff has a thorough understanding of DEA EPCS and NIST Security Regulations. You will be provided EPCS test proctor sheets outlining the Interim Final Rule and assistance with understanding the regulations, how to implement them and how they will be tested during certification.

Phase 2 – Security Review

The DEA requires that EPCS applications address security to prevent insider threats and outsider attacks on any system. Careful review by an independent, qualified third-party of the "processing integrity" of any application is required to determine whether an application or application service provider has adequate protection against the range of potential security threats.

Drummond will confirm your security posture by reviewing any independent security assessments you have undergone and by having you complete the Drummond Security Survey.

Drummond offers security services such as vulnerability assessments, penetration testing and, risk assessments, and can assist in meeting the DEA requirement for processing integrity.

Phase 3 – Design Review/Implementation Tracker

In Phase 2, the Drummond implementation tracker guides you through the DEA EPCS regulations via a project management portal. The implementation tracker will allow you to track your progress in implementing the DEA requirements and upload questions/documents/screenshots for review. Your Drummond proctor will review the responses to determine any gaps in compliance and provide detailed feedback to keep you on track for certification.

Phase 4 – Pre-Certification Review

During Phase 3, a Drummond EPCS proctor will work with your company and evaluate your application once you have completed implementation. This will be done once you and your team are ready for testing to ensure nothing is missing. Drummond's EPCS test plan - based on the DEA EPCS regulations - will be used for the evaluation. This work will be done remotely. Clients find this extremely helpful to aid their understanding and execution of each of the DEA requirements to be prepared for a final review consisting of a Mini-Test and a Pre-Test.

The Mini-Test is a review of a partially completed EPCS solution at a time decided upon by your company. Typically, the Mini-Test occurs after 50 percent development has been completed. This review has proven useful for identifying gaps early in the development phase.

The Pre-Test is a dry-run review of a completed EPCS solution (candidate release solution only) by your EPCS proctor. Drummond will notify you of its findings via a Gap Report. The Gap Report will outline whether your product meets or does not meet each DEA IFR regulation, and provides detailed responses on each potential failure. The Gap Report will provide detailed information on what failed the pre-audit, why it failed and what needs to be done to correct the issue before advancing to the final test.

Phase 5 - EPCS Final Test

Drummond will conduct the final review against a production release version of an application enabled with EPCS in a staging environment. During this phase, the test resembles the test performed in Phase 3's Pre-Test. Additional tests to address compliance issues will be considered for a reduced test fee.

Upon successful completion of the EPCS Test of your product-with-version), Drummond will issue your company a Certification Report, Certification Seal and your product will be listed on the Drummond website. At this point, you may initiate communication with your customers that the test has been completed and it is their responsibility to review the certification report before use of your EPCS product. It is the prescriber or pharmacy's responsibility to ensure the application is compliant to EPCS regulations by reviewing the Certification Report.



ADDITIONAL IMPORTANT INFORMATION

DEA Approval of Drummond Group as a Third-Party Certification Organization

- Drummond’s certification process has been approved by the DEA and serves as a neutral third-party reviewer of EPCS applications.
- EPCS systems must undergo a rigorous test where Drummond carefully reviews and tests EPCS applications to provide assurance that the application fully meets all of the requirements of the DEA [Interim Final Rule](#) for [Electronic Prescriptions for Controlled Substances](#).
- Please consult with SureScripts for information on their specific testing for [EPCS](#).

TEST METHOD

The Test will be run remotely through Zoom screen-sharing.

CERTIFICATION SEAL

A certification seal will be issued with the Final Certification Report.
Usage of the certification seal must comply with Drummond’s Seal Usage Guidelines.



INITIAL TEST PRICING

Pricing is available upon request. Bundled discounts apply when purchasing additional Drummond services or certifying multiple applications.

RE-CERTIFICATION AND RE-TESTING

A review of your EPCS solution is required by the DEA every two years. In addition, if you change your software in areas that affect the EPCS criteria, you will be required to complete an EPCS Attestation form to provide information about the change (email: EPCS@drummondgroup.com for attestation form). An EPCS reviewer will then determine whether your product must be re-tested and provide any additional details. Drummond re-testing fees are kept low with our EPCS mini tests for change management during your two-year certification cycle.

REGISTER FOR TESTING

1. [REGISTER FOR TESTING](#)
2. After registration, you will receive an email with our Master Services Agreement, Statement of Work, Product Name form and payment instructions.
3. Upon completing the registration process, you will be introduced to an EPCS test proctor to set up an introductory call.

We look forward to working with you!

