Prescription Drug Monitoring Programs (PDMPs), and Their Effectiveness in Combating Controlled Substance Abuse

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What are PDMPs?

PDMPs are state run databases containing information about controlled substances dispensed within a state. Dispensers report dispensing activities electronically to the database.
How do PDMPs vary

PDMPs vary from state to state in several ways:

- The scheduled drugs which must be reported (the most comprehensive PDMPs require reporting of all Schedule II-V controlled substances dispensed).

- The funding arrangements for the programs vary.
How PDMPs Vary

- Is utilization mandatory?
- How quickly must dispensing activities be reported (real-time, 7 days, 14 days)?
- Interstate sharing.
How do PDMP programs vary?

• State PDMP programs vary in how they use the PDMP data. Some states use them to engage in active public health surveillance, including data mapping, to find out where prescribing and dispensing of controlled substances is higher than expected given the population. This information can be compared with drug-related death information to determine whether there is a correlation.
What makes PDMPs most effective?

• Required reporting of at least Schedule II-IV controlled substances. There may be delays in listing some drugs as Schedule II drugs, such as Hydrocodone.

• Stable funding for the PDMPs is essential. While it is possible to fund the operational expenses with donations, to use the data effectively for public health surveillance activities, you need adequate funding.
What makes PDMPs most effective?

• Public health surveillance activities help to uncover trends in controlled substance dispensing, prescription, and overdoses, to be more proactive in addressing emerging issues before they are more difficult to address.
What makes PDMPs effective?

• Mandatory utilization of the PDMP by prescribers and dispensers is important.
  • Helps to identify doctor shopping.
  • Helps to get a more accurate picture of the medications the patient is using – whether legitimately or not.
  • Provide can identify fraudulent use of his or her prescriptions.
What makes PDMPS most effective?

• The requirement of timely reporting is important. The jury is out on whether “real-time” reporting is necessary. Optimally, 24 hour reporting helps. Reporting within 30 days is not helpful. Providers believe that the data should be as complete and accurate as possible, which generally means more timely reporting. If the data is stale, providers argue that it is not reliable.
What makes PDMPs most effective?

- Interstate sharing of data is very important. As one doctor noted, controlled substance abuse does not stop at state lines. With the mobility of U.S. citizens, having the ability to share interstate allows one to stop individuals who travel to obtain controlled drugs.
What makes PDMPs most effective?

• Usage of (and access to) the PDMP data by or for:
  • Doctors & Prescribers;
  • Law Enforcement and Prosecutors;
  • Regulatory authorities to address inappropriate prescribing or dispensing patterns; and
  • Public health surveillance.
Emerging issues

- How do we make the use of PDMP data easier for prescribers and dispensers? How can we make it part of their normal workflow, when they prescribe or dispense controlled substances? Electronic Health Records Initiatives.

- The increase in heroin utilization as PDMPs become more effective. The trend isn’t so much related to effective PDMPs as it is to the relative price of heroin versus controlled substances.
Privacy Issues

PDMPs collect data which could be used to build an identity for identity theft purposes. This includes the full name, date of birth, and address for the individual. Some states allow or require collection of Social Security Numbers as a unique patient identifier. Doctors argue that the use of SSNs facilitates data matching.
Privacy Issues

With the recent publicity relating to the Anthem hacking problems, which reportedly go back to 2000, it is critical that PDMPs maintain data in a very secure fashion.

A physician’s employee or a pharmacy employee, armed with passwords can access the data. Need to be sure that access is appropriately restricted.
Privacy Issues

Reportedly, protected health information is more valuable than credit card information, because it can be used to build an identity.

Having said this, the status of the law is generally that the PDMP data collection and use does not violate privacy laws – but there are states that take a minority view that it does.
Privacy Issues

Having said this, the status of the law is generally that the statutorily authorized PDMP data collection and use does not violate privacy rights (whether constitutional or statutory) – but there are states that take a minority view that it does.
Privacy Issues

Have to ensure adequate security both in the PDMP and in the Electronic Health Record (and in the portal transmitting data between them). Need alternative ways to match data.
Why Are PDMPs important to AGs?

They are a powerful law enforcement tool to help combat controlled substance abuse.

With data mapping and public health surveillance activities, you can be proactive in addressing problems with controlled substances.
Questions