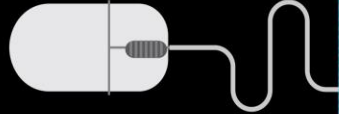




Electronic Prescribing of Controlled Substance (EPCS)

Click for Control



**Board Certified Physician Assistant
Limits and Requirements**

EPCS Click for Control Campaign - Shared Commitment

This presentation is provided through a shared commitment between Health Current, Arizona Health Care Cost Containment System (AHCCCS), Arizona Department of Health Services (ADHS) and the Arizona Board of Pharmacy to manage and coordinate the statewide EPCS *Click for Control* Education Campaign.



Overview

- Physician Assistant Responsibilities
- Prescriber and Pharmacist Responsibilities
- Controlled Substance Prescription Monitoring Program (CSPMP) Mandate and Access

Overview

- *Arizona vs. National Landscape*
- *Free On-Line CME Opportunity*
- *Click for Control Campaign Recourses*

Physician Assistant Responsibilities



Physician Assistant Limits & Requirements

Physician Assistant certified for:

- Thirty-day prescription privileges for schedule II, III, IV & V controlled substances that are opioids or benzodiazepine
- Ninety-day prescription privileges for schedule II, III, IV & V controlled substances that are not opioids or benzodiazepine

Physician Assistant Limits & Requirements

Physician Assistant shall NOT prescribe, dispense or administer:

- Schedule IV or V controlled substance more than 5 times in a six-month period for each patient.
- Schedule III-controlled substance that is an opioid or benzodiazepine that is refillable without written consent of supervising physician.
- Prescription-only drugs for a period exceeding one year.

Physician Assistant Limits & Requirements

Physician Assistant shall NOT prescribe, dispense or administer:

- Schedule II, III, IV & V controlled substances **without** delegation by supervising physician, board approval and US DEA registration
- Prescription-only medication without delegation by supervising physician
- Prescription medication intended to perform or induce an abortion

Physician Assistant Limits & Requirements

Physician Assistant **MUST**:

- Maintain up-to-date and complete log of all schedule II and III controlled substances the physician assistant administers or dispenses.
- See HB2075 Section 32-2532 for Emergency situations, MAT and dispensing guideline/mandates

Physician Assistant Limits & Requirements

All physician assistant prescription orders must contain:

- Physician assistant's name, address and phone number
- Physician assistant's US DEA registration number

Physician Assistant Limits & Requirements

Physician Assistant must have either:

- Completed 45 hours in pharmacology or clinical management of drug therapy within preceding 3 years
- Or, is certified by a national commission of physician assistants
- And, meet other requirements established by Board rule

Prescriber and Pharmacist Responsibilities



Prescriber & Pharmacist Requirements

Written schedule II-controlled substance prescription:

- Prescriber may write - Pharmacist may dispense when:
 - Electronic prescribing system is not operational
 - Pharmacy management system is not operational
 - Both must maintain record of when system(s) were not operational or available

Prescriber & Pharmacist Requirements

Written schedule II-controlled substance prescription:

- Prescriber may write - Pharmacist may dispense when:
 - Prescription orders for Federal:
 - VA facility, military base health facility, Indian Health Services hospital or other Indian Health Services facility or tribal-owned clinic patients

Prescriber & Pharmacist Requirements

Emergency situations:

- Emergency quantities of schedule II-controlled substances may be orally ordered and dispensed
- Prescriber must deliver written or electronically prepared order to dispensing pharmacist within 7 days

Prescriber and Pharmacist Limits & Requirements

- Schedule II-controlled substances:
 - May not be dispensed more than ninety days after date of prescription order
 - May not be refilled

Medical Practitioner Limits & Requirements

Beginning January 1, 2020, each prescription order must:

- Bear the name, address and federal registration number of the prescriber
- Contain only one drug per order (Hospital inpatient order may contain multiple drugs)

Medical Practitioner Limits & Requirements

- Initial schedule II-controlled substance prescription limited to a 5-day supply except:
 - Fourteen-day supply limit following surgical procedure
 - Oncology diagnosis situations
 - Traumatic injury pain management

Medical Practitioner Limits & Requirements

- Initial schedule II-controlled substance prescription limited to a 5-day supply except:
 - Hospice patient and end-of-life situations
 - Palliative and/or skilled nursing facility patient
 - Burn or MAT treatment patient
 - Infant being weaned off opioids

Pharmacist Limits & Requirements

- If authorized verbally by the prescriber:
 - Pharmacist may correct errors/omissions on written or EPCS orders to:
 - Date issued
 - Strength
 - Dosage form
 - Quantity
 - Use directions

Pharmacist Limits & Requirements

- If authorized verbally by the prescriber:
 - Pharmacist must document changes made:
 - Time/date prescriber granted authorization to correct order
 - Document on original order

Controlled Substance Prescription Monitoring Program (CSPMP)



Controlled Substance Prescription Monitoring Program (CSPMP)

What is a CSPMP?

CSPMPs are state run databases that collect patient-specific prescription information at the time of dispensing from a pharmacy

What is the purpose of a CSPMP?

Improve clinical decision-making, reduce doctor shopping, decrease inappropriate prescribing, reduce diversion of controlled substances, and assist in other efforts to curb the prescription drug abuse epidemic

Beginning October 16, 2017, Arizona prescribers are **required** to access information from the Arizona CSPMP before a prescription for an opioid analgesic or benzodiazepine-controlled substance is generated

Controlled Substance Prescription Monitoring Program (CSPMP)

Arizona Revised Statute (A.R.S.) § [36-2606 \(link is external\)](#) requires each medical **practitioner** licensed under Title 32, who possesses a DEA license to:

- Review preceding 12 months of a patient's CSPMP record **before prescribing an opioid analgesic or benzodiazepine-controlled substance listed in schedule II, III or IV.**
- Exceptions to reviewing a patient record are described in A.R.S. § [36-2606 \(link is external\)](#). Medical residents may register using the hospital DEA number and appropriate suffix. Prescribers must register [here \(link is external\)](#).

For more CSPMP information, registration and training [Click Here](#)
<https://pharmacypmp.az.gov/>

Controlled Substance Prescription Monitoring Program (CSPMP)

Ways to connect

1. Prescriber must first register with Board of Pharmacy.
2. Three options to comply:
 - a) **Access via the Board of Pharmacy Website**
 - Manual log-in of prescriber, license & patient name; available now
 - <https://arizona.pmpaware.net/login>
 - a) **Access via an Electronic Health Record (EHR)**
 - Providers should check with vendor on availability, timing & costs.
 - <https://pharmacympm.gov/integration-interest-form>
 - a) **Access via Health Current**
 - First need to be HIE participant; then need to be connected to HIE portal.

Additional Information

Please check the Health Current website Info Center for additional CSPMP information under CSPMP Mandate (RX Monitoring):

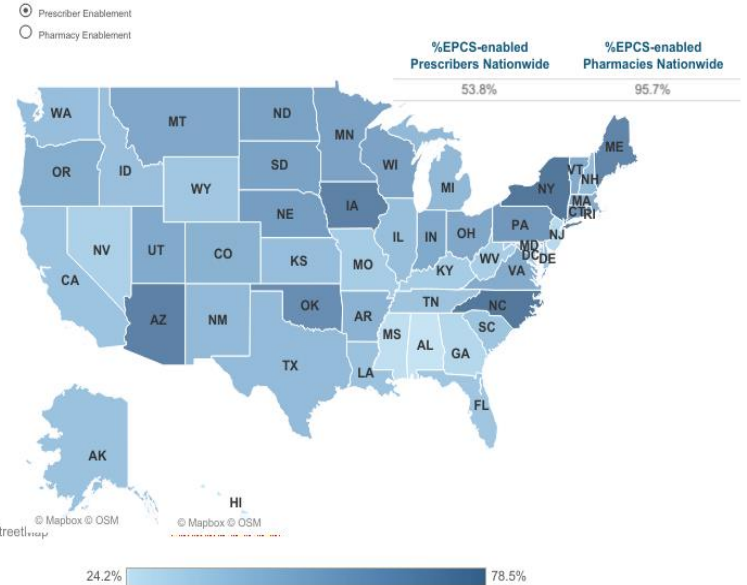
<https://healthcurrent.org/information-center/rx-monitoring-mpm/>

Arizona vs. National Landscape



As of June 2020:
Arizona Continues
4th in the Nation
 for EPCS
Prescriber Readiness

EPCS Readiness: Which States Lead the Charge?



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How Does Arizona Compare for EPCS?

National vs Arizona for EPCS (June 2020 data)

	National	Arizona
Pharmacies EPCS Enabled	97%	99%
Prescribers EPCS Enabled	51%	74%

**Virtually
ALL Arizona
Pharmacies Enabled**

**Arizona Prescribers:
23% AHEAD
of national numbers**

EPCS 2019 State Rankings

2019 Rank ▲	2018 Rank ◆	State ◆	Pharmacy Enablement ◆	Prescriber Enablement ◆	Controlled Substances Prescribed Electronically ◆
1	1	NEW YORK	98.5%	81.6%	88.3%
2	2	MAINE	99.3%	72.1%	93.0%
3	3	CONNECTICUT	99.4%	64.9%	78.2%
4	11	ARIZONA	97.8%	66.9%	66.3%
5	4	NORTH DAKOTA	98.8%	56.3%	73.2%
6	9	NORTH CAROLINA	98.5%	68.4%	47.0%
7	8	MINNESOTA	98.4%	53.3%	60.5%
8	25	IOWA	98.2%	67.3%	43.1%
9	6	NEBRASKA	98.7%	55.3%	51.6%
10	5	SOUTH DAKOTA	99.4%	52.7%	53.5%

<https://surescripts.com/news-center/national-progress-report-2019/>

Free On-Line CME Opportunity



Free Continuous Medical Education – CME Opportunity

Arizona Opioid Prescriber Education Program

FREE online training on opioid laws,
prescribing guidelines,
and Medication Assisted Treatment

AzRxEd.org

Click for Control Campaign



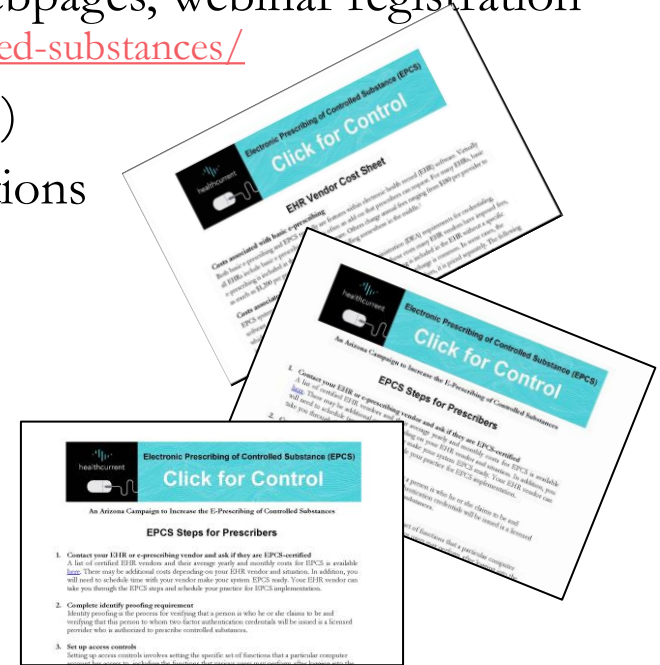
Click for Control Campaign: Resources

- **EPCS Resource Development**

- Health Current website – eRx and EPCS webpages, webinar registration <https://healthcurrent.org/information-center/controlled-substances/>
- Fact Sheets (basics to get started, FAQs, etc.)
- Future/Up-Coming Webinars and Presentations
- Newsletter and Articles
- EPCS Slides (to add to your presentation)

- **Additional Support**

- Phone based assistance
- Email communication



EPCS Click for Control Campaign 2020 Events

A Deeper Dive into HB 2075 EPCS Mandates Webinar Series

<p>Thurs., July 16, 2020 12:00 - 1:00 PM Webinar: Board Certified Physician Assistant Limits and Requirements <i>(Repeat of Apr. 29, 2020 Webinar)</i></p>	<p><u>Register Here</u></p>
<p>Thurs., Aug. 20, 2020 12:00 - 1:00 PM Webinar: Controlled Substance Prescription Monitoring Program (CSPMP) Requirements and Benefits <i>(Repeat of May 21, 2020 Webinar)</i></p>	<p><u>Register Here</u></p>

2020 EPCS *Click for Control* Campaign Webinar Series

This webinar has been presented to educate and help Arizona prescribers and practices navigate the adoption of EPCS. Attendees are encouraged to review and interpret legislation and mandates based upon their specific situations and needs.

Contact Information

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Visit the Health Current website at:

www.healthcurrent.org



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Additional Information and Resources



References

Arizona House Bill 2369 (HB2369)

<https://healthcurrent.org/wp-content/uploads/2017/04/Arizona-House-Bill-HB2369.pdf>

National House Bill HR 3528 Every Prescription Conveyed Securely Act

<https://www.congress.gov/bill/115th-congress/house-bill/3528?q=%7B%22search%22%3A%5B%22hr+3528%22%5D%7D&r=1>

Arizona Opioid Epidemic Act: [Bill text](#) and [Policy primer](#)

HB 2075, Extended deadline for Schedule II opioids to January 1, 2020 for all Arizona Prescribers More information on HB 2075 is available [here](#).

HB 2075 Regulations & Mandates Basics

- HB 2075 – Extended the EPCS Deadline for prescribing Schedule II opioid to January 1, 2020 for all Arizona
 - Removed cumbersome waiver process
 - Specified Schedule II controlled substances requirements for compounding (for direct administration), for long-term care facility residents, for hospice care patients
 - Clarified special circumstance and procedure for prescribing/dispensing during electronic system non-operational/unavailable situations
 - Confirmed Veterinarians are not required to EPCS until State Veterinary Medical Examining Board determines EPCS software is “widely” available

More information on HB 2075 is available [here](#). Information on Health Current’s 2020 *Click for Control* campaign is available [here](#).