



Alliance of States with  
Prescription Monitoring Programs

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# A Guide for PMP Administrators on Practitioner Education

2011

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Schneider Institutes for Health Policy





## **INTRODUCTION**

Prescription drugs, when used under the direction and supervision of practitioners in the course of legitimate medical practice, bring relief and provide treatment to millions of patients. These same drugs, however, have been the source of the most serious public health crisis in recent times.

Today, prescription drug abuse is a national epidemic affecting millions of individuals, their families, and communities. Prescription drug abuse indicators continue to rise, including emergency rooms visits, deaths associated with prescription drug overdoses, and the rise in health care costs.

While some drugs are obtained through unlawful internet sales or stolen from medicine cabinets, a major source of abused and diverted prescription drugs is the health care system.

To combat this major public health crisis, forty-eight (48) states and one (1) U.S. Territory have passed Prescription Monitoring Program (PMP) legislation. A PMP is an effective tool for improving patient safety and curtailing the abuse and diversion of prescription drugs by enabling a state to monitor the prescribing and dispensing of controlled substances. By accessing this information before they prescribe or dispense, a practitioner can provide better patient care and help protect their practice. Published studies further suggest that, when PMP reports are utilized by practitioners (prescribers, dispensers and health care facilities) it reduces the quantity of drugs diverted to illicit markets and increases the quality of care rendered to patients. Therefore, it is imperative that practitioners access and utilize PMP information and make the review of PMP reports a routine part of their practice.

## **BACKGROUND**

The Alliance of States with Prescription Monitoring Programs (Alliance) in partnership with Brandeis University's Training and Technical Assistance Center and with support from the U.S. Bureau of Justice Assistance hosted a national meeting to discuss and create a PMP training or education curriculum for practitioners. The national meeting on "Practitioner Education on the Utilization of PMP Data" brought together participants from diverse disciplines and areas of expertise. The national meeting was held in St. Louis, MO on May 12-13, 2011 and included experts in the field of drug abuse, practicing physicians and pharmacists, federal agencies, and state



PMP administrators. The purpose of the meeting was to examine the issue of practitioners' access to and use of PMP reports and to develop a curriculum to assist PMP Administrators in their efforts to promote and increase PMP utilization.

The meeting resulted in the participants agreeing to the importance of educating practitioners about the value of PMP reports and establishing certain principles:

- PMPs present an opportunity for practitioners to have more information at their disposal before they prescribe or dispense medications.
- In order for prescribers and dispensers to appreciate the value and power of PMP reports, they need to understand how PMPs work and how PMPs may assist their efforts to curtail drug abuse and diversion while simultaneously enhancing the quality of patient care.
- PMP effectiveness can be increased through a higher utilization rate by practitioners.
- Practitioners are busy professionals. Therefore, it is important for the PMP to be easy to use and to provide meaningful data.
- PMP Administrators should work with the practitioner community and other appropriate stakeholders to encourage and promote access to and use of PMP reports.
- PMP education or training curriculum should include the following components:
  - ✓ Overview of the prescription drug problem
  - ✓ Overview of the state's prescription monitoring program
  - ✓ PMP key features for practitioners
  - ✓ Integration of PMP reports into a practitioner's practice
  - ✓ Legal issues regarding the access and use of PMP data



Along with suggestions on curriculum development, participants provided additional suggestions and ideas surrounding PMP training, including identifying methods for delivery of information to practitioners.

## **HOW TO USE THIS GUIDE**

The following guide includes ideas and recommendations made by the participants at the national meeting. The guide is intended to assist PMP Administrators in developing an education or training course in the use of and access to their state's PMP reports by practitioners.

The guide is divided into three major sections that PMP Administrators are encouraged to consider when developing a curriculum or training course for practitioners. The first section includes the components or topics which the experts believe need to be part of a PMP education or training program. The second section contains suggestions on various methods for delivering the information or training to practitioners. The third section contains general suggestions and ideas about educating or training practitioners.

Accompanying some of the topics are Power Point slide sets that PMP Administrators are permitted to utilize as part of a curriculum or training. The slide sets are available at the PMP Administrator Forum on the Alliance website: [www.pmpalliance.org](http://www.pmpalliance.org).



## Section 1. Curriculum Components

### 1. General Overview of the Prescription Drug Problem

#### A. National Data on the Prescription Drug Abuse Epidemic

Provide a national perspective on the problem, using available national data. Key resources include:

- The new Office of National Drug Control Policy's Prescription Drug Abuse Prevention Plan. This plan focuses on the prescription drug epidemic and highlights PMPs as a major strategy for addressing the problem.
- Centers for Disease Control regarding overdose deaths and hospitalizations:  
<http://www.cdc.gov/HomeandRecreationalSafety/pdf/poison-issue-brief.pdf>
- Data from the National Survey on Drug Use and Health. This annual survey is available from the Substance Abuse and Mental Health Services Administration:  
<http://oas.samhsa.gov/nsduh.htm>
- Additional national data can be found at the PMP Center for Excellence website: <http://www.pmpexcellence.org/drug-abuse-epidemic>

#### B. State Data on the Prescription Drug Abuse Epidemic

Provide specific state data that highlights the problem including:

- Number of overdose deaths from Medical Examiner's or Coroner's offices
- State hospital data to ascertain the number of hospitalizations, infants in withdrawal, and emergency room visits attributed to prescription drug overdoses
- State Substance Abuse Agency to obtain data on the number of treatment admissions associated with prescription drug abuse
- Federal ARCOS data to ascertain the number of purchases of controlled substances made by hospitals, practitioners and pharmacies in the state



- State and local crime data to determine number of investigations and/or arrests associated with prescription drugs. This is also a good source for street prices of these drugs

## **2. Overview of the Prescription Monitoring Program**

### **A. Description of the PMP**

- Provide a general description of PMPs nationwide
- Provide a basic description of the PMP
- Highlight the mission and goals of the PMP
- Describe security measures in place to protect patient information

### **B. Data Collection from Dispensers**

- Provide information on dispensers from whom the PMP collects data (i.e. in-state pharmacies, practitioners, federal facilities, mail order pharmacies)
- Discuss the controlled substance schedules (including drugs of concern) the PMP collects and provide information about the frequency of collection and data format
- Discuss the methods dispensers can use to provide or transmit data to the PMP
- Discuss data accuracy and limitations; including the error correction process

### **C. Authorized Users of the Data**

- Identify the various groups that are permitted to obtain PMP reports under state law (i.e. practitioners, regulatory boards, law enforcement agencies, patients, researchers, etc.)
- Identify the information each group is allowed to request and under what circumstances
- Describe the registration process each type of user must undertake to become authorized to request information
- Inform practitioners on what information is on a PMP report and how to read the report



## **E. Registering Practitioners with the PMP**

- Review the terms of the registration application or use agreement statements
- Provide information on security requirements; i.e. password format, changing passwords, securing their credentials for login, deactivating accounts, etc
- If applicable bring PMP registration applications to the training for distribution to practitioners

## **F. Delegate or Sub-accounts (if applicable)**

- Provide information about the value or impact that delegate or sub-accounts will have on the practitioner's practice. Highlight the fact that delegate accounts allow practitioners to obtain PMP reports without having to request the reports themselves
- Discuss how these accounts are created and maintained
- Discuss the responsibilities for ensuring that delegate accounts are being used appropriately (audit trails) and the need to deactivate an account promptly when a person is no longer employed by the practitioner

## **D. Unsolicited Reports/Notices (if applicable)**

- Provide an overview of any unsolicited reporting or notices that the PMP program sends out
- Discuss the benefits of being able to proactively address doctor shopping and other potentially harmful situations
- Discuss the criteria the PMP uses for its thresholds
- Discuss how these reports/notices are sent and how frequently they are produced
- Use PMP statistics to show how over time unsolicited reports can reduce the number of patients that exceed the thresholds over time



## **G. Future Enhancements**

- Provide information about any PMP program enhancements or future plans such as:
  - Educational campaigns for practitioners, law enforcement, regulatory boards or public
  - Interstate Data Sharing
  - Outcome Evaluation Studies
  - Unsolicited Reporting/Notifications
  - Connecting to your State's Health Information Exchange
  - Proposed new laws or regulations and how they may impact their practice

## **3. PMP Key Features for Practitioners**

### **A. Patient History Report**

Since this is the most common PMP report a practitioner will request, special focus should be taken to instruct and train practitioners on how to request and use this report.

- Discuss the accessibility to PMP reports; including request processing, system availability, internet requirements, mobile phone access, and the length of time for report delivery
- Provide a demonstration on how to login, request a report, and receive the results.
- Discuss the benefits of running a report on a new patient before their first appointment.
- Have a sample PMP report with fictitious data to display the data format and information on a report
- Describe additional report options; including sorting data, data export formats, etc.
- Discuss how the PMP report can be filed, stored or disposed in accordance with applicable state laws or rules



- Discuss how a practitioner, if allowed by law, can contact, share the report or data, and work with other prescribers and pharmacists listed on the report.
- Discuss how the report can be used in conjunction with treatment contracts.
- Discuss how the report can help identify potential substance abuse by a patient

## **B. Practitioner's Prescribing History Reports**

- If the PMP has the ability to generate such a report, discuss the importance of the report and how to access it.
- Have a sample report with fictitious data to display the data format and information on a report and how to interpret it.
- Discuss and demonstrate how this report can assist in identifying fraudulent prescriptions; i.e. cases of a stolen prescription pad.
- Explain how the practitioner can use this report as a periodic check to verify prescriptions filled by their patients.

## **4. Integrating PMP Reports into a Practitioner's Practice**

PMP Administrators may wish to identify ways for practitioners to integrate PMP reports into their daily procedures and practices to ensure the PMP is regularly accessed in a manner that does not interrupt the normal workflow of a practice. Additionally, it is vital for a practitioner to establish policies and procedures concerning PMP reports and patients with prescription drug abuse issues.

### **A. Setting Office Policies**

- Request a PMP report for new patients. By integrating PMP reports into the normal processing of accepting a new patient, the practitioner can enhance the medical assessment of a new patient's current drug use
- Obtain a PMP report as part of periodic review of patients who are regularly prescribed or dispensed controlled substances



- Request a monthly Practitioner History report to ensure no fraudulent prescriptions or errors have occurred and conduct a self audit of the practitioner controlled substance prescribing practice.
- Regularly use the PMP to monitor patients being treated with suboxone and for compliance with a patient/practitioner agreement.
- Develop a procedure for the care of patients who display drug seeking behavior
- Develop a procedure for assisting patients who have been identified as having a substance abuse problem
- Develop a procedure on how to respond if the PMP data seems to indicate a clear violation of state or federal laws
- Establish a policy to employ Screening, Brief Intervention, Referral, and Treatment (SBIRT) procedures

## **B. Training and Educating Practitioners' Staff**

- Provide training guides and encourage practitioners to educate their staff on proper use of the PMP including:
  - How the data can help identify medical issues
  - How to work with patients once medical issues are identified
- Recommend that the practitioner coordinate staff training with other practitioner groups to save time and resources.

## **C. Suggested Resources Practitioners Should Have Readily Available:**

- Listing of Pain Management Specialists
- Listing of Substance Abuse Treatment Facilities
- Listing of local Suboxone Practitioners
- Listing of Practitioner Consultants
- Standardized Treatment Contracts
- Assessment/Screening Tools for Pain and Substance Abuse
- Opioid Conversion Charts to establish a Morphine Equivalence



- Urine Analysis/Toxicology Screen
- Additional methods of treating pain that do not involve medications

## **5. Legal Issues Regarding Access and Use of PMP Data**

Practitioners face many legal requirements from a multitude of federal and state laws. It is important for the PMP training to include a section on the legal issues and responsibilities in the access and use of PMP data. A practitioner who understands their legal rights and requirements will better serve the needs of the patient.

A PMP Administrator should work with the medical community and appropriate legal counsel to identify these issues and develop the information so that it is clearly understood by practitioners.

### **A. Federal Law**

- Provide information on how the PMP complies with the Health Information Portability and Accountability Act (HIPAA). The National Alliance for Model State Drug Laws has resources available at: <http://www.namsdl.org/presdrug.htm>
- Provide information about 42 CFR Part II that covers the confidentiality of patients in a federally recognized substance abuse treatment facility. For assistance, refer to the Substance Abuse and Mental Health Services Administration (SAMHSA) at: [http://www.pmpalliance.org/pdf/pmp\\_memb\\_list\\_2011\\_b.pdf](http://www.pmpalliance.org/pdf/pmp_memb_list_2011_b.pdf)

### **B. State Law and Rule Authorizing the PMP**

- Provide information on the type and under what circumstances access is provided.
- Provide information on the legal ramifications with using or not using the PMP.
- Provide information on inappropriate access, use, or disclosure.



## **C. Other State Laws, Rules, and Guidelines**

- Provide information on any doctor shopping laws/rules or other unlawful acts by a patient.
- Provide information on the legal requirements for the prescribing, dispensing, and recordkeeping of controlled substances.
- Provide information on other laws/rules that may require a practitioner to access and/or use the PMP data. Work with health professional licensing entities, within your State, to ensure all relevant guidelines and standard of care requirements are covered.

## **Section 2. Delivery Methods**

It is important for PMP Administrators to be aware and have an understanding of the different avenues and resources available to effectively reach the practitioner community.

### **A. Written Forms of Education**

- Provide news or informational articles to licensing boards, Medicaid and other State agencies.
- Provide articles to medical and pharmacy organizations or associations to include in their publications or post on their websites.
- Develop flyers, brochures, and other written materials for print and online distribution.

### **B. In-Person Training and Presentations**

- Work with local and state associations representing practitioner groups to include PMP education or training at their regional or state meetings and/or request vendor space or a booth at events.
- Solicit hospitals, nursing homes and other health care facilities to participate in their grand rounds. These venues offer the opportunity to present to a large number of practitioners.
- Establish partnerships with medical, pharmacy, and nursing schools, and suggest presenting the education or training to their graduating classes. This will increase awareness and interest in using PMPs by newly licensed health care professionals. This can be particularly



important for those professionals going into residency programs where they may more frequently encounter patients engaged in drug seeking behavior.

- Work with health professional licensing boards and health professional associations to develop opportunities to present this information as part of their continuing education (CE) events. Since CEs are required by law and are necessary for license renewal, this may be a great opportunity to provide training to a large number of health care professionals. Also, because of the growing focus on prescription drug abuse and pain management, there may be opportunities for a PMP segment to be included.
- Partner with medical schools (schools of medicine or pharmacy) or other organizations that provide academic detailing. Academic detailing is a user friendly, educational outreach by trained clinicians. The clinicians make use of effective communication strategies through face-to-face visits that are brief, targeted and interactive. The clinicians will travel to the practitioner's office and provide training and information on relevant topics.

## **C. Internet and Communications Technology**

- Use web conferencing to reach professionals. It is cost effective and can be used to educate or train a large number of health care professionals. This may be worth considering as travel funds for states have been drastically reduced. Web conferencing also allows a live training demonstration of the PMP website. Use of conference calls is another inexpensive alternative to on-site training. The educational slides and materials may be emailed to participants prior to the training.
- Develop a comprehensive and user friendly PMP website. Make sure all of the resources a practitioner needs are available and easy to access.
- Create a PMP listserv to which interested practitioners can subscribe.
- Register accounts with Facebook, Twitter, and other social media.
- Web-based training is an effective and cost effective approach. Several PMPs have used vendors or are creating their own online courses to train practitioners. Some PMPs require the training to be taken before practitioners can register to use the system. This allows



busy practitioners to take the training when it best fits their schedule, at no cost. These training programs may include a demonstration of how to register and request PMP reports.

- Partner with organizations such as health professional associations or universities to create online continuing education credit (CE) courses. This provides a 'take it as you are able' approach with valuable CE needed for license renewal.
- Take advantage of video conferencing systems that could be used to remotely interact with and present the training to organizations that have similar technology.

## **Section 3. General Education and Training Considerations**

### **A. General Considerations**

- Most State agencies have a communications division or office that has expertise on how to effectively communicate with stakeholders, the press, and the public. The PMP Administrator should work with this group to develop an outreach plan specifically for the PMP. The experience and resources of the communication office can prove to be a valuable asset in developing an effective curriculum or training. The communication office can provide mechanisms to assist the PMP Administrators to deliver the education such as: newsletters, listservs, press releases, and more.
- The age range of practitioners spans at least 3 different generations and PMP Administrators need to ensure the curriculum or training is tailored to the needs of each of these generations.
- PMP Administrators should develop partnerships with public and private insurance payers. Not only can these groups disseminate information to practitioners, they may also be able to provide training opportunities.



## **B. Questions PMP Administrators should be prepared to answer**

- Can practitioners place the PMP report in the patient's medical record or file?
- Can practitioners share information from the report with the patient and provide them a copy?
- Can practitioners share information with other practitioners or pharmacies listed on the report?
- When is it appropriate to involve law enforcement?
- Can practitioners share information with health professional licensing entities?
- Can a practitioners share the information with private or public insurers?
- If a practitioner finds errors, how do they get corrected?
- Can practitioners be held legally responsible for not registering for access?
- Do practitioners have to request reports? If so, under what circumstances?
- Can practitioners be held legally responsible for not requesting a report?
- Can practitioners be held legally responsible for not using the report they received?
- Can practitioners be held legally responsible for using the report (i.e. a practitioner refused to provide a prescription or dispense the drug)?

## **C. Integration with Health Information Exchange / Electronic Health Records**

- If a practitioner has an electronic health record system, encourage the practitioner to explore ways to integrate with the State Health Information Exchange (HIE). At the present time, all PMPs are separate systems with their own login. Efforts have begun at both federal and state levels to integrate the PMP into the state Health Information Exchange (HIE). This will open up the opportunity for the EMR/EHR to allow for single sign on through the HIE to the PMP.



## **D. Integrating the PMP with Pharmacy Systems**

- Pharmacists should work with their employers and software providers to provide integrated access to the PMP from their pharmacy system (i.e. through a company's intranet). This allows the review of PMP information to be integrated into the workflow in dispensing a controlled substance prescription.

## **E. PMP Champion**

- Since practitioners relate well to peers, find practitioners who are avid users and supporters of the PMP and ask them to be 'champions' and invite them to the educational or training events.
- Request 'champions' to author articles on their use and experience with the PMP.

## **F. Additional Suggestions and Ideas**

- Develop a document containing referral resources to substance abuse treatment programs, pain management specialists, and other appropriate services. Frequently asked questions and legal issue resources should be included with this document.
- Work to gain support for the PMP from your health professional licensing agencies. These groups can promote the use of the PMP as a standard of care and may be willing to publish statements to that end. They may consider incorporating the use of the PMP into their rules, policies, or guidelines they produce. A similar process could work with large pharmacy chains or health care organizations. These groups may encourage use of the PMP by practitioners they employ.
- Seek funding and grants to hire a marketing firm to create an educational campaign for the PMP. Marketing experts can assist you with developing strategies and professional materials.
- Use PMP data to help target your educational efforts. For example, the PMP can identify high volume prescribers and dispensers to send information encouraging them to use the PMP. Also, consider using PMP data with the State's hospitalizations or treatment admissions data to target training in areas of the state having a greater potential for drug abuse or diversion.



# Alliance of States with Prescription Monitoring Programs

- Include PMP registration and educational information with unsolicited reports sent to practitioners. By proactively providing information on patients of concern, PMP Administrators can utilize this opportunity to inform practitioners who may not be familiar or actively using the PMP.
- Use the licensing process as another vehicle to deliver PMP information. Work with the health professional licensing entities to send PMP information out with renewal and first-time licensing applications. Also, consider integrating PMP registration renewals with licensing renewals and provide a consolidated service to practitioners.
- Research is another avenue by which a PMP Administrator may increase awareness of the PMP. With the current focus nationally on prescription drug abuse, interest among researchers to conduct studies on this problem is at an all-time high. PMP Administrator may partner with researchers to provide de-identified data for studies in the areas of prevention, treatment, and public health.

This document is funded through a grant (No. 2010-DG-BX-K088) from the Bureau of Justice Assistance, Office of Justice Programs, U.S. Department of Justice. Points of view or opinions in this document are those of the author and do not represent the official position or policies of the U.S. Department of Justice.