Evaluation of Data Submitted to the Arkansas Prescription Drug Monitoring Program (PDMP)

Harold Rogers PDMP 2022 National Meeting BJA FY20 Harold Rogers PDMP Grant December 5-7, 2022

Dr. Laura Cima, PharmD
Prescription Drug Monitoring Program Administrator
Arkansas Department of Health



Goals for BJA FY 2020 Harold Rogers PDMP Grant

- 1. Increase ADH's authority to evaluate the controlled substance data reported to the AR PDMP.
- 2. Evaluate the controlled substance data reported by Arkansas dispensers to the AR PDMP.
- 3. Decrease the number of dispensers not in compliance with reporting frequency.
- 4. Decrease the number of upload errors in the PDMP data reported by dispensers.

Legislation Allowing the PDMP to Request Data from Dispensers

Act 62: Arkansas Code § 20-7-607(a)(2):

The department may: ... (ii) Require prescribers or dispensers, or both, to provide physical copies of written or electronic prescriptions upon request to validate data submitted to the program in order to evaluate the information reported by the program.

- 1) Packets containing information and a request for documentation faxed to pharmacy prior to evaluation
- 2) Pharmacy sends back copies of the 8 requested prescriptions and 2 prescriptions of their selection as directed by the fax packet
- Prescriptions from the pharmacy are evaluated against the data reported to the PDMP
- 4) The PDMP schedules a virtual visit with the pharmacy to discuss results
- 5) At the visit, the PDMP:
 - a. provides the results from the pharmacy's individual evaluation
 - b. discuss PDMP Best Practices (provide a Best Practice pamphlet)
- 6) Severe errors are followed up on (the pharmacy has 14 days to correct)



Arkansas Department of Health

4815 West Markham Street • Little Rodx, Arkansas 72205-3867 • Telephone (501) 661-2000 Governor Asa Hutchinson Rene e Mallory, RN, BSN, Interim Secretary of Health Jennifer Dillaha, MD, Director

ATTENTION: RESPONSE REQUIRED

Wednesday, June 22, 2022

«dispensary_name», «dispensary_dea_number»

«dispensary_address_one», «Dispensary_city», AR «Dispensary_postal_code»

Dear Pharmacist in Charge or Authorized Individual:

Pursuant to AR Code § 20-7-607 (2021), the Arkansas Prescription Drug Monitoring Program (PDMP) is conducting an evaluation of the controlled substance dispensation data reported to the PDMP by Arkansas pharmacies, in an effort to determine the accuracy of the data reported.

Accurate reporting is paramount as the PDMP is a tool used by health care professionals, law enforcement, and others to enhance patient care and to ensure legitimate prescribing and dispensing of controlled substances in health care.

Read the instructions below carefully to ensure compliance:

- See the attached "List of Requested Prescriptions" selected for review by the PDMP and fill out all requested fields
- · Please fax back to the AR PDMP the following:
 - o Provided cover letter;
 - o "List of Requested Prescriptions" attachment; and
 - Copies of original prescriptions requested (see attachment) AND their corresponding fill labels
 - Copies of another two original, Schedule II-V controlled substance prescriptions of your selection (filled between the last 7-14 days of this fax) AND their corresponding fill labels.
- Between the requested prescriptions and the two of your selection, there should be a total of ten prescriptions.
- If the option to fax is not available, please contact the PDMP at (501) 683-3960 for other options.
- . The requested documents must be provided to the PDMP within 10 business days of receipt of this letter.

After receiving the requested documents, we will contact your pharmacy to set up an in-store (or virtual) review of the evaluation findings and provide guidance concerning correcting any errors discovered during this evaluation.

Should you have any questions regarding this evaluation, please contact Dr. Laura Cima, PharmD, at the AR PDMP at: (501) 534-6278. Thank you for your understanding and cooperation.

Sincerely.

Hanrie Turpen, Pharm D

Jamie Turpin, PharmD,
PDMP Administrator
Prescription Drug Monitoring Program

- 1) Packets containing information and a request for documentation faxed to pharmacy prior to evaluation
- 2) Pharmacy sends back copies of the 8 requested prescriptions and 2 prescriptions of their selection as directed by the fax packet
- 3) Prescriptions from the pharmacy are evaluated against the data reported to the PDMP
- 4) The PDMP schedules a virtual visit with the pharmacy to discuss results
- 5) At the visit, the PDMP:
 - a. provides the results from the pharmacy's individual evaluation
 - b. discuss PDMP Best Practices (provide a Best Practice pamphlet)
- 6) Severe errors are followed up on (the pharmacy has 14 days to correct)

8 Requested Prescriptions

- Randomly pulled from the PDMP by our epidemiologist team
- Pulled within 18 months of Fax Packet being sent
- Includes
 - 4 opioid prescriptions
 - 2 stimulants
 - 2 sedatives

2 Prescriptions of Pharmacist's Selection

 Any scheduled II-V prescription dispensed between 1 and 2 weeks of Fax Packet being sent

- 1) Packets containing information and a request for documentation faxed to pharmacy prior to evaluation
- 2) Pharmacy sends back copies of the 8 requested prescriptions and 2 prescriptions of their selection as directed by the fax packet
- 3) Prescriptions from the pharmacy are evaluated against the data reported to the PDMP
- 4) The PDMP schedules a virtual visit with the pharmacy to discuss results
- 5) At the visit, the PDMP:
 - a. provides the results from the pharmacy's individual evaluation
 - b. discuss PDMP Best Practices (provide a Best Practice pamphlet)
- 6) Severe errors are followed up on (the pharmacy has 14 days to correct)

Minor Errors

- Missing/Incorrect/Misspelled Address of Patient
- Incorrect Day Supply

Intermediate Errors

- Incorrect Quantity Dispensed
- Incorrect Date Issued or Date Dispensed (Date Filled)
- Misspelled patient name

Severe Errors

- Wrong Patient
- Wrong Drug/Incorrect Dosage
 Form/Incorrect Strength/Inactive
 Rather Than Active Ingredient
 Reported for Compound
- Wrong/Missing/Dummy DEA
- Wrong Prescriber
- Prescription Not Reported to the PDMP (Noncompliance, Wrong File Format, Vendor Software Error)

- 1) Packets containing information and a request for documentation faxed to pharmacy prior to evaluation
- 2) Pharmacy sends back copies of the 8 requested prescriptions and 2 prescriptions of their selection as directed by the fax packet
- 3) Prescriptions from the pharmacy are evaluated against the data reported to the PDMP

4) The PDMP schedules a virtual visit with the pharmacy to discuss results

- 5) At the visit, the PDMP:
 - a. provides the results from the pharmacy's individual evaluation
 - b. discuss PDMP Best Practices (provide a Best Practice pamphlet)
- 6) Severe errors are followed up on (the pharmacy has 14 days to correct)

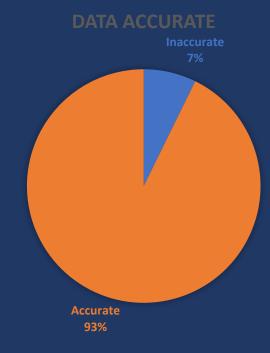
Virtual Visits

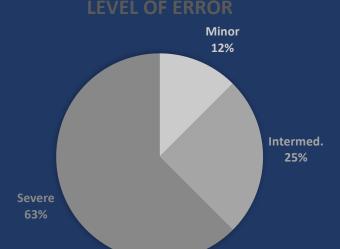
- Completed via ZOOM or TEAMS
- Complete within 10-15 minutes

- 1) Packets containing information and a request for documentation faxed to pharmacy prior to evaluation
- 2) Pharmacy sends back copies of the 8 requested prescriptions and 2 prescriptions of their selection as directed by the fax packet
- 3) Prescriptions from the pharmacy are evaluated against the data reported to the PDMP
- 4) The PDMP schedules a virtual visit with the pharmacy to discuss results

5) At the visit, the PDMP:

- a. provides the results from the pharmacy's individual evaluation
- b. discuss PDMP Best Practices (provide a Best Practice pamphlet)
- 6) Severe errors are followed up on (the pharmacy has 14 days to correct)





- 1) Packets containing information and a request for documentation faxed to pharmacy prior to evaluation
- 2) Pharmacy sends back copies of the 8 requested prescriptions and 2 prescriptions of their selection as directed by the fax packet
- 3) Prescriptions from the pharmacy are evaluated against the data reported to the PDMP
- 4) The PDMP schedules a virtual visit with the pharmacy to discuss results
- 5) At the visit, the PDMP:
 - a. provides the results from the pharmacy's individual evaluation

b. Discuss PDMP Best Practices (provide a Best Practice pamphlet)

6) Severe errors are followed up on (the pharmacy has 14 days to correct)





Best Practices for Reporting Prescription Drug Monitoring Program

What is the Arkansas Prescription Drug Monitoring Program?

The Arkansas Prescription Drug Monitoring Program (AR PDMP) is an electronic database of all the controlled substances dispensed at Arkansas pharmacies, mailorder pharmacies delivered into Arkansas, and other dispensaries such as a veterinary or medical clinics.

- 1) Packets containing information and a request for documentation faxed to pharmacy prior to evaluation
- 2) Pharmacy sends back copies of the 8 requested prescriptions and 2 prescriptions of their selection as directed by the fax packet
- 3) Prescriptions from the pharmacy are evaluated against the data reported to the PDMP
- 4) The PDMP schedules a virtual visit with the pharmacy to discuss results
- 5) At the visit, the PDMP:
 - a. provides the results from the pharmacy's individual evaluation
 - b. discuss PDMP Best Practices (provide a Best Practice pamphlet)
- 6) Severe errors are followed up on (the pharmacy has 14 days to correct)

Per the Rules Pertaining to Arkansas Prescription Drug Monitoring Program:

"Upon receiving notification of an error in data reporting, the dispenser shall take appropriate measures to correct the error and transmit the corrected data to the department or the department's contractor within 14 days of being notified of the error."

Timeline

November 2021: Send out communications (APhA, BOP)

December 2021: Send out communications to retail chains AND visit pilot locations

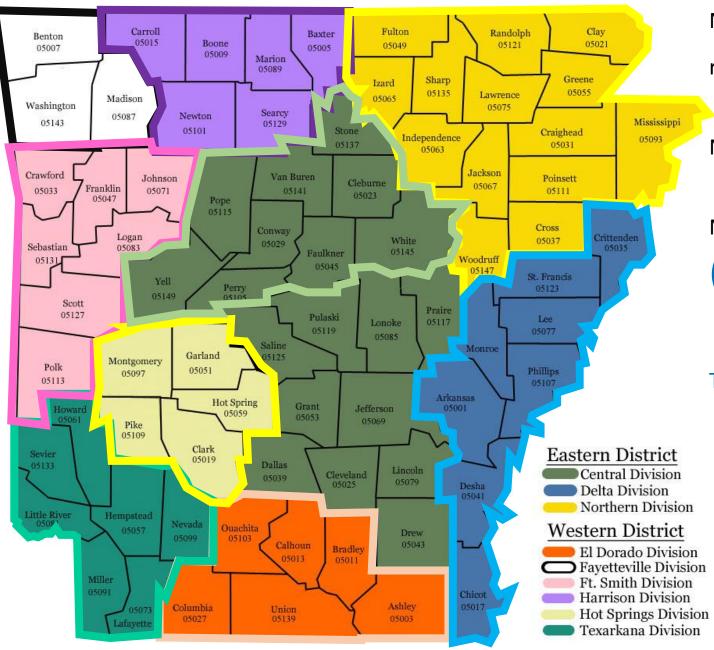
January 2022: Officially launch

January 2023: Provide preliminary state-wide results

May 2023: Wrap up evaluation

May 2023: Evaluate and analyze state-wide data. Provide final results.

As of 11/21/2022



Number of pharmacies documentation has been requested from: 504 (72%)

Number of pharmacies evaluated: 504 (72%)

Number of pharmacies fully completed: 487 (70%)

This project is 71.2% complete

As of 11/21/2022

Most common error identified:

• Minor: Missing/Incorrect/Misspelled Address of Patient

Out of 5,035 prescriptions evaluated so far (five were found not to have been reported) there have been:

- ZERO (0%) "Wrong Patient" errors identified
- FIVE (0.1%) "Wrong Drug" error identified
- SIXTY-THREE (1.25%) "Wrong/Dummy DEA" errors identified. Please note: the 63 listed here do not include instances where the correct prescriber was reported but the DEA was left off the face of the prescription (missing DEA)
- Of those 63, TWENTY-TWO (0.44%) "Wrong Prescriber" errors were identified

Out of 1008 prescriptions selected at random by the pharmacy, there have been:

• FIVE (0.5%) instances where a prescription wasn't reported

Of the severe errors REPORTED, 42% of them have come from chain pharmacies.

Of the prescriptions found to have not been reported, 80% of them of come from independently owned pharmacies

Next Steps

- Review Statewide Results
 - ASAP format thresholds
 - Resources/education to pharmacies/pharmacists
 - Reach out to Pharmacy Vendors on errors (i.e. Day supply)
- Development of an annual data quality checks
- Develop an evaluation of veterinary clinic submissions