# Alabama Board of Medical Examiners

Controlled Substance Prescribing in Collaborative/Supervisory Relationships: Roles and Responsibilities



MISSION OF THE ALABAMA STATE BOARD OF MEDICAL EXAMINERS AND MEDICAL LICENSURE COMMISSION

"The Alabama Board of Medical Examiners and the Medical Licensure Commission of Alabama are charged with protecting the health and safety of the citizens of the state of Alabama."

> William M. Perkins Executive Director

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# What's New?

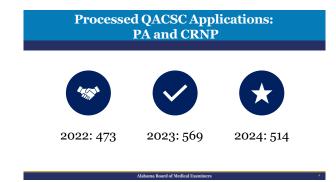
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Online Payments



New Rule for PAs– Alternative to the requirement of completing 12 months of active clinical practice in Alabama to qualify for a QACSC











|                   | Alabama Board of Me  | dical E | xaminers 8  |
|-------------------|--|---------|---|
| Chapter 540-X-15  | Telehealth (Repealed 12/23/15)   | A.      | Appendices  |
| Chapter 540-X-14  | Continuing Medical Education   | 8       | Physician Supervision of Athletic Trainers  |
| Chapter 540-X-13  | Alabama Physician Health Program   | 6       | Collaborative Pharmacy Practice   |
| Drapter \$40-X-12 | Qualified Alabama Controlled Substances Registration Certificate (QACSC)     | 5       | Physician Recommendation of the Use of Medical Cannabis   |
| Chapter 540-X-11  | Guidelines for the Use of Lasers and Other Modaities Affecting Living Tissue | 2       | Physician Assistant Reentry Into Practice   |
| Chapter 540-X-10  | Office-Based Surgery   | 3       | Physician Reentry Into Practice   |
| Chapter \$40-X-8  | Missilareous   |         | Alabama Concerning the Interstate Medical Licensure Compact   |
| Chapter \$40-X-8  | Advanced Practice Nurses: Collaborative Practice                             | 2       | Joint Rules of the Alabama Board of Medical Examiners and the Medical Licens                            |
| Chapter 540-X-7   | Assistants to Physicians   | 1       | Policy on Data 2000: Guidelines for the Treatment of Opioid Addiction in the M<br>(Repealed 10/15/2023) |
| Chapter \$43-X-6  | Conduct of Haarings in Contested Cases                                       | D       | Limited Purpose Schedule II Permit (LPSP)   |
| Chapter \$40-X-\$ | Hearings and Appears   | 9       | Pain Management Sevices   |
| Chapter 540-X-4   | Controlled Substances Certificate  |         | Nurse Practitioners (CRNP) and Certified Nurse Midwives (CNM)   |
| Chapter \$40-X-3  | Certificate of Qualification   | 8       | Qualified Alabama Controlled Substances Registration Certificate (QACSC) for                            |
| Chapter 545-X-2   | Definitions  | 7       | Guidelines and Standards for the Utilization of Controlled Substances for Weig                          |
|                   | Organization and Administration  | 6       | The Practice of Medicine or Osteopathy Across State Lines (Repealed 30/15/22                            |

# In the Controlled Prescribing Rules, you will find.....

Important definitions for prescribing of standard, specialty, and controlled medications

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- Qualifications of the CRNP/CNM/PA to apply
- U Physician responsibilities
- Renewal Information
- Protocols for prescribing

# Prescriptions and Medication Orders by CRNPs, CNMs, and PAs

May not sign prescriptions for controlled substances without a Qualified Alabama Controlled Substances Certificate and a DEA.

• May call and/or write a verbal order for a controlled substance provided....

• Collaborating physician has approved the medication and either signed the Rx or given a verbal order which is written in the medical record

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- The CRNP/CNM/PA verbal order must be signed by the physician within 7 business days



Qualified Alabama Controlled Substance Certificate



# Controlled Substance Prescribing

ØDefine separate policies in your practice for prescribing legend drugs and controlled drugs

ØCheck Medical Staff Bylaws and facility policies prior to writing inpatient orders for Controlled Substances

ØYou will need a QACSC and your own DEA if writing prescriptions for discharge that will be filled at an outside pharmacy

| <b>Obtaining a QACSC</b>           |  |  |  |
|------------------------------------|--|--|--|
|                                    |  |  |  |
|                                    | Eligibility Requirements to obtain a QACSC   |  |  |
| ¥                                  | Collaborative Agreement(s) or Registration Agreement(s) with Final<br>Approval by the ABN/BME totaling at least 12 months in the State of<br>Alabama   |  |  |
|                                    | Attended the controlled prescribing seminar presented by the Medical<br>Association State of Alabama to obtain the 12 AMA PRA Category 1<br>credits offered (Register at <u>www.alamedical.org/prescribing</u> ) |  |  |
| Ę                                  | Send in application for QACSC within one (1) year of completing the prescribing course. Application must be approved by the Board. The Board meets once a month  |  |  |
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# Where do I find the Applications?



#### Next step: Click on FORMS or Application Forms



#### Forms

- + Prescribing Protocols for QACSC and LPSP
- + Initial QACSC Application for CRNPs/CNMs Application and Instructions

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 $+ \quad {\rm Additional\ QACSC\ Application\ for\ CRNPs/CNMs\ Application\ and\ Instructions}$ 

#### Fees

- + Initial QACSC: \$110
- + Additional QACSC: \$60
- + QACSC renewal: \$60
- Print receipts at the Licensee Portal.





## QACSC Application

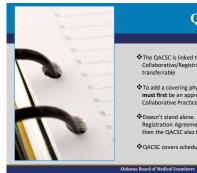
- The CP# is the collaborative practice number assigned to your CP once you have been given final approval. It is found on the CP certificate in the physician's licensee portal
- Must state "yes", "no", or "restricted"
- Written plan for review must be completed. This explains how the physician will monitor the NP/ PAs prescribing

# **Example of Written Plan for Review**

"The collaborating physician will monitor 10% of the CRNP/PA's patient records for controlled substance prescribing for accuracy. Patient outcomes will also be reviewed. All patients with adverse outcomes will be thoroughly reviewed and appropriate plan of action will be determined by the physician."

- 10% is not required, but it should be a meaningful sample.
- 100% adverse events must be reviewed.
- \*\*Controlled prescribing can be part of the quarterly QA review!

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# QACSC

- The QACSC is linked to a specific Collaborative/Registration Agreement. It is NOT transferrable
- To add a covering physician to the QACSC the physician must first be an approved covering physician on the Collaborative Practice or Registration Agreement
- Doesn't stand alone. If the Collaborative Practice or Registration Agreement linked to the QACSC terminates, then the QACSC also terminates

OACSC covers schedules 3, 3N, 4, and 5

# Which license do I apply for first?

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A) QACSC

# B) DEA

# Applying for the DEA

- Do not apply for the DEA until you have approved for and have been issued a QACSC
- Apply for DEA Registration at <u>www.deadiversion.usdoj.gov</u> and then send a copy of the certificate to the BME
- Your QACSC status will be "Active Pending DEA" until we receive a copy of the DEA. You cannot print your certificate or renew the QACSC for the next calendar year with this status!

You are not authorized to write a prescription for a controlled substance in Alabama without both the QACSC and the DEA

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# **Do I Need Multiple QACSCs?**



 NP/PA works with the physician in his/her primary practice site Monday thru Friday.

On the weekends, they also work together at the ER in their town. Does the NP/PA need a QACSC for each site?

# Answer: NO

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- If all practice sites are listed on the Collaborative Practice Agreement and the physician can walk into any listed site and see patients and records, only one QACSC is required.
- \*If NP/PA works at Urgent Care on the weekends under a <u>different</u> collaborating physician, then 2 QACSCs would be required. One for each physician/site.
- \*\*If a PA has multiple registration agreements with the same physician, the PA may be required to have a QACSC for each registration agreement.



Controlled Substances for Weight Reduction... Can I Prescribe?



540-X-17-.02 Schedule II Controlled Substances.

"A physician shall not order, prescribe, dispense, supply, administer or otherwise distribute any Schedule II amphetamine or Schedule II amphetamine-like anorecitic drug, or Schedule II sympathomimetic amine drug or compound thereof or any sait, compound, isomer, derivative or preparation of the foregoing which is chemically equivalent thereto or other non-narcotic Schedule II stimulant drug, which drugs or compounds are classified under Schedule II of the Alabama Unitorm Controlled Substances Act, to any person for the purpose of weight control, weight lass, weight reduction or treatment of obesity.

# 540-X-17-.03 Schedule III, IV And V Controlled Substances for Weight Reduction:

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(1) Only a doctor of medicine or doctor of osteopathy licensed by the Medical Licensure Commission of Alabama may order, prescribe, dispense, supply, administer or otherwise distribute a controlled substance in Schedule III, IV or V to a person for the purpose of weight control, weight loss, weight reduction, or treatment of obesity, except that a *Physician Assistant*, *Certified Registered Nurse Practitioner or Certified Nurse Midwife may prescribe non-controlled drugs for such purpose*. If a Physician Assistant, Certified Registered Nurse Practitioner or Certified Nurse Midwife prescribers non-controlled drugs for weight reduction or the treatment of obesity, the prescriber shall comply with the guidelines and standards of this Chapter which apply to MDs and DOs. (2) A <u>written prescription</u> or a written order for any controlled substance for a patient for the purpose of weight reduction or treatment of obesity <u>shall be</u> <u>signed</u> by the prescribing physician on the date the medication is to be</u> <u>dispensed</u>, or the prescription is provided to the patient

If an <u>electronic prescription</u> is issued for any controlled substance for a patient for the purpose of weight reduction or treatment of obesity, the prescribing physician **must sign and authorize** the transmission of the electronic controlled <u>substance prescription</u> in accordance with federal law and must comply with all applicable requirements for Electronic Prescriptions for Controlled Substances

Such prescriptions or orders shall not be called in to a pharmacy by the physician or an agent of the physician Matama Board of Medical Examiners

> (3) The prescribing/ordering physician shall be <u>present at the</u> <u>facility</u> when he or she prescribes, orders or dispenses a controlled substance for a patient for the purpose of weight reduction or treatment of obesity

Author, Alabama Board of Medical Examiners Statutory Authoniy: Code of Ala. 1975, §34-24-83. History: New Rule Filed December 16, 2011; effective January 20, 2012. Amended: Filed June 18, 2015; effective July 23, 2015. Amended: Published August 31, 2020; effective October 15, 2020

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Know the Rules of Prescribing Controlled Medications

# Code of Alabama 20-2-260

• A PA, CRNP or CNM authorized to prescribe.... shall not prescribe, administer, or dispense any controlled substance to:

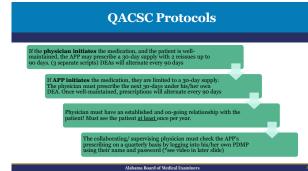
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- his or her own self
- ✤ spouse
- child
- parent



What are the QACSC & LPSP Protocols?

The Protocols govern how you prescribe controlled medications!



## NP/PA Initiates a Schedule 4 Drug for a Patient

- · He/she may prescribe a 30-day supply.
- · Next visit: the physician must write the follow up prescription under his/her DEA.
- If the patient is well-maintained, the NP/PA may write the next 30-day prescription with 2 reissues (up to 90 days).
- The physician should write the next 90-day prescription under their own DEA/ACSC.
- The PDMP should reflect the alternations every 90 days.
- You can see this information under the patient in the PDMP.
- Physician should see the patient at least once per year.
- If physician initiates the medication, the NP/PA may write a 30-day prescription with 2 reissues if well-maintained.

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#### "I prescribe electronically and send my physician the prescriptions to review. Does this count?"

The PDMP must show alternating prescribers.

The prescriptions must be **signed** by the NP/PA or physician- not just "reviewed".

Check your PDMP regularly. Call the pharmacy if you find discrepancies.

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Medication Assisted Treatment (MAT) is the use of FDA-approved medications, in combination with counseling and behavioral therapies, to provide a whole-patient approach to the treatment of substance use disorders

## Can I Become a Data-Waivered Practitioner in Alabama?

- On December 29, 2022, with the signing of the Consolidated Appropriations Act of 2023, otherwise known as the Medication Access and Training Expansion(MATE)Act, Congress eliminated the "Data-Waiver Program"
- A Data Waiver registration is no longer required to treat patients with buprenorphine for opioid use disorder
- Going forward, all prescriptions for buprenorphine only require a standard DEA registration number. Prescriptions no longer require the X DEA number
- There are no longer any limits or patient caps on the number of patients a prescriber may treat for opioid use disorder with buprenorphine
- The Act does not impact existing state laws or regulations that may be applicable QACSC protocols still apply!
- The Act also introduced new training requirements for <u>all prescribers</u>. These requirements went into effect on June 27, 2023, for initial and renewal applicants

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## Practitioners Can Meet This Requirement in One of Three Ways:

- A total of 8-hours of one-time training<sup>+</sup> from a range of training entities on opioid or other substance use disorders. (Practitioners who previously took training for the DATA-2000 waiver to prescribe bupenorphine can count this towards their 8-hour training requirement)
- 2) Board certification in addiction medicine or addiction psychiatry from the American Board of Medical Specialties, American Board of Addiction Medicine, or the American Osteopathic Association
- 3) Graduation within 5 years and in good standing from a medical, advanced practice nursing, or
  physician assistant school in the United States that included successful completion of an optioid or other
  substance use disorder curriculum of at least 8 hours. This curriculum must have included facething on
  the treatment and management of patients with optioid and other substance use disorders, including the
  appropriate clinical use of all drugs approved by the Food and Drug Administration for the treatment of a
  substance use disorder
- ""See SAMHSA's website for a complete list of approved accretized CME organizations/providers & additional details. The 8-hour portion of this course meets the requirement! Alahama Beard of Medical Examiners

# Limited Purpose Schedule 2 Permit

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|  | Requirements   | Important   |
|--|--|---|
|  | Current /Active QACSC  | Covering physicians must first be<br>on the QACSC   |
|  | Current/Active DEA   | LPSP will terminate along with the<br>QACSC if the Collaborative<br>Agreement Terminates  |
| Limited Purpose<br>Schedule 2 Permit<br>(LPSP) | Submit Application to include<br>the drug groups need for your<br>practice | Long-Acting Schedule 2<br>medications are historically <b>only</b><br><b>approved</b> for Hospice/ Palliative<br>Care under the umbrella of<br>Hospice/Oncology/ Rehab clinical<br>practices/ nursing homes |
|  | Submit explanation for the need of each drug group requested               | Not just the drug name  |

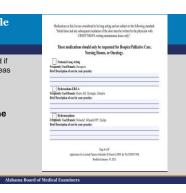
| (1) TO Ber Old Theorem   | OF MEDICAL EXAMINERS<br>ap. 43. IN100 OPDIM: (2011 20-010)<br>the discusser is a guildly result<br>presented rays or regard.   | LPSP<br>Application  |
|--|--|----------------------|
|  | pose Schedule II Permit for PA/CRNP/CNMs<br>with a Licensed Physician  | Аррисацой            |
| As set firstk in Al. Code § 20.2-280, dae Alabama B<br>Schulate III Permit to a Certified Registered Naria I<br>whe has a revenue americation largest the machine is | oard of Medical Exercises may gran a Limited Parpose<br>technicae, Cariffial Naras Midwith or Physiciae Associat<br>the Nate of Address, a searce Californities Agreement or<br>of Cariffield Address Convertical Schwarzer Carifficae |                      |
| CHNP CNMP A printed same   | Specially  | *Specific drug grou  |
| Collaborative Practice Regulation Agreement #  | section and the administrate Composited II Madications only  | Speeme ur ug grou    |
| ADIID Medications  | ençeleşiphencides IN-2, Desemanyelesiananı   | *Frequently Used     |
| Ludeumpheumine: Dimension: Ampheumine Sal<br>Franzonith Used Brands: Addered: Addered VA   | 000<br>Concurso, Daymanic, Decentrinic, Eveloric, Freedox, Focultin<br>Inc. Qualificance, Qualificant XR Attuation, Kinden LANK  |                      |
| () venue: Zerzell<br>Brief Description of use for your practice:   | an Banadar Banada Seconda Seconda Seconda  | Brands - not an      |
| IIIvdrocodone Combinations   |  | exhaustive list, jus |
| Prophetic Used Brands: Jonnie, Hyrer, Busine<br>Desperator, Zedone<br>Brief Description of one for your practice:  | Shavalore, Alexes News Ellistr, Arpresente Frieden;  |                      |
| Whit Description of use for your practice:   |  | examples             |
| Hydrocodine (Cough Preparation)<br>Preparation (Cough Preparation)<br>Preparation (Cough Preparation)<br>Read Description of our for your aractics                   | nalogni: Tastanon PK: Zarigeri: Tastagoni: Florprofin:   | · · · <b>·</b> · ·   |
|  |  | *D                   |
|  |  | *Brief Indication –  |
| Application for Limited Perpose 5  | Page J of 5<br>Colorda II Diversiol, PSP9 for PACIENP/CNM<br>6 Remark (4, 2023   | a list of medication |
|  |  | I Examiners          |

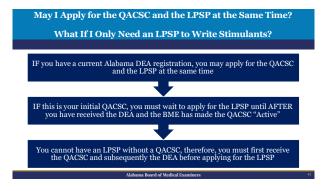
## Long-Acting Schedule 2 Medications

These should only be requested if providing primary care in the areas of

## • Hospice

- Palliative Care (under the umbrella of hospice)
- Oncology
- Nursing Homes



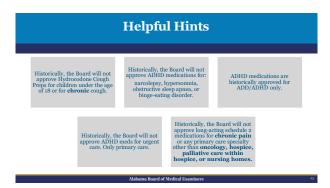




PA/NP requested ADHD Medications, Hydrocodone Cough Preps and Hydrocodone Combinations on LPSP application. • PA/NP needs to **add** Oxycodone IR medications.

> PA/NP may submit a request for an **LPSP Expansion**. This may be done at any time for no additional fee. The request will still go before the Board of Medical Examiners for review and approval.

> > If the expansion request is for **ADHD Medications**, the DEA will need to be updated to reflect the addition of **2N** medications.





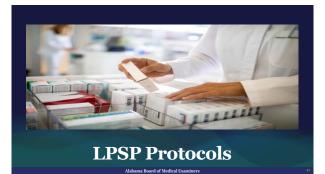
After receiving approval from the BME, you will need to **update** the DEA with the new approved drug schedules to include 2 and/or 2N

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You cannot utilize the LPSP until this has been completed, and you have received the updated DEA certificate

Scan/email or upload a copy of the updated DEA certificate once received



# Schedule 2N- Stimulants

- If the <u>physician</u> initiates a **stimulant (2N)** and the patient is well-maintained, the CRNP/CNM/PA may prescribe a 30-day supply with two reissues not to exceed a 90-day supply.
- If the <u>CRNP/CNM/PA</u> initiates a **stimulant (2N)**, the PA/NP/CNM may write a 30-day supply.
- The <u>physician must SEE the patient</u> before medication is continued and the physician must prescribe the next 30 days under his/her own DEA and ACSC.
- Once the patient is well-maintained, the PDMP should reflect alternation of prescribing DEAs every 90 days.

# PA/NP Initiates a 30-day supply of an ADHD medication

- Next visit: Physician must <u>physically see</u> the patient AND write the next 30/60/90-day prescription under his/her DEA and ACSC
- If the patient is well-maintained, the PA/NP may continue the medication with a 30-day prescription and 2 reissues up to 90 days
- If an escalation is needed, the PHYSICIAN must prescribe under his/her DEA

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• Prescriptions alternate every 90 days in PDMP

# Schedule 2

If the <u>physician</u> **initiates** a short acting Schedule **2** medication, the CRNP/CNM/PA may write the next 30-day prescription. Then the prescriptions would alternate between DEA's **every 30 days** 

If the <u>CRNP/CNM/PA</u> **initiates** a short acting Schedule **2** medication, the CRNP/CNM/PA may write a 30-day supply. The **physician must SEE the patient** before medication is continued. Physician must prescribe the next 30 days under his/her own DEA and ACSC

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PA/NP Initiates a 30-day supply of Hydrocodone Combination medication for a patient that has back pain

- Next visit: Physician must <u>physically see</u> the patient and write the next 30-day prescription under his/her own DEA and ACSC
- PA/NP may continue the medication with a 30-day prescription if wellmaintained alternating with the physician. NO reissues!
- ➢PDMP should show alternation between prescribers every 30-days
- >All escalations written by the physician

# LPSP Protocols Continued

All schedule 2/2N escalations must be prescribed by the physician under his/her DEA and ACSC

Only a physician may <u>initiate/escalate</u>long-acting schedule 2 meds.

CRNP/CNM/PA may write maintenance doses only in oncology, hospice, palliative care within hospice, and nursing home/rehabilitation facilities

Must be approved on LPSP application

A QACSC and/or LPSP holder is **NOT ALLOWED** to <u>dispense</u> controlled substances in any schedule

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# Physician **initiates** a <u>long-acting</u> schedule **2** medication for an oncology patient.

- ✓ Physician MUST initiate medication
- ✓ PA/NP may write a 30-day maintenance dose only
- $\checkmark$  Physician must write the escalation, if needed
- ✓ PDMP should reflect the prescriptions alternating every 30 days

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# Scheduled 2 and 2N Medications



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## **EPCS: Why is This Important?**

\*EPCS is one and the same as a practitioner <u>physically signing</u> a prescription \*Do not send a controlled medication via EPCS unless you are physically registered appropriately with your own signature

\*If you do not have an LPSP and DEA, you should never send in a controlled medication for another prescriber via EPCS \*If you have an LPSP and DEA, but you are not authenticated by the DEArequired process, you should also never send in a controlled medication via EPCS

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# Risk Mitigation Includes: Pill Counts Urine drug screens PDMP checks Consideration of abuse deterrent medicitons Monitoring the patient for aberrant behavior Using validated risk assessment tools Co-prescribing receiving opioid determed appropriate Providing patients with risk education prior to prescribing

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# What if the Pharmacy says I am not authorized to write controlled substances?

Medicaid does require that you submit a copy of your DEA certificate directly to them.

- Prescribers of controlled substances are mandated to re-negister their DEA License every three years. To ensure your DEA is on file at Medicaid, upload a copy of the provider 3DEA Registration Certificate to the Medicaid Interactive Web Portal or fas to (334) 215-716 with the baccode over sheet that is a provided in the Interactive Web Portal are ned of the Enclident Updase request. Please be sure to include the provider y name, MP number, and license number on the certificate. Medicaid will apply the DEA to all service locations based on the provider 3VH and license number (whising all @gammetinethiotighes.com)
- Call and speak with a pharmacist about a specific patient with a medication that was denied
- Ask specifically for the reasons why. Many times, it has to do with the pharmacy not being able to access your QACSC and DEA
  information through their third-party vendors (This is usually the case!!)
- Make sure you have added the appropriate schedules to your DEA!
- It can be an insurance issue where they are denying the medication because there is something specific that needs to be addressed as far as being a credentialed provider for that specific insurance company
- Go to our vebalite at www.abune.gov.go under "License Search": enter ONLY your first and Lest name C. Elick, "I am not a robot". Please citick on the icontaib under the far-right column to view the details that we have listed for your QACSC and/or LPSP. Make sure all of this is appropriate
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## **Quality Assurance for Controlled Prescribing**



Controlled substance prescribing can be a part of your quarterly QA

Data can be compiled by office staff and reviewed by physician/CRNP/CNM/PA

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#### COLLECTIVE QA REPORT: PRESCRIBED MEDICATIONS

| Total # of patients seen:  |                            | Adverse Outcomes:            | YN                              |
|----------------------------|----------------------------|------------------------------|---------------------------------|
| SUMMARY STATEMENT          | T: On the above date       | (insert #) charts            | identifiers listed below were   |
| chosen at random and revie | wed for quality monitori   | ng. The charts were review   | ed for the following Prescribed |
| Medication indicators:     |                            |                              |                                 |
| 1. Medications are pre     | scribed per FDA guideli    | nes (per PDR, NP Manual,     | or Product Insert)              |
|                            |                            | ame, dosage, and directions  |                                 |
|                            |                            | he patient dx according to p |                                 |
|                            |                            | ing to regulations of BME a  |                                 |
| 5. No medications wer      | re ordered or refilled due | to nature of visit           |                                 |
| Chart #/Identifier         |                            |                              |                                 |
| Date of Service            |                            |                              |                                 |
| D=Discussed -noted         | 1.                         |                              |                                 |
| changes which are          | 2.                         |                              |                                 |
| needed                     | 3.                         |                              |                                 |
| # = Appropriate            | 4.                         |                              |                                 |
| NA=Not applicable          | 5.                         |                              |                                 |
|                            |                            |                              |                                 |
| Chart #/Identifier         |                            |                              |                                 |
| Date of Service            |                            |                              |                                 |
| D=Discussed -noted         | 1.                         |                              |                                 |
| changes which are          | 2.                         |                              |                                 |
| needed                     | 3.                         |                              |                                 |
| ? = Appropriate            | 4.                         |                              |                                 |
| NA=Not applicable          | 5                          | 1                            | 1                               |

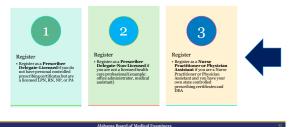
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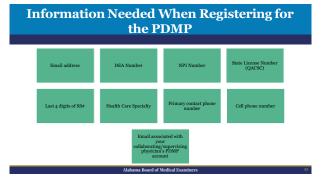
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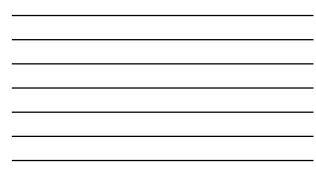
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# Prescription Drug Monitoring Program (PDMP)

# **PDMP: Registration**

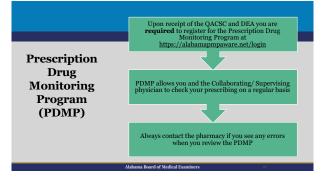


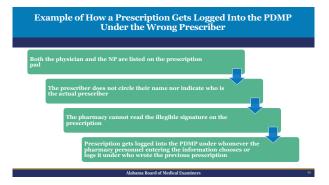






Training Videos Available on the PDMP Website: www.alabamapublichealth.gov/pdmp/ Maama Board of Medical Examiners





# \*My Rx Report

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HOW PRESCRIBERS CAN VIEW PRESCRIPTIONS FILLED UNDER THEIR DEA NUMBER

- A training video is located on the PDMP website www.alabamapublichealth.gov/pdmp/
- Completing this process fulfills the obligation of the physician to check CRNP/CNM/PA's prescribing quarterly as it will show the CRNP/CNM/PA's prescribing



A log should be maintained in the office; in the event an audit is done, and proof is requested. If you find any discrepancies, you should notify the dispensing pharmacy

PDMP CONTRACT AGREEMENT



- Agree to check current patients and/or potential patients of your practice only
- Privacy Statement: Any person who intentionally obtains unauthorized access.....shall be guilty of a Class C Felony
- Unlawful Disclosure: Any reproduction or copy of the information is privileged and confidential....not subject to subpoena or discovery in civil proceedings
- O MAT may require more frequent PDMP checks!

## PDMP: Tool and Resource

NarxCare is a software platform imbedded in your PDMP report

Information assists providers when making prescribing decisions

- The NarxCare provider application is divided into 4 regions:
- 1. Header patient information and tutorials
- 2. Scores and Indicators Narx, Overdose Risk Score (ORS) and Additional Risk Indicators

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3. Graphs - important details of prescription use

4. Full Prescription Detail - add detail for each prescription dispensed



· This report reveals Risk Indicators and will show how many prescriptions are active in a specific drug type

- The Risk Score should be used to trigger discussion and draw awareness to the presence of significant PDMP data
- It should be used to guide decision making. It should NOT be used as a single factor in clinical decisions. Alabama Board of Medical Examiners
- Explanation & Guidance offers excellent information!

Understanding a Patio Graphs 2

## **Updated CDC Guidelines**

- Based on updated CDC Guidelines released in November 2022, adjustments have been made to the morphine milligram equivalency (MME) calculation in the Prescription Drug Monitoring Program database.
- Specifically, the CDC made changes to commonly prescribed opioids for pain management resulting in changes to MME conversion calculations. An example of this includes Tramadol:

Example of Previous MME Conversion Calculation:

Tramadol 50 mg \* (180 qty/30-day supply) \*0.1 = 30 MME

Example of Updated MME Conversion Calculation:

Tramadol 50 mg \*(180 qty/30-day supply) \*0.2 - 60 MME

For a full list of opioids with updated conversion factors, please visit the CDC Guidelines more or he 7103a1.htm?s\_cid=rr7103a1\_v Alabama Board of Medical Examiners

#### How Often Do I Need to Check the PDMP? \*\*Nursing homes, hospice prescriptions, treatment of active malignant pain, intra-op are EXEMPT

- For prescriptions totaling less than 30 MME/day or 3 LME/day, practitioners are expected to use the PDMP in a manner consistent with good clinical practice
- MME greater than 30/day or LME greater than 3/day requires a PDMP check at least twice annually
- MME greater than 90/day or LME greater than 5/day requires a PDMP check with every prescription written on the same day that it is written

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#### Highest Ranking States for Prescribing Opioids in 2023 CDC

Highest opioid dispensing rates per 100 persons in 2023:

1) Arkansas (71.5)

#### 2) Alabama (71.4)

- 3) Mississippi (63.1)
- 4) Louisiana (62.7)

(Tennessee had the highest opioid prescription rate for every 100 persons at  $94.4)\,$ 

Alabama has the highest downward trend (50%) for prescribing opioids in the nation!

From 140 Rx per 100 patients in 2017-2018 to 71 Rx per 100 patients in 2023

While this is great news, we are still second highest in the nation for dispensing opioids

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Lowest States in the Nation for Dispensing Opioids in 2023 CDC

Lowest dispensing rates per 100 persons in 2023:

1) Hawaii (22.6)

2) California (23.8)

3) New Jersey (26.3)

4) New York (26.3)

\*\*We are dispensing 45.1- 48.8 per 100 persons higher!

| DR. T. W. JACKSON<br>Manchester, Ga. Regime No. 304<br>Telephone 110    |               |
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# **Federal Prescription Requirement**

• Title 21-Part 1306 (a) Code of Federal Regulation:

(a) All prescriptions for controlled substances shall:

Be dated as of, and signed on, the day they are issued
Bear the full name and address of the patient

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# **Prescription Format**

| Name, Practice Address, Phone # for Collaborating Physician   |  |  |
|---|--|--|
| Name and License #  |  |  |
| QACSC#, LPSP#, and DEA#, if medication is controlled  |  |  |
| Demographic information if different from Collaborating Physician                                   |  |  |
| Date prescription is written  |  |  |
| Two signature lines: "Dispense as Written" and "Product Selection Permitted"                        |  |  |
| May use "Notes" section if unable to fit all necessary information required                         |  |  |
| Make sure the pharmacist can see what you, the prescriber, are seeing! Sometimes it is NOT the same |  |  |

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| John Doe, MD           | Jane Doe CRNP/ Lic # 1-000000       |
|------------------------|-------------------------------------|
| 123 Anywhere St.       | QACSC #12345/ LPSP #12345           |
| Any town, AL 33333     | DEA # MD1234567                     |
| Telephone 334-123-4567 | Address if different from physician |
| Patient Name           | Date                                |
| Patient Address        |                                     |
|                        |                                     |

Rx

Dispense as written

Product Selection Permitted

# **RENEWALS:** QACSC, LPSP, and DEA

- Any QACSC and/or LPSP obtained during the calendar year must be renewed annually before 12/31 for the next calendar year
- Renewals for the QACSC and/or LPSP are processed online between 10/01-12/31 <u>www.albme.gov</u>
- The fees are \$60.00 for each QACSC and \$10.00 for each LPSP
- Obtain 4 AMA PRA Category 1 credits every 2 years through a Board approved course/courses
- DEA renewals are processed on the DEA website: <u>www.deadiversion.usdoj.gov</u> every 2-3 years. The DEA will send one email reminder 30 days in advance. The fee is \$888. Please send the BME a copy



\$888. Please send the BME a copy
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## Renewal is Required for Both the QACSC and LPSP

 $\checkmark$  QACSC is renewed FIRST. You will see RENEW to the right of the license

 $\checkmark$  At the end of the QACSC renewal, you will see an Alert! message that says,

"Your renewal has been submitted. Click yes to continue renewing more registrations", if applicable. Click no to go back to your profile.

✓ If you have a Limited Purpose Schedule 2 Permit (LPSP), you should click YES – it will take you directly to the LPSP Renewal

 $\checkmark$  If you click NO, you will need to renew the LPSP in the profile.

✓ If you fail to renew the QACSC or the LPSP, you will not have the ability to write controlled substances after December 31<sup>st</sup>!

## ✓You may print your renewal receipt and certificate in the profile.

## **December or January Issue**

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If this is your **FIRST** (Initial) QACSC and your application is approved in December, the QACSC will be issued **JANUARY 1\*** 

\*The DEA takes 2-4 weeks to receive. If the DEA is not received in time to renew the QACSC by December 31, you could incur late fees/penalty fees

Any Additional QACSC or LPSP license issued in November or December will have to be renewed by December 31 to remain active for the following year!!

#### If the QACSC is Not Renewed by December 31, it Will EXPIRE.... If the QACSC is reissued between January 1- January 31, a LATE FEE of \$75.00 will be added to the \$60 renewal fee <u>A paper renewal form must be completed after January 31</u> If the QACSC is reissued after January 31, and NO PRESCRIBING has occurred, a PENALTY FEE of \$11.00 will be added to the \$60 renewal fee

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If the **QACSC** is reissued after January 31, and there is evidence of prescribing, a **PENALTY FEE of \$150.00** will be added to the **\$60** renewal fee

# If the LPSP is Not Renewed by December 31, it Will EXPIRE....

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If the LPSP is reissued between January 1 – January 31, a LATE FEE of \$50.00 will be added to the \$10 renewal fee A paper renewal form must be completed after January 31

If the LPSP is reissued after January 31, and NO PRESCRIBING has occurred, a PENALTY FEE of \$95.00 will be added to the \$10 renewal fee

If the LPSP is reissued after January 31, and there is evidence of prescribing, a PENALTY FEE of \$125.00 will be added to the \$10 renewal fee

Make sure to complete your evaluation! Without it, you will not receive your CME credits from the Medical Association!

# Advanced Paced Cape DepartmentsMarcine Rowell, BSN, BD<br/>Bacher for Advanced<br/>Paced Rowell/Bacher Rowell, Bacher Rowell, Bacher Rowell, Bacher Rowell, Bacher Bacher Rowell, Bacher Bacher

