

### GOVERNMENT OF THE DISTRICT OF COLUMBIA

#### The District of Columbia Prescription Drug Monitoring Program (DC PDMP) Frequently Asked Questions

#### 1. What is a Prescription Drug Monitoring Program (PDMP)?

The PDMP is an electronic database used to monitor and collect data on the dispensation of prescription data for Schedule II, III, IV and V controlled substances, as well as products containing the covered substances Butalbital, Cyclobenzaprine and Gabapentin.

The District of Columbia (DC) PDMP is designed for DC licensed prescribers and dispensers to use as a tool to support informed patient care and to reduce addiction and overdose trends within the District/Maryland/Virginia (DMV) area. There is no cost for registering or accessing the database.

## 2. How do I find laws and regulations that govern the PDMP in the District of Columbia?

District of Columbia PDMP laws and regulations, such as <u>Chapter 103</u> <u>Prescription Drug Monitoring Program</u> can be found on the DC PDMP website <u>https://dchealth.dc.gov/PDMP</u>. In addition, <u>notices</u> are posted on the website to keep providers up-to-date with new information.

#### 3. Which drugs are monitored?

Schedule II, III, IV and V controlled substances, as well as products containing the covered substances Butalbital, Cyclobenzaprine, and Gabapentin.

#### 4. Which practitioners can access PDMP data?

Physicians, pharmacists, nurse practitioners, physician assistants, dentists, veterinarians, optometrists, podiatrists, naturopathic physicians, and other licensed professionals authorized by DC Health can access PDMP data.

## 5. If I access PDMP information through a health information exchange (HIE), does that mean I am registered for the DC PDMP?

The DC PDMP is separate from health information exchanges. Please ensure that you are registered with the DC PDMP as an individual in addition to any HIEs you may use in your practice.

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#### 6. Is there a requirement to register with the PDMP?

Yes, all prescribers and dispensers who are licensed in DC are required to register with the DC PDMP. Please refer to the <u>Health Care Reporting Amendment Act of</u> <u>2020</u> for additional information.

### 7. Do prescribers and pharmacists who practice in other states or jurisdictions have to register with the DC PMDP?

Yes, all prescribers and dispensers who are licensed in DC must register with the DC PDMP, including those who practice in other states or jurisdictions. Please note that even if you have registered with a PDMP in another state, you still have to complete the registration process for the DC PDMP.

#### 8. Are retired practitioners required to register with the DC PDMP?

If a retired prescriber or dispenser still maintains a DC professional license, they must register for the DC PDMP.

#### 9. What if I don't have a DEA or NPI number?

Those without a DEA number may register as a "Prescriber without DEA". Those without an NPI number may register as "Non-Dispensing Pharmacist."

#### 10. How do I register for the DC PDMP?

You may register on the DC PDMP website: https://districtofcolumbia.pmpaware.net/login

Licensed practitioners will need the following information to complete their registration:

- DC Professional License Number (including prefix letters)
- DEA Number, if applicable (two letters followed by seven numbers)
- DC Controlled Substance Registration Number, if applicable (including prefix letters)
- Employer National Provider ID (NPI), if applicable
  - Veterinarians may enter a string of seven zeros (0000000) in place of an NPI number

After filling out your information successfully, you will be required to verify your email address. Please click the link in the automatically generated email to complete your registration.



#### 11. Is there a cost to register for the DC PDMP?

No, registration is free.

# 12. If I am a DC licensed practitioner with a DEA number but do not have a CS registration, do I need to apply for a Controlled Substance Registration in order to register with the DC PDMP?

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No, practitioners with a DEA number who do not prescribe in the District do not need a Controlled Substance Registration to register for the PDMP. Practitioners that fall into this category are able to register as "Prescriber without DEA".

#### 13. Where can I find proof of my DC PDMP registration for my own records?

If you ever need to prove that you registered for the DC PDMP, you can download your registration PDF. You can access the document in the PDMP system. Once you are logged in, click on your name in the top right corner, then click "My Profile" from the drop down list, and then click the "Download PDF" icon on the right under the DC Health logo. That PDF will include your registration information.

## 14. What if I need to update my username/email, role, DEA number, work address, or other information in my DC PDMP profile?

If you ever need to update your DC PDMP profile, please email <u>doh.pdmp@dc.gov</u> and we can assist. Do not create a duplicate profile using a new email address.

#### 15. Are prescribers and dispensers required to query the DC PDMP?

Yes, <u>D.C. Law 23-251. Prescription Drug Monitoring Program Query and Omnibus</u> <u>Health Amendments Act of 2020</u> requires prescribers and dispensers who are licensed in DC to query the PDMP for the following circumstances:

- prior to prescribing or dispensing an opioid or benzodiazepine for more than 7 consecutive days and
- every 90 days thereafter while the course of treatment or therapy continues, or
- prior to dispensing another refill after 90 days

#### 16. Are there any exceptions to querying the DC PDMP?

Yes, providers are excluded from checking the DC PDMP if the substances are prescribed or otherwise provided to a patient:

- currently receiving hospice or palliative care
- during an inpatient hospital admission or at discharge



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• in a nursing home or residential care facility that uses a sole source pharmacy

#### 17. Can I have my support staff access the PDMP for me?

Yes, a prescriber or dispenser authorized to access prescription monitoring data may delegate their authority to access the data to up to two (2) health care professionals who are:

- · Licensed, registered, or certified by a health occupations board; and
- Employed at the same location and under the direct supervision of the prescriber or dispenser.

Additional information for delegates:

Delegates must submit the Delegate Registration Form.

If the delegate becomes ineligible at any time, the program must be notified in writing within 24 hours. Registration for delegates expire June 30<sup>th</sup> of every even numbered year.

#### 18. What is the difference between writing a prescription and dispensing?

Writing or issuing a prescription is the act of giving approval for a certain medication to be dispensed to the patient by someone else. The act of dispensing refers to situations where a practitioner gives a supply of medication directly to a patient for take home use. Dispensing often occurs when a pharmacist gives a supply of medication to a patient pursuant to a prescription written by the patient's provider. Dispensing can also occur when a practitioner (i.e., physician, dentist, veterinarian, etc.) gives a supply of medication to a patient for take home use.

## 19. How does mandatory query legislation affect writing and issuing prescriptions?

This act required DC-licensed prescribers to query the DC PDMP prior to initiating treatment or therapy for a patient in the District of Columbia that includes prescribing an opioid or benzodiazepine for more than 7 consecutive days, and every 90 days thereafter while the course of treatment or therapy continues. In accordance with this requirement, a practitioner would need to query the PDMP before writing or issuing a prescription for an opioid or benzodiazepine that is intended to last the patient more than 7 consecutive days. The practitioner would need to query the PDMP again prior to writing or issuing any additional prescriptions for the same course of therapy every 90 days thereafter.

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## 20. Does the mandatory query legislation apply to patients who have already been taking an opioid or benzodiazepine prior to the effective date of the legislation?

Yes, a prescriber or dispenser must query the PDMP prior to prescribing or dispensing an opioid or benzodiazepine for more than 7 consecutive days, and every 90 days while the course of treatment or therapy continues. For example, if you are a prescriber and one of your patients is receiving continued treatment with benzodiazepines, you should query the PDMP prior to issuing the patient's next benzodiazepine prescription. After 90 days, you should query the PDMP again before writing an additional prescription, and so on.

## 21. What if I prescribe or dispense the same opioid or benzodiazepine prescription to a patient more than once within 90 days, am I required to query each time?

No but it is encouraged. You are required to query prior to prescribing or dispensing the initial prescription and then prior to prescribing or dispensing another prescription after 90 days. If you prescribe or dispense the same medication within the 90-day window, you do not need to query again. For example, if you query the PDMP and subsequently issue an initial prescription for a benzodiazepine for one of your patients and issue the same benzodiazepine prescription 30 days later, you do not need to query the PDMP before issuing the second prescription. If you continue the course of therapy and issue an additional type of benzodiazepine or a new opioid within the 90 days, you must query the PDMP again. If you continue the course of therapy and issue another prescription after 90 days from the original prescription, you must query the PDMP again.

# 22. How does mandatory query legislation apply to situations where a patient takes a medication (such as a benzodiazepine) 'as needed'? (For example, a patient that typically takes 30 Alprazolam tablets over the course of 4 months.)

If a prescribing practitioner is initiating treatment or therapy with a benzodiazepine or opioid and instructs a patient to take 'once daily as needed,' for example, the practitioner should query the PDMP prior to writing or issuing a prescription for more than a 7-day supply of opioid or benzodiazepine medication. The prescriber should query the PDMP again prior to writing an additional prescription after 90 days.

# 23. If I only prescribe less than a 7-day supply of opioid or benzodiazepine medication with no refills, am I still required to query the PDMP before writing these prescriptions?

No, but it is encouraged. The act requires DC-licensed prescribers to query the DC PDMP prior to initiating treatment or therapy for a patient in the District of Columbia that includes prescribing an opioid or benzodiazepine for more than 7 consecutive days.

All prescription monitoring data collected, maintained, or submitted pursuant to this Program is confidential, privileged, not subject to discovery, subpoena, or other means of legal compulsion in civil litigation, and is not a public record.

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## 24. Are CII stimulants considered opioids in relation to mandatory query legislation?

No, CII stimulants (Adderall, Ritalin, etc.) are not considered opioids. Prescribers and dispensers are not required (but encouraged) to query the PDMP prior to prescribing or dispensing CII stimulants. However, dispensations of CII stimulants must be reported to the DC PDMP.

# 25. If I access the PDMP using the PDMP feature within my workplace EMR (i.e., PMP Gateway connection), does this satisfy the requirement to query the DC PDMP?

Yes

## 26. If I practice outside of DC, must I still check the DC PDMP separately when issuing prescriptions for patients in DC?

Many surrounding state PDMPs have formed connections with the DC PDMP. For example, you can search the Maryland PDMP and 'check' the District of Columbia to also search the DC PDMP for a patient in DC simultaneously. This satisfies your requirement to check the DC PDMP.

## 27. If I have a DC license but do not write prescriptions or dispense medication to patients in DC, must I still query the DC PDMP?

You do not need to query the DC PDMP unless you prescribe or dispense medications to patients living in DC. You should query the PDMP of your state and include the District of Columbia in your available states to search. You are still required to register with DC PDMP if you have a DC license.

#### 28. Who is required to report data to the DC PDMP?

Each dispenser of a controlled or covered substance must submit the prescription monitoring data required in the form and manner required by to the Program within twenty-four (24) hours after a controlled or covered substance is dispensed, for each controlled or covered substance dispensed.

Any dispenser located outside the geographical boundaries of the District that is licensed or registered by the District must submit the prescription monitoring data to the Program within twenty-four (24) hours after the controlled or covered substance is dispensed to an ultimate user who resides in the District.

For assistance with integrating the PDMP into your health information exchange



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(HIE), refer to the <u>Gateway Integration</u> guidance.

For assistance with reporting data from your facility, refer to the <u>Data Submission</u> <u>Dispenser Guide</u>.

#### 29. Who has access to PDMP data?

- A prescriber or dispenser who is licensed in good standing
- Law enforcement
  - Open investigations are required, as law enforcement agencies need approval in order to query the system
  - Law enforcement personnel must submit a <u>Law Enforcement Registration</u>
    Form
  - Law enforcement personnel may query for information in the DC PDMP by completing the steps outlined in the <u>Law Enforcement Records Request Form</u>
  - Registration for law enforcement expires June 30<sup>th</sup> of every even numbered year
- Licensing and regulatory boards
- Medical examiners or coroners
- Research organizations
- An individual can request their own prescription monitoring information via the <u>Patient Self Records Request Form</u>, or their patient representative can request it via the <u>Patient Representative Records Request Form</u>

#### 30. Is PDMP data kept confidential?

All prescription monitoring data collected, maintained, or submitted is confidential, privileged, not subject to discovery, subpoena, or other means of legal compulsion in civil litigation, and is not a public record.

#### 31. What other resources and information are available?

- DC PDMP (PMP AWARxE)
- NarxCare
- Gateway Integration
- DC Health Professionals
- DC PDMP Annual Report
- DC PDMP Regulations
- DC PDMP Forms
- DCRx: The DC Center for Rational Prescribing
- <u>Centers for Disease Control and Prevention (CDC)</u>
- U.S. Department of Veterans Affairs



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#### 32. Who do I contact for questions about the PDMP?

All questions and press inquiries regarding the PDMP must be submitted in writing. Interested parties may send inquiries by email to <u>doh.pdmp@dc.gov</u> or by regular mail to:

Prescription Drug Monitoring Program Health Regulation and Licensing Administration 899 N. Capitol Street NE, 2nd Floor Washington, DC 20002