

The MN Prescription Monitoring Program – Compliance in Daily Reporting

Shannon Tonn
Program Administrator

&

Brock Reed, PharmD
Controlled Substance Reporting Section Director



October 23rd, 2023

Agenda

- Reporting Requirements Minnesota Statutes Sect. 152.126
- Monthly Compliance Process
 - Prepare for Review
 - Analyze Reporting – Previous 30 days
 - Outreach to Pharmacies/Dispensers
 - Repeat

Minnesota Statutes Sect. 152.126

Daily reporting required for MN
schedule II-V controlled substances,
butalbital and gabapentin

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



A+B = Compliance!

Comparison: Licensed Pharmacies vs. Daily Submissions

Licensed Minnesota Pharmacies,
Dispensing Controlled Substances in MN



Daily Submissions to the MN PMP

Summary Errors by Pharmacy Error Details Warning Details Submission History Dispensation Dates

Summary by Pharmacy

DEA Number	Pharmacy Name	License Number
(All)	(All)	(All)
Reporting Requirements	Dispensary State	Date Type
(All)	MN	Filled

Preparation for Review

Step 1 – Active, Licensed Pharmacies

- A monthly list of current and active pharmacies from the Board of Pharmacy.
 - Information provided by the Board
 - Address, phone number
 - License Number
 - Open or Closed? (date?)
 - Days open (Closed Saturday or Sunday?)
 - Information collected by PMP (documented in Board's licensing system)
 - DEA number
 - Exemption status (no reportable drugs, OTP, inpatient only, automated dispensing machine)



Step 2 – Current PMP Compliance, Manage Pharmacies list

- A current list of reviewed reporting pharmacies is extracted from the vendor system (for MN, AWARxE Compliance, Manage Pharmacies)
 - Per Board, closed
 - Delete from Manage Pharmacies
 - Exemption Received?
 - No longer looking for reports, mark as exempt in Manage Pharmacies
 - Not found in Manage Pharmacies?
 - NEW Pharmacy, upload to Manage Pharmacies

BE
CAREFUL!

Tableau
Dashboard
reads list
from
Manage
Pharmacies

Example of Lists to Compare

Active Pharmacies from Board – Example

- License number is unique identifier for comparison
- **ABC Pharmacy** is closed Sat and Sun. Expect roughly 8 less reports per month.

Name	License Number	Opening Hours Saturday	Opening Hours Sunday	DEA Number	Type of Exemption	Original License Date	Street 1	Street 2	In State City	Out of State City	State	Zip	Home/Main Phone Number
ABC Pharmacy	123456	closed	closed	AB1234567		12/24/07	123 Saint Paul Ave		Saint Paul		MN	55102	555-555-5555
Best Pharmacy	234567			BC1234567		10/01/23	123 Minneapolis St		Minneapolis		MN	55102	555-555-5555

Current List Extracted from Manage Pharmacies – Example

- License number is unique identifier for comparison
- **Best Pharmacy** does not appear, New Pharmacy!
- **2nd Best Pharmacy** is not on the Active Pharmacy List, is it closed? If yes, delete from AWARxE Manage Pharmacies

DEA	NCPDP	Pharmacy Name	Pharmacy License Number	Address	City	State	Zip	Phone Number	Pharmacist First Name	Pharmacist Last Name	Pharmacist Email
AB1234567		ABC Pharmacy	123456	123 Saint Paul Ave	Saint Paul	MN	55102	555-555-5555			
CD1234567		2nd Best Pharmacy	345678	123 Duluth St	Duluth	MN	55102	555-555-5555			

What makes for a cleaner compliance process?

Truths:

- Minnesota Pharmacies that are not added (correctly) to AWA RxE Compliance will not appear for monthly review in the Compliance Dashboard.
- Pharmacies that have no DEA cannot be tracked through the Dashboard.
- Pharmacies that have previously been marked as exempt should not be submitting any reports of data.
- No two pharmacies will have the **same license AND DEA number**.

Dependent on getting updates from Pharmacies. If the DEA number is incorrect, the pharmacy reporting will appear non-compliant!

We do not add pharmacies that we do not have a DEA number for into Manage Pharmacies.

Exempt pharmacies with a DEA are added to Manage Pharmacies. We review them each month, looking for prescriptions reported.

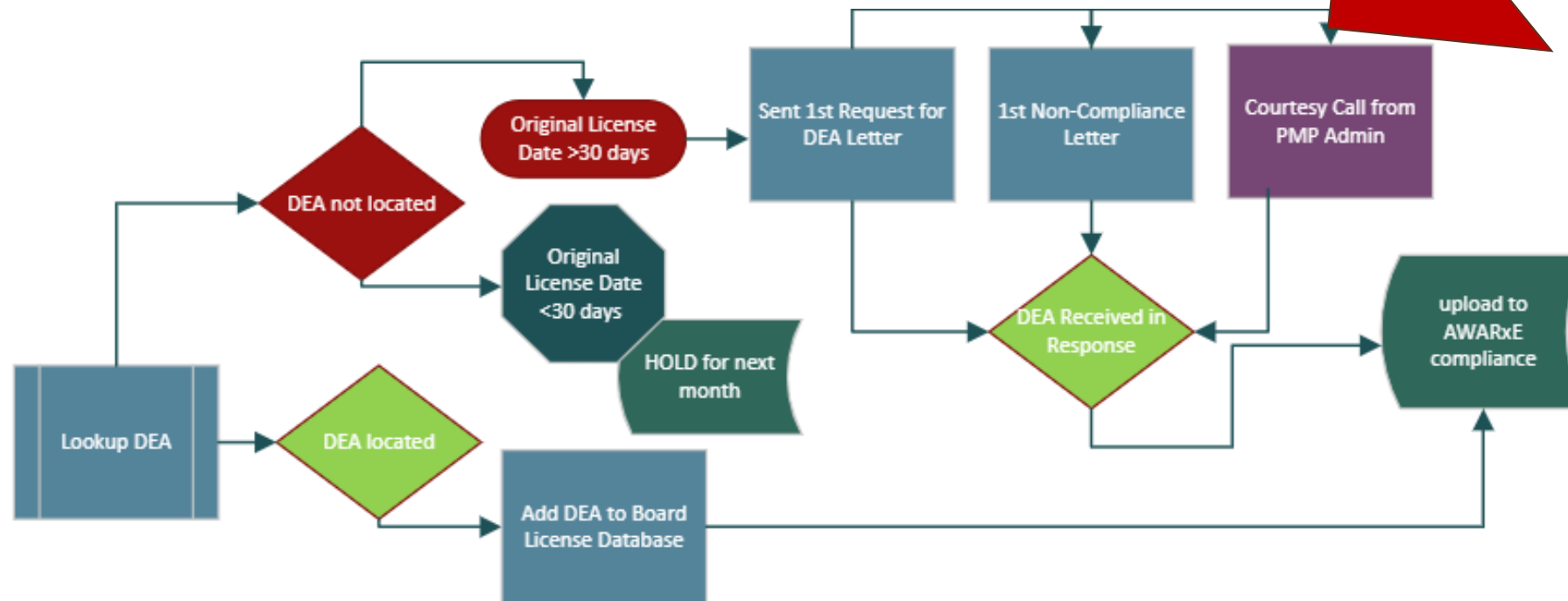
When comparing the Board list and Pharmacy list, match is based on the license number and verification is based on DEA number. (looking for updates constantly!)

Complete Information

NEXT: Resolve NEW pharmacies missing DEA number.

(BOP does not collect this with initial licensing.)

- Tools: Data lookup in Tableau, list from the DEA in Access Database.



Typically, at this point the letter is not going to the correct place, or the pharmacy is exempt and is not aware of the correct process.



Final upload of new pharmacies with
resolved missing DEAs.

then

HOLD: 2-3 days needed for list to update in
the reporting/ dashboard tool

Fields Evaluated for Daily Reporting

Regarding Dispenser

- License Number
- DEA Number
- Exempt or Not Exempt

Regarding File

- Submission Date
- Dispensation Count
- Error count
- Zero Report? Y/N
 - Start date
 - End Date

Regarding Records in File

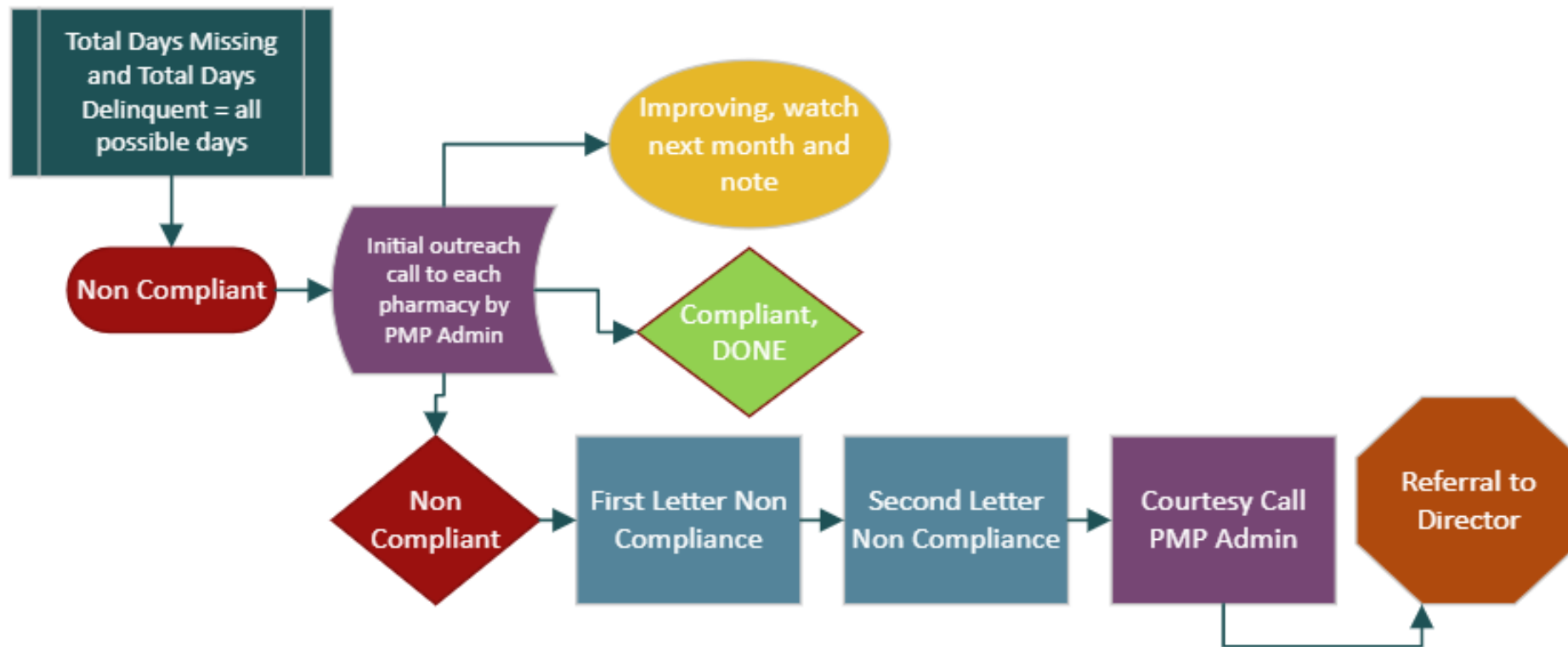
- Date sold at and/or
Date filled at

Process for Analysis

- Full list from Pharmacy Compliance extracted contains:
 - License Number
 - DEA Number
 - Name
 - Phone
 - Business hours/days
 - Error Count (last 30 days)
 - Dispensation Count (last 30 days)
 - Notes field – indicates open days during week
 - Days missing (Sold and Filled)
 - Days Late (Sold and Filled)
 - Reference to my previous (at least) 3 months notes. (Pulled from alternate data source)
- Required: Some system for keeping monthly notes regarding your compliance work.
 - Notes from previous months' activities are critical to maintain a consistent process!

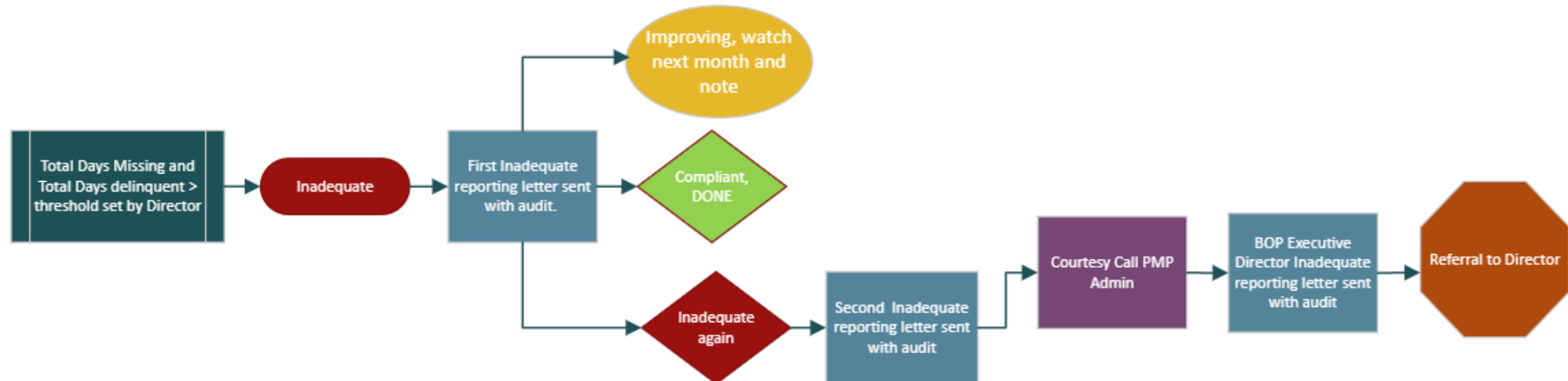
Non-Compliant in Reporting

- Pharmacies that are missing a report for EVERY DAY in the past 30 = Non-Compliant



Inadequate Reporting

- Analysis is done for the count of pharmacies that are reporting but reporting late, or missing days.
- Pharmacies listed as closed on Saturday, Sunday, or both are accommodated.



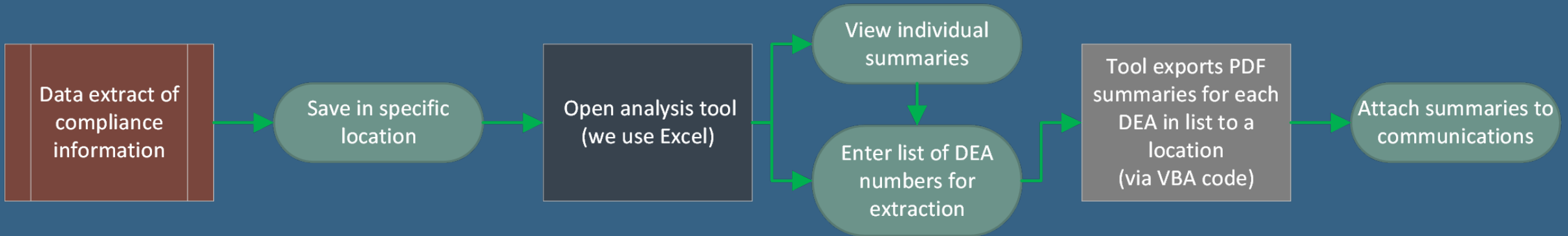
DEA Number: AB1234567
 Pharmacy Name: Shannon's Drug Hub Pharmacy
 License #: 123456

Date	Weekday	Reporting Status	Date Submitted	Dispensations Reported	Zero Report Start Date	Zero Report End Date	Days Late	Days Included in Zero
9/12/2023	Tuesday	Missing	-	0	-	-	0	0
9/11/2023	Monday	Missing	-	0	-	-	1	0
9/10/2023	Sunday	Impermissible	9/11/2023	0	9/8/2023	9/10/2023	0	3
9/9/2023	Saturday	Impermissible	9/11/2023	0	9/8/2023	9/10/2023	0	3
9/8/2023	Friday	Impermissible	9/11/2023	0	9/8/2023	9/10/2023	0	3
9/7/2023	Thursday	Compliant	9/7/2023	2	-	-	0	0
9/6/2023	Wednesday	Compliant	9/7/2023	1	-	-	0	0
9/5/2023	Tuesday	Compliant	9/6/2023	1	-	-	0	0
9/4/2023	Monday	Compliant	9/5/2023	1	-	-	0	0
9/3/2023	Sunday	Late	9/5/2023	6	-	-	1	0
9/2/2023	Saturday	Compliant	9/5/2023	1	-	-	0	0
9/1/2023	Friday	Zero Report	9/5/2023	0	9/1/2023	9/1/2023	0	1
8/31/2023	Thursday	Compliant	9/1/2023	1	-	-	0	0
8/30/2023	Wednesday	Missing	-	0	-	-	13	0
8/29/2023	Tuesday	Zero Report	8/30/2023	0	8/29/2023	8/29/2023	0	1
8/28/2023	Monday	Zero Report	8/29/2023	0	8/28/2023	8/28/2023	0	1
8/27/2023	Sunday	Compliant	8/28/2023	1	-	-	0	0
8/26/2023	Saturday	Impermissible	8/28/2023	0	8/25/2023	8/26/2023	0	2
8/25/2023	Friday	Impermissible	8/28/2023	0	8/25/2023	8/26/2023	0	2
8/24/2023	Thursday	Late	8/28/2023	1	-	-	3	0
8/23/2023	Wednesday	Compliant	8/24/2023	1	-	-	0	0
8/22/2023	Tuesday	Zero Report	8/24/2023	0	8/22/2023	8/22/2023	0	1
8/21/2023	Monday	Compliant	8/22/2023	1	-	-	0	0
8/20/2023	Sunday	Compliant	8/21/2023	2	-	-	0	0
8/19/2023	Saturday	Zero Report	8/21/2023	0	8/19/2023	8/19/2023	0	1
8/18/2023	Friday	Zero Report	8/21/2023	0	8/18/2023	8/18/2023	0	1
8/17/2023	Thursday	Missing	-	0	-	-	26	0
8/16/2023	Wednesday	Zero Report	8/17/2023	0	8/16/2023	8/16/2023	0	1
8/15/2023	Tuesday	Compliant	8/16/2023	1	-	-	0	0
8/14/2023	Monday	Zero Report	8/15/2023	0	8/14/2023	8/14/2023	0	1



Audit,
 included
 with letter

Analysis Tool



- Goal was to streamline creation of easy-to-digest summaries that can be provided to dispensers
- Uses built-in Excel features
 - Power Query to get data from extract
 - Summary uses Filter function
 - Conditional formatting to highlight rows based on criteria
 - VBA code takes a list of DEA numbers and exports PDF summaries for each

Compliant	11
Zero Report	8
Not Required	0
Impermissible	5
Noncompliant	0
Late	2
Missing	4
Total	30

Date	Weekday	Reporting Status	Date Submitted	Dispensations Reported	Zero Report Start Date	Zero Report End Date	Days Late	Days Included
8/22/2023	Thursday	Missing		0			0	0
8/23/2023	Friday	Missing		0			0	0
8/24/2023	Saturday	Impermissible	8/21/2023	0	8/18/2023	8/20/2023	0	1
8/25/2023	Sunday			0			0	0
8/26/2023	Monday			0			0	0
8/27/2023	Tuesday			0			0	0
8/28/2023	Wednesday			0			0	0
8/29/2023	Thursday			0			0	0
8/30/2023	Friday			0			0	0
8/31/2023	Saturday			0			0	0
9/1/2023	Sunday			0			0	0
9/2/2023	Monday			0			0	0
9/3/2023	Tuesday			0			0	0
9/4/2023	Wednesday			0			0	0
9/5/2023	Thursday			0			0	0
9/6/2023	Friday			0			0	0
9/7/2023	Saturday			0			0	0
9/8/2023	Sunday			0			0	0
9/9/2023	Monday			0			0	0
9/10/2023	Tuesday			0			0	0
9/11/2023	Wednesday			0			0	0
9/12/2023	Thursday			0			0	0
9/13/2023	Friday			0			0	0
9/14/2023	Saturday			0			0	0
9/15/2023	Sunday			0			0	0
9/16/2023	Monday			0			0	0
9/17/2023	Tuesday			0			0	0
9/18/2023	Wednesday			0			0	0
9/19/2023	Thursday			0			0	0
9/20/2023	Friday			0			0	0
9/21/2023	Saturday			0			0	0
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9/23/2023	Monday			0			0	0
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9/25/2023	Wednesday			0			0	0
9/26/2023	Thursday			0			0	0
9/27/2023	Friday			0			0	0
9/28/2023	Saturday			0			0	0
9/29/2023	Sunday			0			0	0
9/30/2023	Monday			0			0	0
10/1/2023	Tuesday			0			0	0
10/2/2023	Wednesday			0			0	0
10/3/2023	Thursday			0			0	0
10/4/2023	Friday			0			0	0
10/5/2023	Saturday			0			0	0
10/6/2023	Sunday			0			0	0
10/7/2023	Monday			0			0	0
10/8/2023	Tuesday			0			0	0
10/9/2023	Wednesday			0			0	0
10/10/2023	Thursday			0			0	0
10/11/2023	Friday			0			0	0
10/12/2023	Saturday			0			0	0
10/13/2023	Sunday			0			0	0
10/14/2023	Monday			0			0	0
10/15/2023	Tuesday			0			0	0
10/16/2023	Wednesday			0			0	0
10/17/2023	Thursday			0			0	0
10/18/2023	Friday			0			0	0
10/19/2023	Saturday			0			0	0
10/20/2023	Sunday			0			0	0

Settings

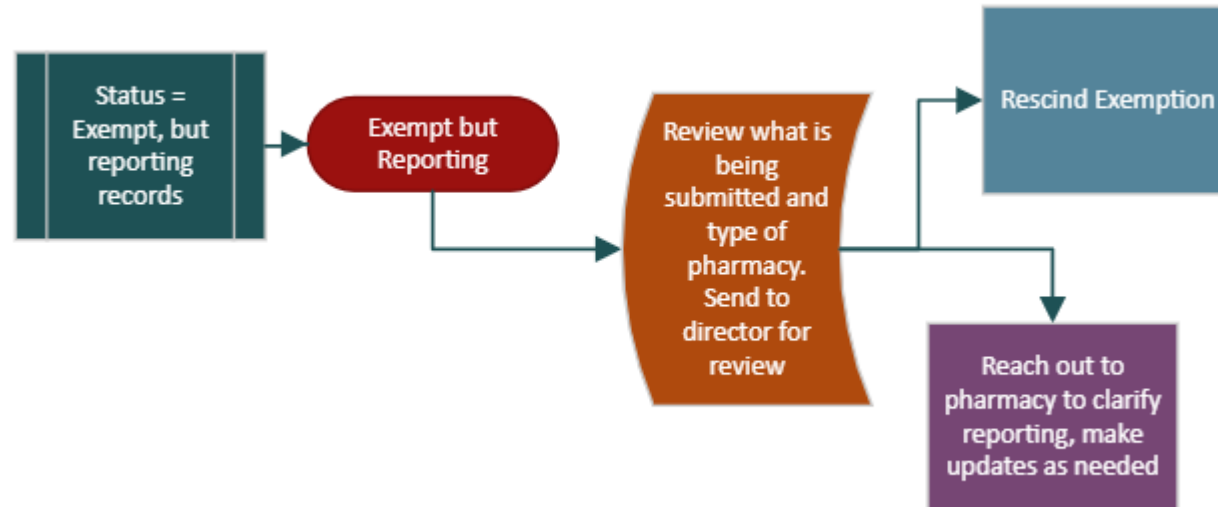
Change Blue Fields

No Report	Missing
Full compliance	Compliant
Not reported on time	Late
Not Required	Not Required
Full compliance	Zero Report
Dispensations reported	Noncompliant
Not reported on time	Late
# of days allowed per report	1
Too Many Days Reported	Impermissible

	Dispensations	Zero Report
Submission due after ___ days	1	3
Additional days allowed for Friday	3	2
Additional days allowed for Saturday	2	1

Exempt but Reporting

- Pharmacies listed as exempt, and reporting prescriptions
- Quite a few report daily zero reports – we do not address these.



Education and Follow-up



Respond to calls, letters

- Research history
- Correct Pharmacy Information
- Support Guide



Technical Assistance

True uploader account
technical assistance to
Vendor Help desk



Knowledge from Both
Sides of PMP

- Assist with complicated reporting situations
- Review referrals to Board

Data Submitter Perspective

My Background:

- Pharmacist at a LTC pharmacy for ~8 years
- Oversaw PMP data submission for ~6 years



Things to keep in mind:

- Time is precious in pharmacy; often very busy and demanding
 - Patients, metrics, immunizations, administrative duties, etc.
 - PMP reporting unlikely to be a priority over these
 - Keep communications clear, concise, and helpful
 - Give them all the information they need to fix the issue

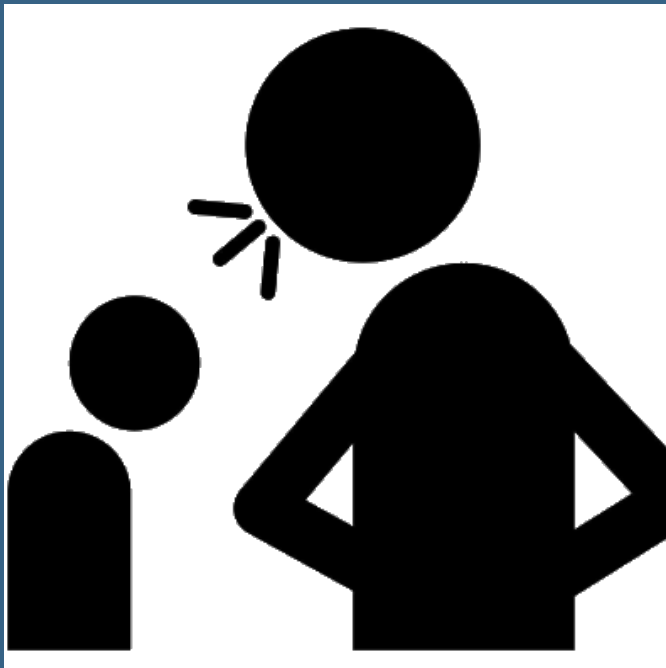
Data Submitter Perspective

- Process for reporting can vary substantially between pharmacies
 - Important to keep in mind when initial communications do not resolve issue
 - Is your communication getting to the right person/place?

	Automated Process	Manual Upload
Common cause of reporting deficiencies	Technical reasons (issue with setup)	Lack of staff time, knowledge, or awareness
Who can usually resolve reporting issues?	PDS vendor, IT staff, corporate staff (chain pharmacies)	Staff of pharmacy or corporate office (sometimes 3 rd party)

Communicating with Data Submitters

Other Considerations



- Goal is to increase compliance - not to punish
- What have we communicated and how did they respond?
 - Generally unresponsive and no improvement seen?
 - Firm language; set expectations / deadlines
 - Responsive to communications but not improving?
 - Evaluate if communicating with the right person; use knowledge of common causes of issues

- New licensing system for Board of Pharmacy

- Short Term

- Recreate our reporting capabilities to extract data we require for monthly compliance!

- Long Term

- Integrate annual exemption attestation into pharmacy renewals
- Collect DEA at licensing and verify at renewal
- Ask for PMP Reporting contacts at licensing and renewal

- Error Resolution + Daily Reporting

- Current:

- Error resolution is separate
- Performed monthly by Data Analyst
- Outreach to “worst offenders”

- Integrate communications for less than daily reporting to include errors

- Create a “Pharmacy Report Card” for Surveyors to reference during annual inspection. (Hx of timely reporting and error resolution)

For now...

- Next month, *begin again...*
- Typical Volume/ Monthly

Month-YR	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23
MN Active Licensed Pharmacies	2,098	2,107	2,105	2,103	2,101	2,138	2,005
Exempt Pharmacies	437	435	435	439	442	436	382
Potentially Reporting Pharmacies	1,661	1,672	1,670	1,664	1,659	1,702	1,623
Total Outreach (Letters, Calls, Emails)	44	20	26	15	13	28	23

Thank you!

Shannon Tonn

ph. 651.201.2841

shannon.tonn@state.mn.us

Brock Reed

ph. 651.201.2864

brock.reed@state.mn.us

Minnesota Board of Pharmacy, Prescription Monitoring Program
ph. 651-201-2836 email. minnesota.pmp@state.mn.us
335 Randolph Avenue, Suite 230, Saint Paul, MN 55102