New York’s I-STOP law

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Opioid Deaths by Medicaid Status

Source: New York State Department of Health

This law:

- Overhauled New York’s Prescription Monitoring Program;
- Required practitioners consult the PMP before prescribing;
- Required dispensing data be reported in “real time”;
- Required electronic prescribing; and
- Placed hydrocodone on C-II and tramadol on C-IV.
Practitioners must consider their patient’s information presented in the PMP Registry prior to prescribing or dispensing any controlled substance listed in Schedule II, III, or IV.

The data considered by the practitioner must be obtained from the PMP Registry no more than 24 hours before the prescription is issued.

Prescribers may utilize a designee to obtain the information for them, but may not designate the actual review of data.
PMP Registry Activity by Month

I-STOP's effective date

New PMP implemented

Source: New York State Department of Health
Rxs for Opioids and Selected Drugs

[Graph showing trends of prescriptions for various drugs]

Hydrocodone placed on C-II

Source: New York State Department of Health
Change in Prescribing Behavior

Comparison of opioid prescribing during the year prior to mandated PMP use and year post implementation:

- 8.72% decrease in total prescriptions;
- 10.4% decrease in patients w/ a prescription;
- 10.3% decrease in total quantity dispensed;
- Largest decreases in prescriptions were codeine 5 (-24%), hydrocodone (-17.7%) and codeine 3 (-14.3%);
- Increases in prescriptions for fentanyl (3.5%), morphine (2.2%) and oxycodone (0.2%).
Change in Prescribing Behavior

Hydrocodone
- 17.7% decrease in prescriptions;
- 16.3% decrease in patients with a prescription;
- 16.44% decrease in total doses dispensed.

Oxycodone
- 0.2% increase in prescriptions;
- 1.6% increase in patients with a prescription;
- 2.98% decrease in total doses dispensed.
Change in Prescribing Behavior

Buprenorphine prescribing:

- 11.3% increase in buprenorphine prescriptions;
- 10.9% increase in patients receiving a buprenorphine prescription.
PMP Data Submission

- Effective August 27, 2013, pharmacies are required to submit prescription data to BNE within 24 hours.
- The Department created a new data collection tool to accommodate increased reporting.
- The PMP Data Collection Tool allows for unattended reporting in a secure fashion.
- All reporting will be in ASAP 4.2 format starting on October 1, 2014.
Since August 13, 2013 BNE has received records indicating that 26,071,371 prescriptions for controlled substances have been dispensed in New York State.

A total of 33,495,803 records were submitted by pharmacies and other dispensers.

22% of all submitted records were initially excluded because they contained errors or were duplicative submissions.
PMP Data Submission

After receiving these records, BNE;

- Screens all records for critical errors;
- Rejects any record containing a critical error and notifies the submitter so it can be corrected;
- De-duplicates any identical records;
- Matches new record to existing patient records;
- Presents new record in PMP Registry.

This process takes about 2 hours from when BNE receives the original record.
Electronic Prescribing of Controlled Substances
Official Prescription Program

- Bureau of Narcotic Enforcement issues forge-proof official prescription forms to all registered practitioners and facilities within the State
- Contain a number of security features
- Serial numbers are unique and can be tracked
- From 2006-2013 issued ~1.4 B prescription forms
- At a cost of $78.7 M
Electronic Prescribing

- New York regulations allowed for electronic prescribing of controlled substances (EPCS) beginning on March 27, 2013.
- Electronic prescribing of controlled and non-controlled substances becomes mandatory for all practitioners as of March 27, 2015.
- Prescribers must use an application that has satisfied the DEA’s security requirements and register with New York State.
EPCS Exceptions

- Technological or electrical failure;
- Use of EPCS would impact the patient’s medical condition (up to 5 day supply);
- Issued by a practitioner to be dispensed outside of New York State;
- Veterinarians;
- Practitioners who have received a waiver from the Department of Health.
Practitioners may apply for a waiver from the requirement to electronically prescribe controlled substances.

Waivers will be granted upon a proper showing of economic hardship, technological limitations outside of the practitioner’s control or other exceptional circumstances.

By statute, waivers are good for one year, after which a practitioner may apply for a renewal.
Recent Legislation

In June 2014, Governor Andrew M. Cuomo signed into law a series of bills enacting further reforms. These laws:

- Allow for the expanded availability of naloxone;
- Require expanded coverage for addiction treatment services;
- Create increased penalties for practitioners and pharmacists who illegally dispense controlled substances.
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