Medical Marijuana Indicator used in the Arizona CSPMP

Samantha Hanson - Executive Assistant to PMP Director <u>samluttrell@azpharmacy.gov</u> 602-771-2742

When the Medical Marijuana Program started in AZ

- The Arizona Department of Health Services (DHS) Marijuana Program began in 2010 when Arizona voters passed Proposition 203, the initiative creating the Arizona Medical Marijuana Act
 - Allowed marijuana use for qualifying patients with a debilitating medical condition (defined in A.R.S. 36-2801)

- Recreational Marijuana legalized in 2020, but this did not eliminate the Medical Marijiuana Program in Arizona
 - > Arizona currently has over 100,000 medical marijuana patients

Who Regulates Marijuana in Arizona

- * The Bureau of Marijuana Licensing, part of the Arizona Department of Health Services is responsible for licensing and regulating marijuana (medical and recreational):
 - > Qualifying patients/caregivers
 - > Marijuana labs and testing facilities
 - > Medical and recreational dispensaries and their agents
 - > Marijuana dispensations
- * AZ CSPMP is housed under the Board of Pharmacy, separate from the Department of Health Services
 - Arizona State Board of Pharmacy has no regulatory authority regarding marijuana

Arizona CSPMP and Medical Marijuana

- ❖ 2011 HB 2585 was passed. This revised statute language and required the AZ CSPMP to identify patient's in Arizona who possess a Medical Marijuana card (A.R.S. 36-2602 (A)(3))
 - > This did not require the CSPMP to track Marijuana dispensations
 - > CSPMP only needs to identify those who possess medical marijuana card
- Department of Health Services adopted rules for qualifying patients and card issuing physicians
 - Physicians must attest to querying the patient's PMP profile before issuing medical marijuana certification (Admin code R-9-17-202)

How does AZ indicate a patient holds a medical card?

- ❖ The Arizona CSPMP is contracted with Bamboo Health
 - Contract language establishes the need for AZ CSPMP to identify marijuana card registrants.
- ❖ In the Rx Summary of the patient's CSPMP report, an indication of a medical card is listed
 - This is also viewable in CSPMP Gateway reports



Data Transfer from DHS to CSPMP vendor (Bamboo Health)

- ❖ Marijuana data is collected and maintained by Department of Health Services
 - Marijuana cardholder information is confidential
 - ➤ Not subject to disclosure to anyone other than DHS (ARS 36-2810)



- ❖ DHS posts a monthly file of patient names to SFTP site
 - ➤ If an <u>exact</u> match is found in the data file, the indicator will appear on the patient's report
 - ➤ If indicator currently exists and no match is found in new file upload, indicator falls off report
 - Cards are valid for 2 years or when a patient relinquishes the card

CSPMP Assists DHS in Verifying Prescriber Compliance

- ❖ Biannual compliance checks for prescribers who issue MMJ certifications
 - > DHS sends CSPMP a file of prescribers issuing mmj cards and how many cards issued within previous 6 months
 - CSPMP pulls audit trails and notates number of queries for each provider within that time frame
 - Total number of queries is compared to the total number of patients who received MMJ certificate for each prescriber
 - ➤ Prescribers identified with a query rate below 80% are referred to their respective licensing board by DHS

Challenges for CSPMP Administrators

- Medical marijuana cardholder information is confidential data is not visible to CSPMP or vendor
 - ➤ Challenges with verifying prescriber compliance
 - We can calculate the total number of patient queries for each prescriber, but can't confirm the queries were for patients receiving MMJ card
 - > CSPMP team can't inspect what we expect
 - Patient calls and states their card expired 3 months ago, but indicator still appears on their PMP report
 - Unable to open raw data file to confirm whether or not a patient should have an indicator
 - A medical card may expire before the next monthly upload
 - Collaborative effort between CSPMP/Bamboo Health/AZ DHS to verify monthly process is uploading correctly

Interagency Service Agreement with Department of Health Services

- ♦ 5 year ISA between DHS and AZ CSPMP
 - > Overall goal is to upkeep the CSPMP system to make it easy for prescribers to use
- Funding allows:
 - Upgrades and monthly maintenance to CSPMP system
 - > Assists with staffing needs
 - Helps fund PMP integrations