



March 23, 2009

Re: California's Prescription Monitoring Program (CURES)

Dear Pharmacist:

As most of you are aware the Department of Justice (DOJ) awarded their contract for the collection of controlled substance prescription data as defined in Health & Safety Code section 11165 to Infinite Solutions, Inc. (ISI). Since January 1, 2009, over seven thousand pharmacies have successfully submitted controlled substance prescription data to ISI. Thank you all for your support in transitioning to this new vendor. For those of you that have not yet registered with ISI, you must register immediately and begin submitting controlled substance prescription data in order to avoid non-compliance.

With the DOJ's direction and approval, ISI has incorporated several new and essential features in their data collection process which provides significant benefits to the Pharmacies, Physicians and the Bureau of Narcotic Enforcement (BNE). These changes have been implemented with the intention of improving the current data submission and enforcement process and they were also addressed on March 11, 2009, at the Board of Pharmacy Enforcement meeting in San Diego. I will also attempt to provide you with some clarity and direction.

Why a change of vendor?

The previous vendor, Atlantic Associates, Inc. (AAI) has collected controlled substance prescription data for California for the past 10 years; however, due to the State of California's competitive bid process a new vendor was awarded this contract on January 1, 2009. 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.

ASAP 2005 Data format

All controlled substance prescription data needs to be submitted in the ASAP 2005 version 3 format. The DOJ previously issued a communication on April 5, 2007 to pharmacies via an email from AAI. This communication clearly identified the acceptable ASAP format and ample implementation timelines for conversion. However, two years after this notification some pharmacies are still submitting files in various other formats. All pharmacies must submit their controlled substance prescription data electronically in the ASAP 2005 version 3 format and all other format submissions will be rejected.

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.

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 one-half inch nine track magnetic 1600 BPI tape or any other medium approved by the Board of Pharmacy, which diskette, tape 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 including ISI have tools and software that can automate your data submission processes. ISI will not accept paper submission of controlled substance prescription data that is in violation of the above statute.

File Types and File Naming Convention

ISI is only accepting controlled substance prescription data in an ASAP 2005 Version 3 format per the DOJ’s mandate. Data must be submitted in a .DAT or a .TXT format. Adhering to the file naming convention and the ASAP 2005 specification standards will eliminate most of the data rejection errors. These standards are listed on ISI website under CURES Process Frequently Ask Questions (FAQ’s) and CURES Data Correction FAQ’s. The URL for ISI website is www.4infinitesolutions.com/cures.

Data Submission and Validation process

The DOJ has provided ISI with a set of requirements for validating the controlled substance prescription data submitted by individual pharmacies. ISI performs the validations and accepts files that meet the established criteria and rejects files that do not. ISI will also be notifying pharmacies when controlled substance prescription data is received, and again when the information has been validated and accepted. We appreciate your patience during this transition as we finalize our validation criteria.

Data Errors

Errors identified during the validation process will result in the rejection of your entire file. We have implemented an interim solution that will accept correct data and reject only the erroneous data. When an error notification is received by the pharmacy the pharmacy will have two options for correcting the data. 1) resubmit the entire file again with the corrected data. 2) Only submit the corrected data, **as long as it is in the ASAP 2005 format**, i.e., headers, etc. This interim solution is functional. An optimal and permanent solution involves an online system that will allow pharmacies to correct the errors online. Data errors may be due to a multitude of reasons as outlined in the <http://4infinitesolutions.com/cures/ASAP2005/>. The permanent solution is anticipated to be functional July 1st 2009. Based on consultations with the Board of Pharmacy it was determined that pharmacies will have 14 days to correct and resubmit their data errors.

Special Characters in the ASAP 2005 file format

There are several special characters allowed as delimiters, spacers and line returns. Although different characters are permitted for the ASAP format, there are specific characters that are preferred by the DOJ. The specific characters are listed on the Infinite Solutions FAQs. Please reference the FAQs if you have any questions. In an effort to standardize incoming data and to minimize errors in the CURES database, the use of specific special characters in the data fields will be mandated by the DOJ as of July 1, 2009.

Data Warnings

The California B&P Code requires pharmacies to submit specific data such as name of patient, prescription details etc. The ASAP 2005 version 3 format has mandatory and optional data fields. Missing optional field data will create a warning not an error message during the validation process. At this time, the DOJ requests that pharmacies submit the data for these non mandatory fields voluntarily. The DOJ needs your assistance in reporting optional field information for the following fields: Address information from the pharmacy in the data submitted (Address 1, city, zip code) and PLN04 (method of payment).

Zero fill

Pharmacies are required to report zero fill data to ISI when there is no controlled substance data to report. This is a mandatory weekly reporting requirement and cannot be reported in advance. In an effort to assist the pharmacies with the zero fill reporting electronically, ISI has created a user friendly zero fill reporting online tool to assist you with reporting.

Resubmission of Corrected Data

Accurate controlled substance prescription data is vital to prescribers monitoring their patients health. Our goal is to help pharmacies submit controlled substance prescription data without having problems or errors. When you are notified by ISI that errors have occurred during the submission of your controlled substance prescription data you are required to correct the data and re-submit it within 14 days of notification from ISI.

March 23, 2009

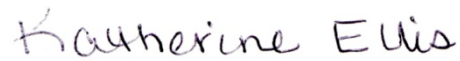
Page 4

The DOJ will continue to strive towards creating technological advances that will eventually improve and ease the reporting of controlled substance prescription data. Therefore, compliance is necessary by July 1, 2009. Once again, I thank you for your cooperation in meeting the needs of the CURES program.

Should you have any questions please contact **ISI at (916) 641-0500 (office) or (916) 679-5720 (CURES support) or email them at curessupport@4infinitesolutions.com**. Their mailing address is 5 Parkcenter Drive, Suite 110, Sacramento, California, 95825. You may also visit ISI's website at www.4infinitesolutions.com/cures where you can find updated information about the submission of controlled substance prescription data to the DOJ.

If you have any further questions or need additional information you can visit the Attorney General's website at 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

Jm

cc: Board of Pharmacy