MARYLAND ADVISORY BOARD ON PRESCRIPTION DRUG MONITORING (PDMP)
June 14, 2018
4:00PM to 6:00 PM
Behavioral Health Administration
Vocational Rehabilitation Bldg.
55 Wade Ave. Catonsville, MD 21228

Attendees

Advisory Board
Audrey Clark, MPA, Chair
Daniel M. Ashby, MS, FASHP
Amit Bhargava, MD, MS, RMSK (phone)
Thomas Bond
Richard DeBenedetto, PharmD, MS, AAHIVP (phone)
David Gottlieb, DPM
Arthur Jee, DMD
Marcus Jones
Stephen A. Nichols, MD, FAAP, FAAMR
Bonnie Oettinger, RN, MGA
Orlee Panitch, MD (phone)
Derek Peck
Larry Polsky, MD, MPH, FACOG
Joseph Scalese III, RPh
Amar Setty, MD
David Sharp, PhD (phone)
Gail Shorter, DNP
Michael Vaughn

Advisory Board Not Present
Zachery Chatter, DPM
Lenna Israbian-Jamgochian, PharmD, RPh
Chris Jillson, MD
Mark D. Olszyk, MD, MBA, CPE, FACEP, FACHE, FFSMB

Board Adjunct: Linda Bethman, JD, MA, Office of the Attorney General, MDH

CRISP Representation
Lindsey Ferris, MPH
Rhonda Moody
Carmaryn Richmond (Phone)

CRISP IT Development Vendor
Mike Banfield, MPH, LeapOrbit
Mrinal Bhasker, MBA, LeapOrbit

MDH Staff
Tryphena Barnes
Kate Jackson, MPH
Katherine Johnson

Vijay Murthy, MPH
Sara Roberson, MSW
Kathleen Rebbert-Franklin, LCSW

Public
Gracie Falkenstein
Leslie Grant, DDS
Rianna Matthews-Brown, JD

Minutes

I. Roll Call and Introductions

The PDMP Advisory Board meeting opened with roll call and introductions of attendees, highlighting the new PDMP Assistant Director, Sara Roberson.

II. Agenda Review

Kate reviewed the agenda and announced that the Office of PDMP and Overdose Prevention Applied Data Programs received a Department of Health Innovation Award this morning for their role in the State's response to recent practice closure events.

III. PDMP Use Mandate Readiness for July 1, 2018

Kate provided an update on preparations for the upcoming use mandate which will go into effect July 1, 2018.

Progress toward meeting contingencies: Letters of consultation have been sent from the Office of the MDH Secretary to stakeholders soliciting feedback on use mandate implementation contingencies described in HB437 (Chapter 147, 2016) Section 9. MDH is on track to inform the legislature of its intent to implement the use mandate as planned.

Continued CRISP system testing: CRISP has completed formal testing of the CRISP system but continues to monitor system performance in advance of the use mandate effective date.

Education and outreach

- **FAQs:** A Use Mandate FAQ was created and posted on the PDMP website. The website is continually being updated based on questions and feedback from providers. Kate asked the Board members to please pass on any questions they encounter from colleagues to inform updates to the FAQs. Definitions for exemptions are being drafted for regulations; they have not yet been promulgated but have been proposed and the proposed language is included in the FAQs. Providers should use reasonable judgment while interpreting definitions, and if they have any questions, they should refer to the applicable Licensing Boards and/or consult their own legal counsel.
- **Mailing/Email:** Emails were sent on May 30, 2018 to PDMP-registered prescribers and pharmacists using the email address on file with CRISP's PDMP registration. A second email will be sent to all individuals who did not open the first email. A paper mailing to pharmacists will be sent out on June 15, 2018, and the prescriber mailing will go out on June

20, 2018. The mailings will contain the same documents as the emails. The prescriber mailing include a cover letter from the MDH Secretary, a prescriber-specific Use Mandate Fact Sheet, CDC opioid prescribing guidelines, and a suicide assessment billing codes handout. The pharmacists receive the cover letter and a pharmacist-specific Use Mandate Fact Sheet. All materials provided in the mailings can be found on the MarylandPDMP.org website.

- **Call Center:** MedChi is staffing the PDMP Mandated Use Call Center, which is operating on weekdays 8am to 6pm, with an after-hour voicemail in place and an email address providers may also use. Technical questions about PDMP access within CRISP are handled by the CRISP Customer Care Team.
- **PDMP Videos:** PDMP videos for providers will be developed with Maryland Public Television to help providers understand the use of PDMP. Providers were encouraged to contact Kate if interested in participating. Videos will be shared with the Board in the fall of 2018.

CRISP Enhancements: Lindsey Ferris presented on new CRISP functionalities to support clinical PDMP users in CRISP.

- **DEA Self Audit:** The DEA Self Audit tool, available on the Unified Landing Page (ULP), provides a report for prescribers listing all prescriptions in the PDMP attributed to them across all patients for the user-selected time period. This tool allows prescribers to view and understand their prescribing practices over time. It can also serve as a tool to audit for potential fraud concerns (e.g. a prescription pad goes missing). The user must enter their DEA number the first time for system verification as a security measure. The tool will allow multiple DEA number's in the future; for now, the prescriber needs to use the DEA number under which they registered for PDMP access with CRISP.
- **Delegator Management:** The Delegator Dashboard, to be deployed June 20, 2018, will be located on the ULP. The dashboard allows a prescriber or pharmacist to view and manage delegates who may access PDMP data on their behalf. Delegates must specify their delegator before they query the PDMP. An audit history tracks both the delegate and the selected delegator for each query.

IV. Compliance Monitoring and Provider Insight Report

Mike Banfield from CRISP's IT development sub-contractor, LeapOrbit, presented on new tools to monitor compliance with the Use Mandate. The first iteration of this tool will assist administrators. A prescriber-facing view will be developed. A brief demo of new functionality was conducted, including both aggregate data and individual-level PDMP queries compared with dispensed prescriptions attributed to a specific prescriber. These functionalities are still under development and feedback from the Board members will be used in further refinement.

Board Feedback on IT and Policy Questions:

- **Dispenser compliance:** The question was asked whether pharmacy inspections include PDMP monitoring or not. Monitoring the PDMP is not currently in statute as a requirement for the Board of Pharmacy or the Office of Controlled Substances Administration inspections, and thus is unlikely to be done. It was suggested that CDS sales to pharmacies, using Automation of Reports and Consolidated Orders System

(ARCOS) data, should be compared to CDS dispenses. A newly passed bill requires sales to be reported to the AG's Office.

- **Electrical/Tech Failure:** PDMP staff clarified that in the case where there is an electrical or technological failure precluding access to PDMP data, the prescriber should document the issue and then use their clinical judgment in prescribing.
- **Use Mandate links**: The PDMP office has worked with MedChi, CRISP, and other organizations to link to the PDMP website, where materials will be updated, ensuring all entities display the most current information.
- **Overdose Fatality Review:** A Board member asked whether local Overdose Fatality Review teams may request PDMP provider audit trails. Kate responded that the Program will take a look at this question internally as it had not previously been posed.
  Accountability and Documentation: A Board member asked if there would be any consequences for the prescriber who queries the PDMP often, but the one patient that the prescriber did not query overdoses, is 100% compliance expected? PDMP staff reiterated that enforcement of the Use Mandate is governed by the existing complaint-driven investigation processes in place with the health profession licensing boards. If a complaint is lodged with a licensing board, there is a duty for that board to investigate.

V. PDMP Regulations and Response to Comments

Kate presented the two comments submitted during the open comments period for the latest round of PDMP regulations as well as the drafted responses to these comments. Feedback was provided by Board members for incorporation into the final responses, which will be submitted for review by PDMP staff.

VI. Public Comments– None.

Meeting Adjourned