GOALS OF TRAINING

- Understand the following:
  - Why use the PMP
  - How to register
  - How to use the system
  - How to use the information
  - How to help your practice and patient
Drug Diversion is a medical and legal concept involving the transfer of any legally prescribed controlled substance from the individual for whom it was prescribed to another person for any illicit use.

As a prescriber and/or dispenser, you are required by the laws in the state of Oklahoma to guard against diversion.
Who is required to register (63 O.S. 2-302, 2-303, OAC 475: 10)

Every person who manufactures, distributes, dispenses, prescribes, administers or uses for scientific purposes any controlled dangerous substance

Practitioners shall be registered to dispense, prescribe, administer or use for scientific purposes substances in Schedules II through V if they are authorized to carry on their respective activities under the laws of this state.
What can cause denial, revocation, or suspension? (63 O.S. 2-304)

1. Has materially falsified any application filed

2. Has been found guilty of, entered a plea of guilty, or entered a plea of nolo contendere to a misdemeanor relating to any substance defined herein as a controlled dangerous substance or any felony under the laws of any state or the United States;

3. Has had his or her federal registration retired, suspended, or revoked by a competent federal authority and is no longer authorized by federal law to manufacture, distribute, dispense, prescribe, administer or use for scientific purposes controlled dangerous substances;

4. Has failed to maintain effective controls against the diversion of controlled dangerous substances to unauthorized persons or entities;

5. Has prescribed, dispensed or administered a controlled dangerous substance from schedules other than those specified in his or her state or federal registration;

6. Has had a restriction, suspension, revocation, limitation, condition, or probation placed on his or her professional license or certificate or practice as a result of a proceeding pursuant to the general statutes;

7. Is abusing or, within the past five (5) years, has abused or excessively used drugs or controlled dangerous substances;

8. Has prescribed, sold, administered, or ordered any controlled substance for an immediate family member, himself or herself; provided that this shall not apply to a medical emergency when no other doctor is available to respond to the emergency;

9. Has possessed, used, prescribed, dispensed or administered drugs or controlled dangerous substances for other than legitimate medical or scientific purposes or for purposes outside the normal course of his or her professional practice;

10. Has been under the influence of alcohol or another intoxicating substance which adversely affected the central nervous system, vision, hearing or other sensory or motor functioning to such degree the person was impaired during the performance of his or her job; or

11. Has violated any federal law relating to any controlled substances, any provision of the Uniform Controlled Dangerous Substances Act, or any rules of the Oklahoma State Bureau of Narcotics and Dangerous Drugs Control.
Title 63 O.S. 309I
(SB 1446)

- 7 day pill limit applies to acute pain
- Initial prescription
  - has never previously been issued a prescription for the drug or its pharmaceutical equivalent in the past year, or
  - requires a prescription for the drug or its pharmaceutical equivalent due to a surgical procedure or acute pain and has previously had a prescription for the drug or its pharmaceutical equivalent in the past year
  - not to exceed 7 day supply
  - requires documenting medical history, physical exam, treatment plan, PMP check, patient-provider agreement (is applicable)

- Subsequent prescription
  - no less than 7 days after issuing initial prescription
  - requires consultation before issuing
  - not to exceed 7 day supply
  - document rationale and no undue risk of abuse, addiction, or diversion exists
After issuing an initial prescription pursuant to Section 2-309l of Title 63, an individual practitioner may issue one (1) subsequent prescription for an immediate-release opioid drug in Schedule II in a quantity not to exceed seven (7) days if:

(A) The subsequent prescription is due to a major surgical procedure and/or "confined to home" status as defined in 42 U.S.C. 1395n(a);

(B) The practitioner provides the subsequent prescription on the same day as the initial prescription;

(C) The practitioner provides written instruction on the subsequent prescription indicating the earliest date on which the prescription may be filled (i.e. "do not fill until" date); and

(D) The subsequent prescription is dispensed no more than five (5) days after the "do not fill until" date indicated on the prescription.
Third prescription

- Discuss risks associated with drugs being prescribed
  - risk of addiction and overdose associated with opioid drugs and taking them with alcohol, benzos, and other central nervous system depressants
  - why the prescription is necessary
  - alternative treatments

- Enter into pain-management agreement with patient

- After 3 months of continuous use
  - review course of treatment (at a minimum every 3 months)
  - assess patient prior to renewal
  - make reasonable effort to stop, decrease dosage, or try other treatment
  - check PMP
  - monitor compliance with pain-management agreement
Providers must have written policies and execute informed consent agreements if they have a
- Patient requiring 3 or more months opioid treatment
- Patient with opioid/benzo combo
- Patient with MME over 100
January 1, 2020

Electronic Prescribing Controlled Substances

- No controlled dangerous substance included in Schedule II, which is a prescription drug as determined under regulation promulgated by the Board of Pharmacy, shall be dispensed without an electronic prescription of a practitioner.

- Electronic prescribing shall be utilized for Schedules II, III, IV, and V, subject to the requirements set forth in 21 CFR, Section 1311 et seq.

- The electronic prescription requirement provided for in this section shall not apply to prescriptions for controlled dangerous substances issued by any of the following:
  - A practitioner that has received a waiver or extension from his or her licensing board.

- All prescriptions issued pursuant to paragraphs 5 and 6 (exemptions from e-prescribing) of this subsection shall be issued on an official prescription form provided by the Oklahoma State Bureau of Narcotics and Dangerous Drugs Control.
Mandatory Checks

Minimum Standard

Mandatory Checks for Opioids, Benzodiazepines, and Carisoprodol

Before issuing an initial prescription for opioids
Every 180 days
HISTORY OF OKLAHOMA’S PMP

1990-2006 O-Star, reporting only Schedule II’s, must report every 30 days.

2006 -2010 Schedules II-V’s, required to report within 30 days.

April 2010 Schedules II-V must report within 24 hours of dispensing, everything must be submitted electronically.

January 2012 pharmacies are required to report in Real Time (within 5 mins.)

November 1, 2015 - Prescriber requirement to check the PMP prior to writing prescriptions for an opiate, benzodiazepine and/or carisoprodol

August 30th 2016, switch to the Appriss PMP AWARxE system.
GOAL OF OKLAHOMA’S PMP

- Work in partnership with
  - pharmacies,
  - practitioners,
  - law enforcement,
  - licensing boards and
  - other health care professionals

- To reduce and prevent
  - prescription fraud,
  - substance abuse,
  - "doctor shopping",
  - and other illegal activity related to pharmaceutical drug diversion.
Proper Use of PMP

- Prescriber has to have his/her own unique account
- No shared office accounts
- Prescriber can have delegates check the PMP
  - Delegate must have the supervisor listed on account
  - Delegate must choose appropriate supervisor for patient search
- Must not share username and password with anyone
- Unauthorized disclosure is a misdemeanor
- Prescribers need to check “My Rx” regularly to ensure there are no prescriptions on their DEA that should not be there
PMP Upgrades Coming Soon

- **Prescriber Report**
  - Report will provide a view of the total prescribing activity for the prescriber

- **Delegate Review**
  - Every 6 months
    - Supervisor must accept or reject delegates
    - Supervisor will be able to add delegates
    - This will ensure only authorized personnel have access to the PMP
  - This will protect the prescribers information
  - This will protect the prescriber from unauthorized disclosers occurring
Title 63 O.S. 2-105 (B)

“All registrants, as defined in the Anti-Drug Diversion Act, shall report any person appearing at a medical facility with a drug overdose to the central repository as provided in the Anti-Drug Diversion Act.”

https://portal.obn.ok.gov/overdose/
ACCESSING THE PMP

- [https://oklahoma.pmpaware.net](https://oklahoma.pmpaware.net) (this will take you directly to the log in and create an account screen)
- [www.ok.gov/obndd](http://www.ok.gov/obndd) (“PMP Login” will be found in the lower right corner of the screen) - this page contains a lot of important information that is accessible by clicking on the ‘PMP Program” button located on the left side of the screen
PMP AWARxE SYSTEM SECURITY-
WHAT YOU NEED TO KNOW

- PASSWORD WILL EXPIRE YEARLY
- SYSTEM WILL AUTOMATICALLY TIME OUT AFTER 20 MINUTES OF INACTIVITY
- DELEGATES MUST APPLY FOR INDIVIDUAL ACCESS
- PRIMARY ACCOUNT HOLDERS ARE RESPONSIBLE FOR THEIR DELEGATES.
REGISTERING FOR THE PMP-
PRIMARY ACCOUNT HOLDER
START WITH “CREATE AN ACCOUNT”

Register for an Account

Please create your own account and do not create an account on behalf of someone else.

Email

Password

Password Confirmation

Password Must:
- Minimum of 8 characters
- Contain one upper case letter
- Contain one lower case letter
- Contain one special character (! @ # $ etc.)
- Maximum of 72 characters

CLICK “CONTINUE”

ENTER YOUR EMAIL ADDRESS - YOU CANNOT SHARE ACCOUNTS

CREATE A PASSWORD - MINIMUM OF 8 CHARACTERS, ONE MUST BE CAPITALIZED AND YOU MUST USE A SPECIAL CHARACTER
EXAMPLE: Temporary#9

CLICK “CONTINUE”
SELECT YOUR ROLE

Registration Process

Select your User Roles

- Healthcare Professional
- Agency Administration
- Law Enforcement
- Other

Click “Save and Continue”
THE APPLICATION FOR A PRESCRIBER

YOU WILL NEED TO ENTER YOUR DEA# AND OBND DD CONTROLLED SUBSTANCE NUMBER
SUBMIT YOUR REGISTRATION

PMP ADMINISTRATION WILL APPROVE YOUR ACCOUNT WITHIN 3 BUSINESS DAYS OR LESS

CHECK YOUR EMAIL ACCOUNT FOR A MESSAGE FROM A “NO REPLY” SENDER TO VERIFY YOUR EMAIL.
DELEGATE REGISTRATION

- Follow the same process as prescriber registration. Except choose “prescriber delegate licensed or unlicensed”
- Delegate will include each prescribers DEA# and complete the field “I am a delegate for” with the prescribers email address
- Prescribers (primary account holder) will approve each delegate
REPORT OPTIONS

**Patient Request:**
By entering the patient first name, last name and date of birth, you will see their controlled drug prescription history. Information is entered by pharmacy or other dispensing physician offices. If you do not get a return on just the name and date of birth, try adding the zip code to the search.

**Requests History:**
Allows you to view all the patient reports you and your delegates have requested.

**My RX:**
This is your prescribing history. Your delegates do not have authorization to run this report.
This report allows you to see all the patients that have been prescribed controlled drugs under your DEA.
I HAVE PULLED THE PATIENT REPORT, NOW WHAT?

First, document that you have checked the PMP in the patient file.

If you see something in the report that looks suspicious, for example,

- multiple opioids,
- benzodiazepine or
- even carisoprodol prescriptions,
  - which may overlap in fill dates,
- maybe have multiple prescribers and or pharmacies,
  - this could be interpreted as a someone who is doctor shopping, diverting or trying to obtain medication through deceptive measures.
  - Make a report to the Oklahoma Bureau of Narcotics and ask to speak to a Diversion Agent at 405-521-2885.
The most important thing to remember...

Oklahoma State Statute Title 63 Chapter 2 article 3, section 2-309D paragraph G:
“The duty to access and check shall not alter or otherwise amend appropriate medical standards of care”
Treat your patient.
As a dispensing physicians office, you will be able to enter your controlled drugs through the PMP AWARxE site.

This will be done through the “Menu” button found on your dashboard. Click on “RX Management” then “New RX”
Since this form is used in Veterinary medicine, they have an option to mark if it is an animal script and add the animal name.
MANUAL ENTRY DATA

- Upon submittal of the manual entry form, data should appear within 5 minutes of reporting on the patient PMP report.

- The system will not allow you to upload the data if there are any errors (incorrect NDC codes or missing required fields).

- Typographical errors (misspelling of a name or address) will not stop the submittal. However, these errors can be corrected through the error correction button.
# Top 5 Prescribed Drugs (# of Prescriptions)

<table>
<thead>
<tr>
<th>Prescription Drug</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydrocodone</td>
<td>2,916,208</td>
<td>2,624,911</td>
<td>2,231,711</td>
<td>2,048,734</td>
<td>1,907,347</td>
<td>1,666,921</td>
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<tr>
<td>Oxycodone</td>
<td>717,484</td>
<td>783,166</td>
<td>888,028</td>
<td>899,290</td>
<td>874,692</td>
<td>788,417</td>
</tr>
<tr>
<td>Alprazolam</td>
<td>823,594</td>
<td>816,273</td>
<td>819,863</td>
<td>782,353</td>
<td>728,284</td>
<td>628,893</td>
</tr>
<tr>
<td>Tramadol</td>
<td>735,054</td>
<td>753,672</td>
<td>807,675</td>
<td>811,103</td>
<td>776,373</td>
<td>710,712</td>
</tr>
<tr>
<td>Zolpidem</td>
<td>649,009</td>
<td>631,275</td>
<td>608,725</td>
<td>578,768</td>
<td>543,801</td>
<td>495,841</td>
</tr>
</tbody>
</table>
STATE OF OKLAHOMA
DRUG OVERDOSE DEATH
10 YEAR COMPARISON

OBN
L Baker
3/21/2017
Source: State ME
2018 Data is not complete.
STATE OF OKLAHOMA
DRUG OVERDOSE DEATHS

<table>
<thead>
<tr>
<th>Year</th>
<th>Pharmaceutical</th>
<th>Illicit Drugs</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>634</td>
<td>165</td>
</tr>
<tr>
<td>2015</td>
<td>599</td>
<td>236</td>
</tr>
<tr>
<td>2016</td>
<td>591</td>
<td>308</td>
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<tr>
<td>2017</td>
<td>437</td>
<td>359</td>
</tr>
<tr>
<td>2018*</td>
<td>272</td>
<td>310</td>
</tr>
</tbody>
</table>

SOURCE: STATE M.E. Office
2018 Data not complete
STATE OF OKLAHOMA
2016 DRUG OVERDOSE DEATHS
INVOLVING THE TOP 9 ABUSED DRUGS

The majority of all drug overdose deaths are due to a combination “cocktail” of drugs rather than one specific drug. This chart reflects the total number of deaths each drug was involved in, even though another drug may have been the primary cause of death.
FAQ

What if I want to prescreen a potential new employee before I hire them?
Not allowed. That is considered misuse of the PMP and could cause you to lose your access. The PMP can be used to prescreen potential new patients. Providers must have established a physician/patient relationship prior to checking the PMP. Scheduling an appointment is considered establishing a physician/patient relationship.

I do not have time to use the PMP; do I still have to register?
As long as you are not writing a prescription for opiates, synthetic opiates, semi-synthetic opiates, benzodiazepine, or carisoprodol, then you are not required to register.

What if I stopped dispensing medication from my office so I would not have to do this?
Dispensing and writing prescriptions are two different activities. If you dispense from your office, you have to report Schedule II-V drugs to the PMP. If you have stopped dispensing, then you are probably writing the prescription and handing it to the patient to have it filled at a pharmacy. You are still required to check that patient in the PMP.
FAQ

WHAT IF I ONLY SEE THE PATIENT ONE TIME AS A COURTESY BECAUSE HIS/HER PHYSICIAN WAS NOT AVAILABLE?

This patient is new to you. If you make the medical decision to write a prescription for one of the medications listed in the law (63 O.S. 2-309D), it is still your responsibility to check the PMP.

DO I NEED TO CHECK THE PMP WHEN DISCHARGING A PATIENT FROM THE HOSPITAL OR EMERGENCY ROOM?

If you are writing a prescription for opiates, synthetic opiates, semi-synthetic opiates, benzodiazepine, or carisoprodol at discharge from either event, you still need to check the PMP if it has been at least 180 days since you checked that patient.

IF I ONLY WRITE A COUPLE SCRIPTS PER YEAR, DO THE MANDATORY CHECKS APPLY TO ME?

By Oklahoma law (63 O.S. 2-309D), it is mandatory that providers check the PMP prior to prescribing and every 180 days prior to authorizing refills for opiates, synthetic opiates, semi-synthetic opiates, benzodiazepine, or carisoprodol (exclusions for hospice or end-of-life, or patients residing in nursing facility). This applies whether you write one or several thousand scripts per year.
FAQ

**CAN I ALLOW AN OFFICE STAFF TO PERFORM THE PATIENT SEARCH?**

Physicians may designate a staff member to run the patient PMP on the physician’s behalf. This designated staff member must have their own PMP AWARxE account and have the physician listed as their supervisor.

**AS A PRESCRIBER, HOW OFTEN DO I NEED TO CHECK THE PMP?**

You are required to check new patients or after 180 days elapsed since PMP check for the patient prior to prescribing one of the following: opiates, synthetic opiates, semi-synthetic opiates, benzodiazepine, or carisoprodol (exclusions for Hospice or end-of-life, or patients residing in nursing facility)

**CAN MY OFFICE/FACILITY HAVE ONE USERNAME AND PASSWORD?**

No. Everyone must have their own unique username and password.
QUESTIONS OR COMMENTS?

**CONTACT INFORMATION:**
- Devone Turner
- Oklahoma Bureau of Narcotics PMP Educator
- (405) 530-3772
- dvturner@obn.state.ok.us

**PMP Help Desk Numbers:**
- Technical Support: 1-855-965-4767
- Administrative Support: 1-877-627-2674
REFERENCES

- Oklahoma Administrative Code 475 [www.oar.state.ok.us](http://www.oar.state.ok.us)
- Oklahoma Title 63 [www.oscn.net](http://www.oscn.net)
- Oklahoma Bureau of Narcotics and Dangerous Drug Control [www.ok.gov/obndd](http://www.ok.gov/obndd)