



Prescription Drug Monitoring Program Enforcement Plan

Background and Purpose

The State of Rhode Island has been experiencing an epidemic of overdose deaths since early 2012. In 2014 alone, there were 239 confirmed drug-overdose deaths. This epidemic has claimed the lives of men and women, ages 19-62, from all walks of life, and from all over the state. Overdose deaths have occurred from illicit drugs, prescription medications, and combinations of both. Overdose deaths are preventable and the Prescription Drug Monitoring Program (PDMP) is a useful clinical tool to help prescribers to prevent drug interactions, accidental overdose, death, dependence, possible addiction, or potential diversion.

Prescribers play a vital role in recognizing disease, preventing injury, promoting wellness, and relieving suffering. Prescribers are uniquely positioned within the treatment team to recognize opioid dependence, addiction, or prescription drug misuse. Facilitating or providing appropriate treatment is also something prescribers do as they consider the entire patient and addressing the patient's needs in a comprehensive manner. Prescribers also have a responsibility to treat pain in a safe, compassionate, and evidence-based manner.

Prescribers use clinical tools every day as part of their healing art, as well as conducting a thorough history and physical exam. To better support our prescribers, the Rhode Island Department of Health (RIDOH) established the PDMP, a comprehensive electronic database of schedule II-IV medications from 2004-present. The PDMP is another clinical tool prescribers can use to supplement their history of the patient and tailor the appropriate treatment. The PDMP has been available to prescribers with a Rhode Island Controlled Substance Registration (CSR) since September 2012.

In June 2014, legislation was passed that requires all prescribers with an active CSR to register for the PDMP. In March 2015, RIDOH promulgated regulations requiring prescribers to check the PDMP prior to initiating an opioid and/or when a patient is on opioids for more than six (6) months in a 12-month period. In addition to these requirements, RIDOH strongly encouraged all prescribers to review the PDMP before prescribing any controlled substance.

Some highlights of the State's Rules and Regulations for Pain Management include:

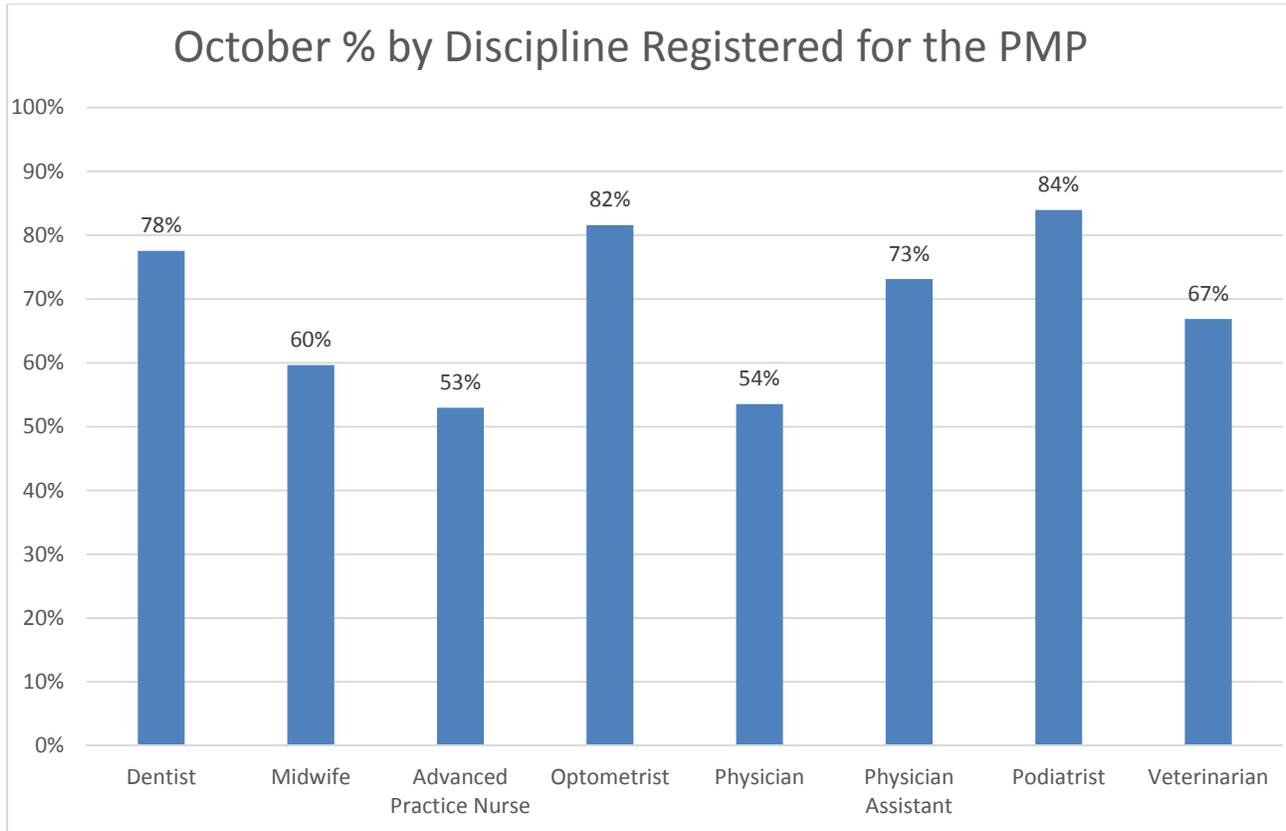
- Requirements for periodic review of the patient at least every 12 months
- Requirements for patient education that includes a focus on discouraging co-administration with benzodiazepines and encouraging urine drug tests
- Transition of care for patients dependent on opioids
- Consideration of multidisciplinary approaches to the treatment of chronic pain

Prescribers should refer to

<http://www.health.ri.gov/healthcare/medicine/about/safeopioidprescribing/> which has reliable information on safe prescribing of all controlled substances and additional CME resources.

Status of Prescriber Registration

Many prescribers are already participating with the PDMP; however, there are some significant gaps in compliance. To facilitate and further encourage prescribers who hold an active Rhode Island CSR to use the PDMP, RIDOH has simplified the PDMP registration process. As of October 2015, 59% of eligible prescribers in Rhode Island have registered to use the PDMP. The graph below illustrates the percentage of licensed professionals from each discipline currently registered for the PDMP.



Three-Phase PDMP Enforcement Policy Statement

The goal of this policy is to give adequate opportunities for prescribers to register and use the PDMP, and to phase in enforcement to assure compliance with the law. PDMP staff will engage with each eligible, but unregistered, prescriber to remind him/her of the statutory and regulatory PDMP enrollment requirements and to offer technical assistance with the PDMP registration process. The goal is to have all prescribers who hold an active Rhode Island CSR register for the PDMP. Prescribers can register at www.ripmp.com.

Phase 1: Education

- RIDOH has conducted more than 40 CME and educational programs regarding responsible prescribing, registering for, and using the PDMP. Venues have included Grand Rounds at local hospitals, Public Health Grand Rounds (available here: <http://www.brown.edu/academics/medical/education/other-programs/continuing-medical-education/online-activities/public-health-grand-rounds-webinars>) as well as Board-sponsored Risk Evaluation Mitigation (REMS) courses.

- RIDOH has also sent emails, letters, e-newsletters, and utilized mass media to alert prescribers to the PDMP and how to register for it. In response to prescriber feedback, RIDOH has also simplified registration by allowing the entire process to be accomplished online. A user guide for the PDMP has also been created for prescribers (<http://www.health.ri.gov/publications/guides/HowToUseThePMP.pdf>). The guide gives easy-to-read directions and includes illustrations about using this important clinical tool.
- RIDOH will continue to partner with prescribers to enhance the PDMP and improve the utility of this data base. Academic detailing of best practices for responsible prescribing and using the PDMP are planned for 2016 to top prescribers.

Phase 2: Notification

The purpose of this phase is to assure that all professionals who should be registered are notified that they are not registered. This will give them the opportunity to join the majority of their colleagues quickly and be able to help address the epidemic of opioid overdose in Rhode Island. There will be no punitive consequences to health professionals who register during this period.

- Beginning January 4, 2016, RIDOH will initiate the PDMP registration plan by sending a registration reminder via email (or via regular mail if email is unavailable) to prescribers who have an active CSR and have not yet registered. The message will emphasize the regulatory requirement to register, the advantages of using the PDMP, directions for registering, and a listing of additional educational resources.
- Beginning February 15, 2016, PDMP staff will send correspondence via certified mail to any remaining prescribers who hold an active Rhode Island CSR and have not registered for the PDMP. This notification shall include a clear statement indicating that the prescriber's failure to register with the PDMP will result in a referral to the prescriber's appropriate professional board.

Phase 3: Enforcement

The purpose of enforcement is to hold professionals accountable for not complying with rules and regulations and to assure that all providers can contribute to the statewide effort to eliminate opioid-overdose deaths in Rhode Island.

- As of April 1, 2016, prescribers who hold an active Rhode Island CSR and have not registered with the PDMP will be referred to the appropriate professional board.
- Subsequent sanctions: Beginning May 1, 2016, the first business day of each month, monthly audits of prescribers who hold an active Rhode Island CSR and are not registered for the PDMP shall be conducted and referred to the appropriate professional board.