

6/6/2019

Dear Pharmacies and Software Vendors:

We are communicating the following reporting recommendations approved by the PDMP Committee at the National Association of State Controlled Substance Authority Conference in October 2018 or by the North Dakota (ND) Board of Pharmacy, Prescription Drug Monitoring Program (PDMP). If changes occur, these recommendations will be resent to all reporting parties and posted on the ND PDMP website with plenty of notice to implement new reporting practices. They ensure data accuracy and common reporting practices across state borders, which will increase the chances of PDMP user's ability to locate a patient in or out-of-state when performing a search. Please pass these recommendations on to any party involved in the data entry and dissemination processes.

ND PDMP Reporting Recommendations:

1. Prescriptions containing required reporting field errors must be corrected in the PDMP as soon as possible or within 24 hours.
2. Pharmacies and their vendors must have an understanding and process in place for the following:
 - The Pharmacy must receive information regarding prescriptions which contain invalid or missing data fields that reject or load with errors on a regular reporting day;
 - Revise the erroneous record(s) in their computer system;
 - Report revisions, voids, or new prescriptions to the state PDMP, as indicated
3. Pharmacies must not insert comments or middle names/initials in the patient's first name, last name, or address fields. This superfluous information may be carried over into the patient's profile in the PDMP impacting the end user's ability to locate the patient record as well as impact interstate sharing and data consolidation.
4. When reporting to PDMPs, the state address field should be populated following the jurisdictions listed in Appendix A in ASAP Version 4.2A, especially for international patients, unless otherwise defined by the state. For international patients, the zip code address field should be populated with zeros. If the state address is not listed in Appendix A, then 99-Other should be utilized.
5. Report zip codes in a 5 or 9 digit format and should not include a dash when reporting to state PDMPs. Following this format will prevent errors in the file. Populate with zeros if the patient address is outside the U.S. The state address field has been sized to handle international patients not residing in the U.S.

6. Dispensers should not report a prescriber's Data 2000 Waiver number (also commonly referred to as an "X" DEA number) in ASAP field PRE02, Prescriber DEA number. Only the prescriber's primary DEA registration number should be reported in PRE02. ASAP field PRE09, "X" DEA Number, is a separate field where Data 2000 Waiver numbers can be reported if required by the state (not currently required in North Dakota). The Data 2000 Waiver number is not interchangeable with the prescriber's DEA number when reporting to the PDMP.
7. Verify both the prescriber's DEA number and name on the prescription when processing controlled substance prescriptions. This ensures correct prescriber information displays on the PDMP report.
8. In regards to reporting compounds, only controlled substance ingredients should be reported to the state PDMP unless further specified by the state. Only the quantity of the controlled substance ingredient utilized in the compound should be reported to the state PDMP.
9. When reporting the quantity prescribed/dispensed and drug dosage unit code, the unit of measure and quantity should be consistent with the formulation of the product. "Milliliters" should be utilized when the product is measured by volume. "Grams" should be utilized when the product is measured by weight. "Each" should be utilized for indivisible packages, solid dosage units, or when weight and volume measurement are not applicable. Dispensers are encouraged to review NCPDP's Billing Unit Standard or examples outlined in ASAP Standards. <https://www.ncdp.org/Standards-Development/Billing-Unit-Requests>
10. When providing a partial fill of a medication, the partial fill indicator, must be utilized when reporting to the state PDMP. This should not be confused with the Refills Authorized or Refill Number fields.
11. For veterinary prescriptions, a separate patient account/profile is created within the pharmacy software containing the animal/pet owner's name in the First Name (PAT08) and Last Name (PAT07) fields and Date of Birth (PAT18), under Species Code (PAT20) enter/select "Veterinary Patient" and under Name of Animal (PAT23) you enter the pet's name (ex. Fido or Fifi). Remember to use the owner's date of birth in the Date of Birth (PAT18) field, not the animals. Next, if you have a Middle Name (PAT09) field in your software you can enter "dog" or "cat".
12. Dispensers are encouraged to maintain current contact information, including email address, in the data submitter or uploader's account. <https://pmpclearinghouse.net>
13. Dispensers are reminded of the two-digit entry limit when reporting the refill number (DSP04) or number of refills authorized to the PDMP. The two-digit entry limit conforms with both ASAP and

NCPDP's format. If there are refills, entering 00 (zero) is incorrect and will show -1 (negative one), -2 (negative two), and so on when submitted refills for the same prescription.

14. Unless further required or defined by the state, dispensers are encouraged to utilize point of sale reporting to state PDMPs. Software permitting, dispensers should report the date in which the prescription was sold or picked up/delivered to the patient. States should, at a minimum, make the "Date Sold" field (DSP17) a "situational" field and display it to end users of the data with a disclaimer that the field may or may not contain data pending the dispenser's ability to report at point of sale.
15. Controlled Substance transfers of stock, or sales to other DEA registrants, should not be reported to the PDMP database or assigned a prescription number. Instead, create an invoice for the sales of stock, adjust your inventory, and fill out the proper DEA forms (222) documenting the transfer.

Thank you for your adoption of these recommendations. For further questions, you can locate a list of the ASAP Specifications at <https://www.nodakpharmacy.com/pdfs/AWARxEmanual.pdf> on page 23 of the Data Submission Dispenser Guide. You may also refer staff to a copy of this available on the ND PDMP website at <https://www.nodakpharmacy.com/PDMP-index.asp>, labeled "Reporting Recommendations Letter".

If you, your staff, or vendors have questions on the reporting recommendations, please send an email with your contact information and question to Kathy Zahn at pdmp@ndboard.pharmacy.

Regards,

Mark Hardy, PharmD, Executive Director