



Prescription Drug Monitoring Program Training and Technical Assistance Center

Technical Assistance Guide

No. 02-14

Recommended PDMP Reports to Support Licensing/Regulatory Boards and Law Enforcement Investigations

This project was supported by Grant No. 2011-PM-BX-K001 awarded by the Bureau of Justice Assistance. The Bureau of Justice Assistance is a component of the Office of Justice Programs, which also includes the Bureau of Justice Statistics, the National Institute of Justice, the Office of Juvenile Justice and Delinquency Prevention, and the Office for Victims of Crime. Points of view or opinions in this document are those of the author and do not represent the official position or policies of the U.S. Department of Justice.



BJA
Bureau of Justice Assistance
U.S. Department of Justice

Brandeis University The Heller School
For Social Policy and Management

Telephone: (781) 609-7741 | Fax: (888) 705-8053 | Email: info@pdmpassist.org | Website: www.pdmpassist.org

June 26, 2014

Purpose

The increased use of PDMP reports by licensing/regulatory boards (hereafter referred to as boards) and law enforcement agencies provides an opportunity for PDMPs to work more closely with the board and law enforcement community to ensure they are properly trained in requesting and using PDMP reports. Furthermore, it provides an avenue in which PDMPs can engage in a dialogue with these agencies on ways the reports can best serve their needs. The PDMP Training and Technical Assistance Center (TTAC) developed the '[PDMP Program Administrators Guide for Training Law Enforcement](#)' to aid in developing such a training program.

PDMP data can be invaluable to investigators, however, it is important to remind investigators that the data reflect only what was reported to the PDMP and, at times, may be incomplete or inaccurate. Investigators must be made aware that the prescription reports are simply tools to further the investigation. By themselves, the reports are not proof of a violation; however, these reports can assist investigators in obtaining the necessary proof or evidence.

This Technical Assistance Guide (TAG) is intended to provide suggestions and ideas for PDMPs to consider when creating and disseminating PDMP information to boards and law enforcement agencies. This TAG is the product of a work group comprised of PDMP administrators and convened by TTAC. The work group consisted of PDMP administrators from California, Florida, Idaho, Maine, and Oklahoma with input from board and law enforcement investigators with whom they work. The task of the work group was to:

- Identify which data fields may be included in a report (**Section I**)
- Detail report types and content (**Section II**)
- Identify various report output options (**Section III**)

In this TAG, the word 'investigation' not only refers to the gathering of information and evidence in an attempt to prove or disprove a fact, but also the resulting prosecution or disciplinary action that may occur. Therefore, these reports are beneficial to boards and law enforcement agencies as an asset for investigating and prosecuting cases. As a lead-in to the work group recommendations on report fields, formats and output, the TAG provides information on the value of PDMP data to boards and law enforcement and the importance of partnering with these agencies to address prescription drug abuse and misuse.

Background

To respond effectively to the prescription drug abuse epidemic, no single agency or discipline (i.e., health department, health care professional, medical/pharmacy board, or law enforcement) is sufficient. Rather, it takes the combined efforts, resources and collaboration of all stakeholders to significantly impact the abuse and diversion of prescription drugs.



The boards and law enforcement agencies play a crucial role in reducing the nation’s prescription drug epidemic and protecting public safety. The duties and responsibilities carried out by these agencies supplements the work of others, including public health agencies, prevention and treatment programs, and health care professionals. When boards and law enforcement agencies carry out an investigation into inappropriate or unlawful prescription drug activity by individuals or health care professionals, access and use of PDMP information becomes a useful, effective and efficient tool. PDMP reports assist the agencies in gathering information, evidence, and bringing investigations to a successful conclusion. In fact, PDMP reports not only assist in gathering evidence against someone, but can assist to exonerate a subject of an investigation. This has been particularly true in investigations of a prescriber or dispenser.

Of the forty-eight (48) states and one (1) territory with operational PDMPs, forty-eight (48) PDMPs permit law enforcement access and forty-five (45) PDMPs permit board access. Nebraska does not permit law enforcement access; Connecticut, Minnesota, Nebraska and Pennsylvania do not permit board access.

The types of reports needed by a board or law enforcement investigator may, at times, be more diverse than those provided to prescribers and dispensers. While prescribers and dispensers generate the majority of PDMP requests, PDMPs are experiencing a steady rise in the number of reports requested by boards and law enforcement. This is due to several factors, including the ever-increasing prescription drug problem and the recognition of the utility of these reports by these agencies. The boards and law enforcement have reported that the use of PDMP information increases investigative efficiency, lowers investigative costs, results in faster retrieval of original prescription records, validates information provided by other sources, confirms the reliability and accuracy of information sources, assists in asset forfeiture, and identifies other potentially involved participants during the course of an investigation.

PDMP WORK GROUP RECOMENDATIONS

Section I - DATA FIELDS

For purposes of this TAG, the work group identified certain data fields which may assist boards and law enforcement agencies. The fields have been organized into five (5) categories: **Patient, Prescriber, Dispenser, and Dispensing Record**. If available, appropriate, and allowed by statute or regulation, the below **bolded** data fields for each of the categories are recommended to be included in the reports.

1. Patient

Recommended Fields

Patient's name

Address

Date of birth or age

Telephone number

Gender

Identification number (presented when picking up the medication)

Name and identification number of the person (if different from the patient dropping off the prescription or picking up the medication is captured)

2. Prescriber

Recommended Fields

Registration number (e.g., DEA controlled substance registration number, state controlled substance registration number, state licensing board number, or National Provider Identifier)

Prescriber's name

Prescriber **address**, and, in some cases, **telephone number**

Prescriber's license type, Prescriber's specialty

3. Dispenser

Recommended Fields

Registration number (e.g., DEA controlled substance registration number, state controlled substance registration number, state licensing board number, or National Provider Identifier)

Dispenser's name (i.e., pharmacy name or in the case of a health care professional dispensing out of his/her office the name of the health care professional)

Dispenser's address, and, in some cases, **telephone number and name of the pharmacist**

4. Dispensing Record

Recommended Fields

Name of drug, drug strength, and drug form

Quantity written

Quantity dispensed

Day's supply dispensed

Date(s) written, filled, and dispensed,

Pharmacy assigned prescription number

Method of payment

New issuance or a refill and the **number of refills**

Type of prescription (written, oral, electronic, fax, emergency)

(See Appendix A for a summary of the recommended data fields by each segment)

Section II – REPORT TYPES

Investigations vary depending upon the alleged violation, complaint or the person or profession being investigated. Consequently, the types of PDMP reports necessary to support and further the different types of investigations vary also. Listed below are various report types and descriptions, and for which types of investigations the reports are useful. This list is not intended to be exhaustive, rather to describe the more common reports and, ideally, act as a catalyst for the development of others.

1. Patient Report

Uses

- Doctor shopper investigations
- Identification of altered prescriptions and fraudulent prescriptions
- Prescription drug diversion investigations
- Identification of organized prescription forgery activity
- Monitoring patient's compliance with terms of probation or parole
- Drug court proceedings and adjudication
- Identification of possible instances of identity theft involving controlled substances
- Detection of new addresses or telephone numbers for an individual from a prescription
- May be used by boards as a mechanism to determine if a licensee is misusing prescription drugs or in compliance with Professional Assistance Program restrictions

2. Prescriber Report

Uses

- Investigations of inappropriate, unsafe, or unlawful prescribing that may put patients at risk for overdose* or other negative outcomes
- Identification of possible 'pill mills'
- Detection of instances of potential insurance fraud
- Recordkeeping violations
- Location of lost or stolen prescription pads
- Identification of organized prescription forgery activity confirming the identity of patients
- Confirmation of adherence to board actions and professional assistance programs
- Confirmation as to whom a medication was prescribed

3. Dispenser Report

Uses

- Investigations of inappropriate, unsafe, or unlawful dispensing that may put patients at risk for overdose* or other negative outcomes
- Identification of unlawful dispensing indicating illegal involvement with 'pill mills'
- Detection of instances of insurance fraud
- Detection of theft or loss of controlled substances
- Compliance with recordkeeping requirements
- Identification of organized prescription forgery activity by confirming the identity of patients
- Confirmation of adherence to board actions
- Validation of compliance with prescription reporting requirements
- Facilitation of controlled substance inventory audits
- Confirmation as to whom a medication was dispensed or delivered

4. Prescriber/Dispenser-City-State Report

Uses

- Support documentation for investigations of inappropriate prescribing or dispensing
- Identification of 'pill mills'
- Detection of unsafe prescribing or dispensing that may put patients at risk for overdose* or other negative outcomes

5. Specific Drug or Drug Combinations Report

Uses

- Investigations of inappropriate prescribing or dispensing
- Identification of 'pill mills'
- Detection of instances of insurance fraud
- Identification of patients at risk for overdose* and the involved prescribers and dispensers
- Beneficial in identification of potential problem areas for resource allocation or case initiation

* For information about determining overdose risk, please refer to the Technical Assistance Guide ['BJA Performance Measure Guide to Calculate Daily Morphine Milligram Equivalents \(MMEs\)'](#).

6. Geographical Report

Uses

- Investigations of doctor shoppers
- Identification of 'pill mills'
- Identification of potential problem areas for resource allocation or case initiation

7. Leading Prescribers/Dispensers Report

Description

Uses

- Investigations of inappropriate prescribing or dispensing
- Identification of 'pill mills'
- Identification of potential problem areas for resource allocation or case initiation

8. Statistical Report

Description

A statistical compilation of a registrant's prescribing/dispensing, a patient's prescription history, controlled substances prescribed or dispensed, or usage by medication.

Uses

- Support documentation for any investigation

9. Trend Analysis Report

Description

A statistical compilation of controlled substance prescriptions over a period of time. This report can be combined with the geographical report to produce regional or county drug trends and provide an early alert to potential problems with a particular drug(s) in a certain part of the state. It can be used as intelligence for local law enforcement officials as to where to focus their resources.

Uses

- Identification of changes in prescribing or dispensing rates for either the State or a specific registrant
- Identification of potential problem areas for resource allocation or case initiation

10. Ad Hoc Report

Description

Reports created and customized to support a specific investigation with user-defined parameters.

Uses

- Useful in any investigation

(See Appendix B for a summary of the reports by investigation type and responsible)

Section III - Report Output

The method by which the information is provided to investigators should conform to existing statutes, regulations, and policies to ensure security and confidentiality. It is important to remember that confidentiality refers not only to the PDMP information, but to the investigation as well. As with any disclosure of PDMP data, disclaimers about the authorized uses of the information should be included. It is important to note that not every PDMP allows reports to be printed or exported. Listed below are various methods used to provide PDMP information to investigators detailing their advantages and disadvantages.

1. Paper or Hard Copy

Description

A report saved in portable document format (.pdf) or the document itself. It is recommended that PDMPs retain information about the report request or a copy (electronic or original) of the report to resolve any questions that may arise if the data was updated subsequent to the report's generation.

Strengths

- 'Official' document that could be certified by custodian of records for use in board hearings or as an exhibit in court
- PDMP information is not editable which prevents inadvertent editing the data or compromising the integrity of the report's data

Weaknesses

- Investigations can involve multiple subjects and a large amount of data so the time and cost to generate and send document can be great
- Layout or format of the information may not be optimal for supporting an investigation or conducive to data analysis
- Available document size may not allow for all data fields to be included

2. Text File

Description

Strengths

- Information could be imported into law enforcement or board computer application (i.e., database or spreadsheet) and could be merged with other investigative information
- Computer application would allow investigator to sort or display the information to suit the investigation
- Format allows for all data fields to be included

Weaknesses

- Importing and organizing non-static data may result in inadvertent editing of the data

A report saved as text (.txt) or comma-separated value (.csv) format.

3. Spreadsheet

Description

A report saved in columns and rows (e.g., Microsoft Excel).

Strengths

- Information could be imported into law enforcement or board computer application and could be merged with other investigative information
- Spreadsheet allows investigator to sort or display the information to suit the investigation
- Format allows for all data fields to be included

Weaknesses

- Importing and organizing non-static data may result in inadvertent editing of the data.

4. On-Line Standardized

Description

Pre-built queries with set fields to retrieve PDMP information.

Strengths

- Enables rapid retrieval and display of information
- Enables review of information to determine which subjects are pertinent to investigation before requesting an 'official report'
- PDMP staff not burdened with generating data

Weaknesses

- Pre-built queries may not be sufficient for scope of investigation
- Screen size limitations may not allow for all data fields to be included

5. On-Line Customized

Description

User selects fields to use in queries to retrieve PDMP information.

Strengths

- Enables rapid retrieval and display of information
- Enables review of information to determine which subjects are pertinent to investigation before requesting an 'official report'
- PDMP staff not burdened with generating data
- User can tailor the queries to suit scope of investigation
- Data output can be limited to just pertinent information
- Information can be arranged and packaged in best format

Weaknesses

- Development of a customized query tool or purchase of 'smart' query software may be cost prohibitive
- User training would necessitate PDMP staff time or development of an online tutorial

NOTE: Due to the variations in PDMPs capabilities and states' statutes and regulations, aspects of this guide may not be applicable to every PDMP. We are also aware that not all PDMPs require some of the fields mentioned in the TAG.

Appendix A – Recommended Data Fields by Segment

CATEGORY	DATA FIELDS
Patient	Name
	Address
	Date of Birth or Age
	Telephone Number
	Gender
	Identification Number
	Name of Person Dropping Off Prescription or Picking Up Medication
	Identification Number of Person Dropping Off Prescription or Picking Up Medication
Prescriber	Registration Number(s)
	Name
	Address
	Telephone Number
	License Type
	Specialty
Dispenser	Registration Number(s)
	Name of Pharmacy/Dispenser
	Address
	Telephone Number
	Name of Pharmacist/Dispenser
Dispensing Record	Quantity Prescribed
	Quantity Dispensed
	Days Supplied
	National Drug Code (NDC)
	Date Issued
	Date Filled
	Date Dispensed
	Prescription Number
	Method of Payment
	New Issuance or Refill
	Number of Refills
	Type of Prescription

Appendix B – Reports by Investigation and Agency Type

Investigation Types	Report Types									
	Patient	Prescriber	Dispenser	City/State	Specific Drug(s)	Geographic	Leading Prescribers/Dispensers	Statistical	Trend Analysis	Ad Hoc
Analysis of prescribing or dispensing activity		X	X	X	X		X	X	X	X
Compliance investigation	X	X	X					X		X
Controlled substance inventory audit			X					X		X
Court proceedings or adjudication	X							X		X
Doctor shopper investigation	X					X		X		X
Diversion investigation	X							X		X
Fraud investigation		X	X		X			X		X
ID of altered or fraudulent prescriptions	X							X		X
ID of at-risk patients		X	X	X	X			X		X
ID of prescription forgery	X	X	X					X		X
ID of geographic problem areas					X	X	X	X	X	X
Identity theft investigation	X							X		X
Loss/theft of prescription pads		X						X		X
Patient or suspect identification	X	X	X					X		X
Pill mill investigation		X	X	X	X	X	X	X		X
Recordkeeping violations		X	X					X		X
Theft/loss of controlled substance			X					X		X

Board
Law Enforcement
Board or Law Enforcement