

THE ABC'S OF THE PDMP

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Objectives

- Explain the prescriber requirements under the PDMP law, including exceptions to these requirements.
- Distinguish between mandatory querying and discretionary querying under the PDMP law.
- Apply the various prescribing laws to real-life fact patterns.
- Examine pitfalls to avoid.

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What We Will Cover

- Acts 191-2014, 124-2016, & 79-2017
 - Original PDMP law and amendments
- Act 122-2016
 - Prescribing limits in various facilities
- Act 125-2016
 - Prescribing limits for minors
- Act 16-2016
 - PDMP querying under the Medical Marijuana Act

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Acts 191, 124, & 79

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PDMP Registration

- As of January 1, 2017, all licensed prescribers who are lawfully authorized to distribute, dispense, or administer a controlled substance in the Commonwealth of Pennsylvania are required to register with the program. (Act 124)
 - Does not matter if you don't prescribe controlled substances
 - Does not matter if you never have to query the PDMP
 - Includes out-of-state prescribers licensed in Pennsylvania
 - Includes active-retired licensees
- Prescribers who fail to register are subject to sanctions from the Department of Health and the applicable state licensing board.

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Prescriber Requirements (Acts 191 & 124)

Prescribers shall query the PDMP system:

- For each patient, the first time the patient is prescribed a controlled substance by the prescriber for purposes of establishing a baseline and a thorough medical record
- If a prescriber believes or has reason to believe, using sound clinical judgment, that a patient may be abusing or diverting drugs
- Each time a patient is prescribed an opioid drug product or benzodiazepine by the prescriber
- Prior to certifying a patient for medical marijuana
(Note: Part of Medical Marijuana Act, Act 16-2016)

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Discretionary Queries (Act 191)

- An existing patient
- Prescriptions written using the prescriber's own DEA number

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Are there exceptions? (Acts 124 & 79)

- Patients admitted to a licensed health care facility or in observation status in a licensed health care facility
 - Initial query required
 - Subsequent queries not required so long as patient remains admitted to the licensed health care facility or remains in observation status in a licensed health care facility
- Patients prescribed a non-narcotic Schedule V controlled substance for the treatment of epilepsy or a seizure disorder (Act 79)

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Delegates

- "A person employed or supervised by a prescriber or pharmacist who granted them access to query the PA PDMP system on their behalf. Delegates are not required by law to be licensed health care professionals."
- Preference must be given to a professional nurse licensed by the State Board of Nursing.

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What Do I Do With the Information?

- Information obtained from the PDMP system must be entered into patient's medical record:
 - If the individual is a new patient
 - or
 - If the prescriber determines a drug should not be prescribed or furnished to a patient based upon the information obtained from the PDMP system

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Act 122 – Rx Limits in Certain Facilities

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Application

- Three areas Act 122 applies to regarding patient care:
 - Emergency departments
 - Urgent care centers
 - Observation status in hospitals

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Opioid Prescribing Limits

- Quantity sufficient to treat a patient for no more than seven days (with exceptions)
- Refills not permitted (no exceptions)

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Exceptions

- Professional judgment of the health care practitioner; or
- Treatment must be for one of the following:
 - Pain associated with a cancer diagnosis
 - Palliative care

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Exceptions - Recordkeeping

- The condition that triggered the practitioner to prescribe the opioid for more than seven days; and
- An indication that a non-opioid alternative was not appropriate to treat the medical condition

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Act 122 – PDMP Requirements

- Emergency Departments
 - Querying not required for any medication provided to a patient in the course of treatment in the ED
 - Exception does not apply to prescriptions issued to patient upon discharge from the ED
- Urgent Care Centers & Observation Status
 - No querying exceptions

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Act 125 – Rx Limits for Minors

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Act 125 – PDMP Requirements

- Must query PDMP prior to first prescription of a controlled substance unless an exception applies (e.g. ED treatment or inpatient in a health care facility after first query)

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Act 125 - Limits

- **Parent/Guardian**
 - No more than a seven-day supply
 - Must sign form authorizing the prescribing of an opioid
- **Authorized Adult**
 - "An adult who has a valid health care proxy to consent to the minor's medical treatment"
 - No more than a 72-hour supply
 - Must sign form authorizing the prescribing of an opioid
 - Prescriber required to indicate on the prescription the quantity that is to be dispensed pursuant to that prescription

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CONSENT TO PRESCRIBE OPIOID MEDICATION TO A MINOR

PRESCRIBER (Name, Address, Phone, Fax, Email, and State License No.) _____

PATIENT (Name, Address, Phone, Fax, Email, and State License No.) _____

DATE _____

TIME _____

LOCATION _____

REASON FOR VISIT _____

PRESCRIBER'S ASSESSMENT (Type of pain, severity, duration, and any other relevant information) _____

PRESCRIBER'S PLAN (Type of medication, dosage, and duration) _____

PRESCRIBER'S SIGNATURE _____

PATIENT'S SIGNATURE _____

WITNESS'S SIGNATURE _____

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Act 125 - Exceptions

- Medical emergency documented in minor's medical record; or
- Prescriber's professional judgment that more than a seven-day supply is needed
 - Must document in minor's medical record the factors which led to deviation

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QUIZ TIME!!!

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Dr. Jones prescribed a non-opioid analgesic controlled substance to Patient A and performed a PDMP query as required. On a follow-up visit, Patient A indicated that she is having bad side effects. Dr. Jones is now going to prescribe a different non-opioid analgesic controlled substance.

Must Dr. Jones query the PDMP again?

Yes, since this is the first time Dr. Jones will be prescribing this new controlled substance to Patient A. (Act 191)

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Dr. Miller prescribed Xanax® to Patient B and performed a PDMP query as required. Dr. Miller is now going to write a refill for the same prescription for Patient B.

Must Dr. Miller query the PDMP again?

Yes. As Xanax® falls under the section of the PDMP law for opioids and benzodiazepines, Dr. Miller is required to query the PDMP each time before issuing a prescription for any opioid or benzodiazepine, even if it is a refill for the same dosage and controlled substance. (Act 124)

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Dr. Phillips prescribed a non-opioid analgesic medication to Patient C and performed a PDMP query as required. On a follow-up visit, Dr. Phillips adjusts the dosage amount and writes a new prescription for the same non-opioid analgesic medication.

Must Dr. Phillips query the PDMP again?

No. Querying is not required when prescribing a dosage change or refill of a controlled substance that is not an opioid or a benzodiazepine that was previously prescribed to the patient by the prescriber. (Acts 191 & 124)

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Dr. Smith is an emergency room physician. Patient D comes to the emergency room with suspected kidney stones. Dr. Smith orders the administration of an opioid to relieve Patient D's pain.

Prior to administering the opioid, must someone in the emergency department query the PDMP?

No. Querying is not required when administering a controlled substance in the course of treatment in an emergency department. (Act 122)

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Patient D is discharged from the emergency department and is given a prescription for an opioid pain medication to fill at a pharmacy.

Is a PDMP query required in this instance?

Yes. The emergency department exception to PDMP querying no longer applies upon a patient's discharge from an emergency department. Therefore, a PDMP query is required. (Act 122)

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Patient E is admitted as an inpatient to the hospital from the emergency department. After an assessment of Patient E, Dr. Harvan prescribes an opioid for pain relief.

Is a PDMP query required?

Yes. As Patient E is now an inpatient, an initial PDMP query is required. (Act 124)

Patient E is still an inpatient and Dr. Harvan prescribes a different opioid for pain relief, as Patient E was having bad side effects due to the first opioid.

Is a PDMP query required?

No. If Patient E remains an inpatient, a PDMP query is only required prior to the first issuance of a controlled substance at a licensed health care facility. Subsequent queries are not required. (Act 124)

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The Gensemer family takes a trip to Pittsburgh to gaze in wonderment at the Steelers' six Lombardi trophies. In his zeal to look at all the trophies, 15-year old Owen trips and falls, hurting his leg and ankle. His parents take him to a nearby urgent care center for treatment. The physician there decides to prescribe an opioid pain medication. The accepted medical community standards for this pain medication to sufficiently treat a minor in this situation would be to take one pill, twice a day, as needed for pain.

If no exception applies, what is the maximum number of pills this physician may prescribe?

14 pills. The opioid limitation for minors (Act 125) is an amount sufficient to treat a minor for no more than seven days. Since this prescription is for two pills a day, the physician can prescribe up to 14 pills (2 pills a day for 7 days).

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PDMP Resources

- PAMED Website – www.pamedsoc.org/PDMP
- DOH Website – www.doh.pa.gov/pdmp

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ADDITIONAL INFORMATION

If you have any questions,
please call the Knowledge Center at **855-726-3348**
or send an email to **KnowledgeCenter@pamedsoc.org**.



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