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What is the Prescription Drug Monitoring Program (PDMP)?

The PDMP is the prescription drug monitoring program. This program is developed through legislative bills passed by the Nebraska Legislature in 2011, with system enhancements made in 2016 and 2017 (See Neb. Rev. Stat. §71-2454 thru §71-2456). The mandatory reporting of controlled substances goes into effect for all Nebraska veterinarians July 1, 2018.

What is the purpose of Nebraska's PDMP?

The purpose of the PDMP is to prevent the misuse of controlled substances and to allow for providers to monitor the care and treatment of patients for whom such a prescription drug is prescribed to ensure that such prescription drugs are used for medically appropriate purposes, as outlined by Neb. Rev. Stat. §71-2454.

Have veterinarians been involved in the PDMP reporting process?

In 2016, a Veterinary Prescription Monitoring Program Task Force was created per Nebraska law to study and make recommendations for what needs to be reported. Some veterinarians have been testing the manual reporting process and have provided feedback to streamline the reporting. Additionally, a Veterinarian Reporting Subcommittee was formed and has met to review the statute, the reporting mandates, and has provided additional feedback in preparation for reporting.

How do I comply?

Veterinarians need to report all controlled Schedule II-IV medications dispensed from their clinic to a client within 24 hours of dispensing. Controlled drugs used/administered to a patient in the clinic are not reported. Controlled drugs prescribed, but not dispensed, to a patient in the clinic are not reported.

Examples:

- Tramadol dispensed to a client is reportable.
- A prescription written for tramadol and given to a client for a patient is not reportable.
- Injectable hydromorphone used as a pre-anesthetic is not reportable.

How do I report?

To get started, veterinarians should go to the Nebraska DHHS PDMP website at <u>www.dhhs.ne.gov/PDMP</u>. You can locate the PDMP Dispenser Uploader Form by selecting "Veterinarians" then "PDMP Reporting" on the left navigation bar. By completing the "Dispenser Uploader Form", an account is set up to report your dispensed controlled substances.



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How often do I have to report?

It is required to report within 24 hours of dispensing the medication to the client. On days you do not dispense controlled substances, you do not need to report. It is encouraged, if you choose, to send a zero report.

What if I can't report or don't want to report?

By law you are required to report if you dispense any Schedule II – IV controlled substance prescriptions to patients, or the client/owner if the dispensed prescription is for an animal. If you choose not to participate you can write a prescription and have the client pick up the drug at the pharmacy of their choice. It is the responsibility of the dispensing pharmacy to report.

If you choose to not dispense any Schedule II-IV controlled substances, please complete the "Exemption Information Form" by selecting "Veterinarians" then "PDMP Reporting" on the left navigation bar. By completing the "Exemption Information Form", this notifies DHHS of your intention to not dispense or report.

Can my clinic software automatically report the prescriptions that I dispense?

Some software vendors can generate a PDMP report. You or your staff will then need to transmit the file through the PDMP portal or through free software that is capable of securely sending the data to the PDMP.

You will want to contact your clinic software vendor to determine if they can generate the report. A partial listing of vendors that are able to generate the report may be found on the NVMA website.

What if my software can't create a report to send to the PDMP?

You can manually enter the dispensed prescription information into an electronic form found on the PDMP uploading portal website (<u>https://medhx.drfirst.com</u>). An uploader account is required to be set-up prior to being granted access to the portal and subsequent forms.

Can I designate someone in my clinic to upload or send the report to the PDMP?

Yes, veterinarians can designate an individual on their staff to upload the dispensed data to the PDMP. *Example*: A veterinary technician or administrative assistant can be designated by the veterinarian to perform the daily reporting tasks.

Do I need to set-up a different uploading account for every veterinarian that dispenses at my clinic?

No, if a clinic has more than one veterinarian that dispenses controlled substances, one account can be set up to report for all the veterinarians at that clinic location. If each dispensing veterinarian would like their own uploading account, this can be set up as well.



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What information needs to be reported to the PDMP?

Client specific information:

• The name and address of the person to whom the prescription is dispensed

Veterinarian and clinic information:

• Name and DEA number of the prescribing veterinarian

Medication Information:

- The prescription number
- The date the prescription was written and filled
- Quantity
- Number of refills
- Days' supply
- The 11-digit drug NDC number without dashes (this can be found on the label bottle) *more details provided below for formatting NDC numbers

***Below is optional but encouraged information: This information helps the data received from veterinarians to be linked to the correct individual in the PDMP.

- The date of birth for the person to whom the prescription is dispensed
- The name of the animal for whom the medication is for

A full list of both required and not required information can be found in the Dispenser's Implementation Guide found on the PDMP website, under "Veterinarians" then "PDMP Reporting" on the left navigation bar.

Helpful Hints: Some veterinarian dispensers have the individual (client) receiving the dispensed medication fill out a template form for this information. This may make it easier to input the data.

Example provided in Appendix A.



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What if the individual picking up the prescription is not the owner, whose information do I report?

The name and address reported to the PDMP is the person to whom the prescription is being dispensed to.

Where do I find the NDC number?

The NDC number is generally on the front of the packaging label but can also be found on the back in some cases.

MDC 0093-2204 METOCLOF Tablets, US 5 mg Pharmacistro Guade to call R: only	PRAMIDE SP In the accompanyed on packets on
NDC 0228-4024-11 NDC 0228-4024-11 MDC 0204-11 MDC	Cisteilauted hy: Actavia Pharma, knc.
PHARMACIST: Dispense the accompanying Medication Guide to each patient.	Perspersy NO 0004 USA Rev 00/16 52-0019



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What do I do if the NDC number is not 11-digits long?

Many prescription medication packages have the NDC code displayed on the package in a 10-digit format. In order to submit successfully to the Nebraska PDMP this 10-digit NDC format will need to be converted to an 11-digit format without the dashes.

The following table shows common formats on packaging and the appropriate way to convert to the 11-digit format needed for reporting. The correctly formatted, additional "0" is in bold fond and underlined in the following example. Hyphens are provided to demonstrate the various formatting examples for the NDC.

Do not use hyphens when entering the actual data in the Nebraska PDMP. If there are any "-" or less/more than 11digits in the field, the file will come back with an error for that record.

10 -Digit Format on Package	10 -Digit Format Example	11-Digit Format	11 -Digit Format Example	Actual 10 -Digit NDC Example	11 -Digit Conversion of Example
4-4-2	9999-9999-99	5-4-2	<u>0</u> 9999-9999-99	0228-2027-10	<u>0</u> 0228-2027-10
5-3-2	99999-999-99	5-4-2	99999- 0 999-99	58284-100-14	58284- <u>0</u> 100-14
5-4-1	99999-9999-9	5-4-2	99999-9999- 0 9	60575-4112-1	60575-4112- 0 1

Helpful Hints: Some veterinarian dispensers find it helpful to keep a "cheat sheet" of the commonly dispensed drugs from their clinic next to their computers with the drug, bottle NDC, converted NDC for the PDMP, and manufacturer information on it. *Example provided in Appendix B.*

I understand that the PDMP needs a National Provider Number (NPI), but I don't have one. What do I do?

The Nebraska PDMP is recommending that you use your 10-digit phone number in the NPI field, if prompted for one. This number is used to help identify unique providers and is not shared.

Example: Phone number: 402-123-4567 would be entered in as NPI: 4021234567



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What do I do for compounded drugs?

If the compound is dispensed and does <u>not</u> include a controlled substance scheduled II-IV, the compound does not need to be reported.

If the compound is dispensed and does include a controlled substance scheduled II-IV, the controlled substance portion of the compound needs to be reported. A NDC number should be provided on the label of the compound or the base product (prior to mixing) and should be provided.

What do I do if I suspect an issue?

The PDMP does not alter the roles, responsibility or authority in prescribing or dispensing drugs. The legislation does not change what you would typically do, allowing you to follow your business or organizational policies.

Are veterinarians allowed to register to access the PDMP to view medication history?

No. At this time the information in the PDMP system includes medications prescribed to humans and this data is protected under HIPAA. Nebraska Rev. Stat. §§71-2454 through 71-2456, require veterinarians to report to the PDMP but do not require veterinarians to access (view) the data. None of the exceptions to HIPAA apply to allowing veterinarians to view prescription information about humans.

Nebraska DHHS PDMP team is planning to enhance the PDMP system with filters that will allow veterinarians to view and access the animal medication information submitted to the PDMP. Please check the <u>Veterinarian page</u> in the future for updates on the availability of this functionality (<u>http://dhhs.ne.gov/publichealth/PDMP/Pages/Vets.aspx</u>).

Who should I contact if I have questions?

General Questions about the PDMP

Davidson Wissing Prescription Drug Overdose Prevention Coordinator Nebraska Department of Health and Human Services, Division of Public Health davidson.wissing@nebraska.gov

Questions regarding PDMP Uploading and Registration

Kevin Borcher PDMP Director Nebraska Health Information Initiative (NeHII) <u>kborcher@nehii.org</u> Thank you for allowing us to serve you today!

Your pet / foster animal was prescribed a controlled substance. By Nebraska law, veterinarians are required to report any and all controlled substances dispensed to the Nebraska Prescription Drug Monitoring Program (PDMP.) As such, please fill out the following required information below. *Please note information must be that of the individual receiving the dispensed medication.*

Furthermore, per NE LB 931, Sec. 5. (1) ... "the individual shall display a valid driver's or operator's license, a state identification card, a military identification card, an alien registration card, or a passport as proof of identification."

i	irst Name (printed):	
.a	ast Name (printed):	
Da	Date of birth (MM/DD/YYYY)://	
40	Address (including City, State, Zip):	
Si	ignature of receiving party:	
	For Office Use Only:	
	ID type shown (circle one): Driver's license Operator's license Military ID	
	Alien registration card Passport Personally & Positively Known	
	ID number:	
	Animal ID # (and Pet Name if applicable):	
	Treatment #:	
	Medication dispensed:	
	NDC #:	
	Date prescribed:	
	Days' supply:	
	Date dispensed:	
	Total amount dispensed (specify unit):	
	Payment Type: Cash Card N/A Other (specify)	
	Prescribing Veterinarian:	
	Entered by: Submitted on:	

Drug	NDC #	NDC for PDMP	Manufacturer
Tramadol	57664-377-08	57664037708	Sun Pharmaceutical Industries Ltd.
Buprenorphine TM	G9064-1030-30	09064103030	Roadrunner Pharmacy MFG
Fentanyl transdermal 12mcg/hr	0406-9012-76	00406901276	LTS Lohmann therapy Systems Corporation
Fentanyl transdermal 25mcg/hr	0406-9025-76	00406902576	LTS Lohmann therapy Systems Corporation
Fentanyl transdermal 50mcg/hr	0591-3212-72	00591321272	Actavis Laboratories UT Inc.
Fentanyl transdermal 75mcg/hr			
Fentanyl transdermal 100mcg/hr	0781-7244-55	00781724455	ALZA Corporation
Midazolam	17478-524-10	17478052410	Akorn Inc.
Diazepam	0409-3213-12	00409321312	Hospira Inc.
Alprazolam 1mg tab	67253-902-10	67253090210	DAVA Pharmaceuticals Inc.
Alprazolam 2mg tab	67259-903-10	67259090310	DAVA Pharmaceuticals Inc.
Phenobarbital 16.2mg tab	0603-5165-21	00603516521	Qualitest Pharmaceuticals
Phenobarbital 64.8mg tab	51293-627-01	51293062701	ECI Pharmaceuticals LLC