



BUREAU OF NARCOTIC ENFORCEMENT  
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December 9, 2010

Re: **New Data Collection Vendor for California CURES' Prescription Monitoring**

Dear: Pharmacy/Dispensing Prescriber/Clinic or Software Vendor

This letter is to advise you and/or your vendor of changes to CURES in regards to:

- Prescription Data Submissions to CURES effective January 1, 2011.
- Why the change in vendor
- ASAP format change from ASAP 2005 to ASAP 2009
- Data Submission and Validation process
- Data Errors
- File Errors
- File Types and File Naming Conversation
- First Year Medical Resident Drug Enforcement Administration (DEA) Number Suffix; and
- Optional Data Fields
- Paper submission limitations
- Requests for CURES Data Deletion/Correction;
- Special Characters Appearing in the Data Fields.
- Zero fill

**Prescription Data Submissions to CURES Effective January 1, 2011**

The Department of Justice (DOJ) awarded the contract for the collection of controlled substance prescription data as defined in Health & Safety Code section 11165 to Atlantic Associates, Inc. (AAI) effective January 1, 2011.

With the DOJ's direction and approval, AAI is incorporating several new and essential features in their data collection process which will provide significant benefits to the Pharmacies, Physicians and the Bureau of Narcotic Enforcement (BNE). These changes will be implemented with the intention of improving the current data submission and enforcement process. I will also attempt to provide you with some clarity and direction.

The reason for the late notice regarding this change in vendors was due to the State of California budget impasse. Because there was no budget, the contract could not be awarded, the contract documents approved, or work started by AAI until the State of California had an approved and signed budget in place.

### **Why a Change of Vendor?**

The State of California adheres to a competitive bid process when awarding contracts for services that state employees/departments are unable fulfill. The current vendor, Infinite Solutions, Inc. (ISI) had the controlled substance prescription data collection contract for the past two years; however, as mentioned, due to the State of California's competitive bid process a new vendor was awarded this contract effective January 1, 2011. The competitive bid process is the right of all taxpayers. As such, the DOJ conducted a comprehensive, competitive, and fair evaluation in our selection of this vendor. Many of you may remember this vendor as the vendor DOJ utilized prior to ISI.

The new contract with AAI is effective for three years with an option to renew an additional two years.

### **ASAP 2009 Version 4.1 Data Format**

All controlled substance prescription data needs to be submitted in the American Society for Automation in Pharmacy (ASAP) standards, ASAP 2009 version 4.1 format. All pharmacies and dispensing Prescriber/Clinic must submit their controlled substance prescription data electronically in the ASAP 2009 version 4.1 format. **All other format submissions will be rejected.**

AAI will accept controlled substance prescription data in ASAP 2009 Version 4.1 format per the DOJ's mandate; however, until **July 1, 2011**, AAI will continue to accept controlled substance prescription data in ASAP 2005 Version 3.0 format

Like several agencies, the DOJ is moving towards electronic solutions and highly encourage the submission of controlled substance prescription data in electronic formats. Several ways of accepting electronic data has been/are being incorporated by the new vendor to facilitate the submission of electronic data. Further information regarding these processes will be forthcoming.

### **Data Submission and Validation process**

The DOJ has provided AAI with a set of requirements for validating the controlled substance prescription data submitted by individual pharmacies and dispensing prescriber/clinic. AAI will perform the validations and accept only files that meet the established criteria and reject files that do not meet this criteria. AAI will also be notifying pharmacies when controlled substance prescription data has been validated and accepted or rejected.

## Errors

The California Business and Professional (B&P) Code and California Health and Safety (H&S) Code 11165 (d) requires pharmacies and H&S Code 11190 requires dispensing prescriber/clinics to submit specific data such as name of patient, gender, date of birth, and prescription details, etc. The ASAP 2009 Version 4.1 format has many mandatory and optional data fields. Missing mandatory field data will create an error message during the validation process.

**Record Errors** identified during the validation process will result in the rejection of the erred records. When a Record Error notification is received by the pharmacy, AAI will ask the Pharmacy/Dispensing Prescriber/Clinic or Software Vendor to resubmit the original record with 02 (void) in DSP01 field and submit the corrected record with 01 (revise) in DSP01 field. This will overwrite the original record submitted. If the record was sent in error or the customer never picked up, it should be resubmitted with '02' (void) in the DSP01 field and the record will be removed. **This will only occur if the file was submitted in the ASAP 2009 Version 4.1 format.**

**File Errors** identified during the validation process will result in the rejection of the entire file. When a File Error notification is received by the pharmacy, the pharmacy will resubmit the entire file again with the corrected data.

## File Types and File Naming Convention

AAI will accept controlled substance prescription data in ASAP 2009 Version 4.1 format per the DOJ's mandate; however, until **July 1, 2011**, AAI will continue to accept controlled substance prescription data in ASAP 2005 Version 3.0 format. Data must be submitted in a .DAT or a .TXT format. Adhering to the file naming convention and the ASAP 2009 Version 4.1 format specification standards will eliminate most of the data rejection errors.

## Medical Resident DEA Number Suffix:

In order to capture all controlled substance prescriptions, as required by the California Health and Safety Code and the Business and Professionals Code, the following is being instituted as it relates to Medical Residents. When reporting prescriptions for residents, the institution's or supervising physician's (if outside the hospital environment) DEA number will be used along with a DEA number suffix assigned by the institution to the individual medical resident. The formatting of this process is as follows:

1. The Prescriber Information Segment, **PRE02**, is used to identify the institution's or supervising physician's (if outside the hospital environment) DEA number.
2. The Prescriber Information Segment, **PRE03**, will be used to enter the identifying suffix for the medical resident as assigned by the institution. This field will allow up to seven (7) characters to identify an individual medical resident.

### **Optional Fields**

In addition, the DOJ requests that optional data fields identified within ASAP continued to be submitted. The DOJ needs your assistance in reporting optional ASAP fields that are **mandatory in California**. The **mandatory** fields are: Pharmacy DEA number (**PHA03**), Pharmacy Name (**PHA 04**), pharmacy address information (Address1 **PHA05**, City **PHA07**, State **PHA08**, Zip Code **PHA09**, Phone Number **PHA10**), California Pharmacy License Number (which we require to be reported in Field **PHA11**), Patient State (**PAT15**), Gender Code (**PAT19**), and Payment Type (**DSP16**).

### **Paper Submission Limitations**

The California Business and Professions (B&P) Code section 1715.5 (b)(3) states impart that ...“For each pharmacy which submits hard copy pursuant to this subdivision and which pharmacy averages more than 25 triplicate prescriptions per month in any six months, the Board of Pharmacy or its designee may thereafter require that pharmacy to comply with subsections (b)(1) and (2).”

B&P Code section 1715.5 (b) states “The above information shall be provided in the following format:” (1) “For each pharmacy with the capacity to do so, by on-line transmission at least every 30 days and no later than the 18th calendar day of the month following the month in which the prescription is dispensed.” and (2) “For each pharmacy which does not have the capacity to transmit the information on-line, on a three and one-half inch diskette in a ASCII format or any other medium approved by the Board of Pharmacy, which diskette or medium shall be mailed or delivered to a location specified by The Board of Pharmacy, at least every 30 days and no later than the 18th calendar day of the month following the month in which the prescription is dispensed.”

The DOJ mandates all pharmacies to strictly meet the above statutes by submitting the data electronically. As stated in Health and Safety (H&S) Code section 11165, you must submit your data on a weekly basis. Several software vendors have tools and software that can automate your data submission processes. AAI will not accept paper submission of controlled substance prescription data that is in violation of the above statute.

### **Request for CURES Data Deletion/Correction**

As a result of controlled substance prescription data now available online to authorized users, more eyes are reviewing the data and identifying errors. While it has never been the Department of Justice (DOJ), Bureau of Narcotic Enforcement’s (BNE) posture to change, edit, or delete CURES records or files; to overlook these errors might be more damaging than to allow the correction. Therefore, within the American Society for Automation in Pharmacy (ASAP) standards, the following procedures are being instituted:

After a Pharmacy/Dispensing Prescriber/Clinic or Software Vendor submits a file, it discovers an error:

1. The Pharmacy/Dispensing Prescriber/Clinic or Software Vendor accesses and completes the Deletion/Correction Request form, adds a digital signature, and submits electronically to AAI. This form must be completely filled out with all pertinent information before the form will be evaluated and approved for processing.
2. Upon approval by BNE, AAI will ask the Pharmacy/Dispensing Prescriber/Clinic or Software Vendor to:
  - a.) Resubmit the original record with 02 (void) in DSP 01 field and include the reference number in AIR 10 field.
  - b.) If applicable (not a deletion only), the pharmacy/vendor submits the corrected record with 01 (revise) in DSP 01 field.

A copy of the Deletion/Correction Request will be sent to the California State Board of Pharmacy and/or Medical Board of California.

Please be aware that no records or data will be deleted or corrected within CURES without completion and BNE approval of the Request for Deletion/Correction of CURES Data form. The form is available on BNE's <http://ag.ca.gov/bnc/cures.php> Website or can be obtained thru AAI by emailing them at [data@aainh.com](mailto:data@aainh.com). This new process is effective **immediately!** The approximate turn around time for the data to be deleted/corrected is seven (7) days after BNE approval.

### **Resubmission of Corrected Data**

Accurate controlled substance prescription data is vital to prescribers monitoring their patient's health. Our goal is to help pharmacies submit controlled substance prescription data without problems or errors. When you are notified by AAI that errors have occurred during the submission of your controlled substance prescription data you are required to correct the data and re-submit it to AAI.

### **Special Characters in the Data Fields**

Please do not use pipes (|) or carets (^) in the **data fields**. Your file will be rejected if pipes (|) or carets (^) appear in the data fields.

### **Zero Fill**

Pharmacies are required to report zero fill data to AAI when there are no controlled substance data to report. This is a mandatory weekly reporting requirement and cannot be reported in advance.

**Vendor Notification**

If your pharmacy uses a third-party vendor to submit controlled substance prescription data to the DOJ, your company is responsible to notify its vendor of the upcoming transition.

The DOJ will continue to strive towards creating technological advances that will improve and ease the reporting of controlled substance prescription data. Once again, I thank you for your cooperation in meeting the needs of the CURES program.

**Pharmacy Email Notification/Verification of Processed Data and Rejects**

The current email notification database is not currently available from the current vendor, Infinite Solutions. To avoid any delays in file notifications, you need to send an email to AAI to request email notifications for any data submissions. Please include your email address, pharmacy license and DEA numbers, pharmacy name, contact name, and phone number. You must also include 'CA Email Notifications' in the subject line.

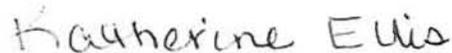
Should you have any questions please contact **AAI at (800) 539-3370 (office) or email them at [data@aainh.com](mailto:data@aainh.com)**. Their mailing address is:

Atlantic Associates, Inc  
8030 S. Willow St, Bldg #3  
Manchester, NH 03103.

You will be notified when AAI's website is available for data submissions and find updated information for controlled substance prescription data to the DOJ and the CURES program.

If you have any further questions or need additional information you can visit the Attorney General's website at [www.ag.ca.gov](http://www.ag.ca.gov) or you may contact the CURES Program at (916) 319-9062.

Sincerely,



KATHERINE ELLIS, Manager  
Bureau of Narcotic Enforcement

FOR EDMUND G. BROWN JR.  
Attorney General

cc: Board of Pharmacy  
California Medical Board