

DEA EPCS Certification Letter

4/14/2015

Office Ally
1300 SE Cardinal Court Suite 190
Vancouver, WA 98683

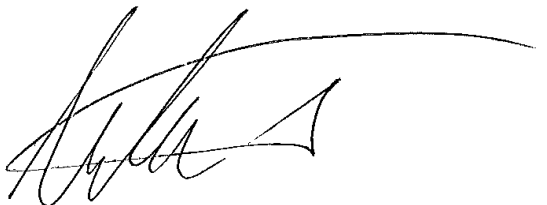
NetSPI performed a DEA-EPCS Certification Audit of the Office Ally Practice Mate v. 3.9.0 and Office Ally EHR 24/7 v. 3.9.0 application on April 14, 2015. NetSPI tested the application for compliance with the current DEA 21 CFR Part 1311 – Electronic Prescription of Controlled Substances (EPCS) Interim Final Rule (March 31, 2010). Our testing included onsite physical inspection of the hosting environment, onsite testing of the application's functionality, creating exceptions or failures and testing application's error handling capabilities, integrity testing of prescription and application log archives, documentation reviews, and interviews with subject-matter experts.

NetSPI determined that Office Ally meets the following requirements, and may be used for creating and electronically transmitting Schedule II, III, IV, and V controlled substance prescriptions:

- All required prescription information included in 21 C.F.R. 1306.05(a), appropriate digital signature or evidence the prescribing practitioner signed as required by 21 C.F.R. 1311.120(b) (17), and all required refill information included in 21 C.F.R. 1306.22 must be consistently and accurately recorded, stored, and transmitted.
- All other information required by 21 C.F.R. parts 1300 to 1321 must be consistently and accurately recorded, stored, and transmitted.

The following functionality has been excluded from the scope of the certification, and should not be used to issue or fill electronically controlled substance prescriptions:

- Support for Department of Veterans Affairs on a contractual basis pursuant to 38 U.S.C. 8153 and, the software should capture eligibility validation requirements under 38 U.S.C. 7401–7408.
- Support for institutional practitioners. The application was only tested for individual credentialing and provisioning workflows.
- Support for signing EPCS with individual private keys.
- iPhone and Mobile interfaces to the application are excluded.

A handwritten signature in black ink, appearing to be "Yan Kravchenko".

Yan Kravchenko, CISA (0646047), CISM (0606408), CISSP (51138)