Dispensers (pharmacies) licensed by the MN Board of Pharmacy must report daily, all **Minnesota schedule II-V controlled substances, butalbital and gabapentin prescriptions.**

- Schedule III: Human growth hormone, chorionic gonadotropin
- Schedule V: Pseudoephedrine, ephedrine
- Gabapentin is not a controlled substance
- All formulations of butalbital, irrespective of schedule
How is a pharmacy considered compliant?

• Daily Reporting
  • Either at the end of the business day or during the following business day
  • Submit a “zero report” or prescription data as applicable
  • Timeframes of greater than one day are not permitted

• Prescriptions containing error must be resolved within seven days of the initial erroneous submission
MN PMP located in the MN Board of Pharmacy
• Direct access to licensure files
• BOP collects license number
• PMP collected DEA number and added to licensure files
• Exemption status, generation of compliance letters, dates of correspondence, notes, captured in license files
The MN PMP migrated from the RxSentry system to Appriss’s PMP AWARRxE system.

**December 4, 2018**

**Pre-Migration Data Effort**
- Received a list of elements that were “hard required”
- Sent letters to pharmacies with open errors
- 27 pharmacies = 2,368 errors

**Post-Migration Data Effort**
- 2,206 Rx failed migration from 157 pharmacies
- Mailed letters with action items
- 2nd and final notice sent
- Resolved!
Errors, Warnings, Minor/Serious/Fatal Errors...Oh my!

**Minor Error** = will load

**Serious Error** = will load if <20% of the entire file contains serious errors. If >20% of the file contains serious errors, the entire file will reject.

**Fatal Error** = will not load. Entire file will fail if >10% of it contains fatal errors.

**Errors** = Fail.
**Warnings** = Load.
**Errors** = Fail. Only the Rx with the error will fail. The rest of the file will load.

**Warnings** = Load. File status report lists a warning message to include the field in future fills.
## Appendix C: Dispensation Validation Severity Specifications

<table>
<thead>
<tr>
<th>Segment</th>
<th>Element</th>
<th>Name</th>
<th>Required</th>
<th>Severity</th>
<th>Notes:</th>
</tr>
</thead>
<tbody>
<tr>
<td>PHA: PHA</td>
<td>PHA01</td>
<td>Pharmacy NPI Number</td>
<td>S*</td>
<td>Dispensation Error*</td>
<td>If Pharmacy does not have a DEA Number, NPI is required.</td>
</tr>
<tr>
<td></td>
<td>PHA02</td>
<td>NCPDP/NABP Provider ID</td>
<td>S</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td></td>
<td>PHA03</td>
<td>Pharmacy DEA Number</td>
<td>R*</td>
<td>Dispensation Error*</td>
<td>If Pharmacy does not have a DEA number, NPI is required.</td>
</tr>
</tbody>
</table>

Our Process

Update Pharmacy List in AWARxE

Extract Compliance Report from Tableau

1st DEA # Request

1st "No Data" Letter

1st "No Data" Letter

1st "No Data" Letter

1st Inadeq. Reporting

2nd "No Data" Letter

2nd "No Data" Letter

2nd Inadeq. Reporting

Executive Director Notice

Executive Director Notice

1st Inadeq. Reporting

2nd Error Notice

1st Error Notice

2nd Error Notice

2nd Error Notice

1st Error Notice

Courtesy call to Pharmacy

Courtesy call to Pharmacy

Courtesy call to Pharmacy

Refer to Executive Director of BOP
No Data Reported by Pharmacy

• Filter Tableau Compliance Dashboard to display all pharmacies who are Not Submitting
  • Exclude exempt pharmacies
Inadequate Reporting (not daily reporting)

• Filter Tableau Compliance Dashboard to display all pharmacies in ascending order of uploads (Exclude exempt pharmacies)

• Things kept in mind during analysis:
  • Is the pharmacy reporting daily, or are they submitting prescriptions or zero reports once per week, twice per week, etc.?
  • Do the zero report days fill in holes in the dispensation dates?
  • Are the zero reports submitted for timeframes of greater than one day?

• Is the pharmacy reporting daily based on Date Filled or Date Sold?
Based on analysis, insert custom response. Common text below:

- **Note, the following days are unaccounted for and must be submitted immediately:**
  - August: 5-14, 16-27
- **Note, uploads do not appear to be submitted on a daily basis. Rather, catch-up reports are submitted roughly one day per week. This is not considered to be daily reporting and must immediately be resolved.**
- **Note, the last upload the PMP received was on 9/12/19. There is no data after this date. All missing prescriptions and zero reports must immediately be submitted.**
- **Note, the pharmacy submitted 23 uploads of prescription data in the last thirty days. For a pharmacy that is open 7 days a week, the expectation is to see one upload per day (i.e. 30 uploads in 30 days).**

1st Inadeq. Reporting 2nd Inadeq. Reporting Executive Director Notice Courtesy call to Pharmacy Refer to Executive Director of BOP
Unresolved Prescription Errors

• Filter Tableau Compliance Dashboard to display all pharmacies in descending order of errors
  • Do not restrict time to one month (look at all time)
  • Save a spreadsheet of each pharmacy’s errors
  • Spot audit for error resolution
  • Include a copy of the missing prescriptions in the letter to pharmacy

1st Error Notice  ➔  2nd Error Notice ➔  Courtesy call to Pharmacy ➔  Refer to Executive Director of BOP
• Filter Tableau Compliance Dashboard to display all pharmacies who are reporting but have an exemption on file
  • Review date of exemption in Board’s licensing file
  • Rescind exemption if appropriate
Lessons Learned

Compliance requires dedicated staff, time, and resources

One missing prescription has the power to negatively impact patient care

Make a decision regarding voiding errors from Clearinghouse
Thank You!

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