

Topics Covered Today

- 1) Indiana Controlled Substance Registration (CSR)
- 2) DEA Registration
- 3) Purchasing Controlled Substances
- 4) Inventory Control
- 5) Required Record Keeping
- 6) Reporting Controlled Substances to INSPECT

Definitions

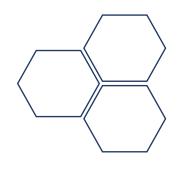


Prescribing: A registered Physician, Dentist, Veterinarian or any other person licensed by law to prescribe drugs, provides a written order containing instructions for preparation and dispensing to the Pharmacist along with mode of administration for the patient.

Dispensing: The preparation, packaging, labeling, record keeping, and transfer of a prescription drug to a patient or an intermediary, who is responsible for administration of the drug.

Practitioner: Physician, dentist, veterinarian, podiatrist, nurse practitioner, pharmacist, hospital, or other institution or individual licensed, registered, or otherwise permitted to distribute, dispense, conduct research with respect to, or administer a controlled substance in the course of professional practice.

CONTROLLED SUBSTANCE REGISTRATION INFORMATION FOR VETERINARIANS



- Applicants must have an active Indiana veterinarian license before they can obtain an Indiana CSR.
- A veterinarian must hold one CSR in order to prescribe, administer or dispense controlled substances in the State of Indiana.
- An additional, separate CSR registration is required for each practice address at which a veterinarian physically possesses controlled substances to administer or dispense.
- A separate registration is NOT required for each place where a veterinarian merely prescribes controlled substances.

Drug Enforcement Administration



Practitioners may apply for the Drug Enforcement Administration (DEA) registration after their Indiana CSR is issued by going to their website (http://www.deadiversion.usdoj.gov/)

If you have further questions, you may contact the DEA at (317) 226-7977.

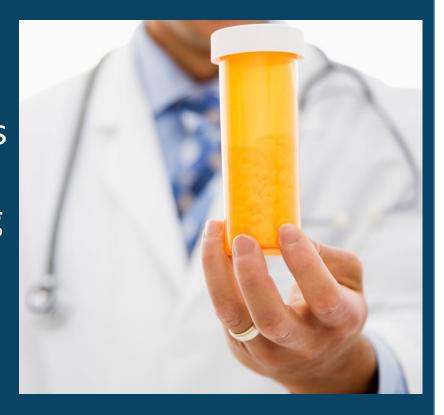
Administering and Dispensing vs. Prescribing

Administering & Dispensing Controlled Substances



The use of one DEA number by all practice Veterinarians is permitted for ordering, administering and dispensing controlled medications, but not for prescribing them.

CFR 1301.22(b)



Prescribing Controlled Substances





An individual DEA registration is required for each Veterinarian who prescribes controlled medication.

Medications are prescribed when a veterinarian gives a written authorization to a client to be filled at a third party pharmacy, or when a veterinarian provides oral instructions directly to a third party pharmacy on a patient's behalf.

Purchasing Controlled Substances

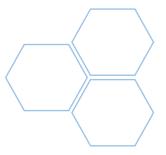
Drug Enforcement Administration



Some veterinary practices use one DEA registration number to order controlled substances for all veterinarians in the practice.

In this case, the DEA registrant must comply with state and federal controlled substance laws and also insure that anyone using controlled substances ordered under his or her DEA number is also compliant.

Drug Enforcement Administration



The registrant is also responsible for tracking all controlled substances administered or dispensed, as well as monitoring that controlled substances are stored in a secured, locked cabinet.



Inventory Control

Record Keeping Requirements



Records for Controlled Substances Received

Schedule II controlled substances must be logged on a separate sheet

schedules III-V may be logged together.

Controlled Substance Disposition Record

Name Of Drug: FATAL PLUS Strength: Size: 250 ML Page #: 2

Date	Time	Type Of Animal	Property Of	Initial Amount	Amount Used	Balance	Control#	Comments
4/16/17	1400	RACCOON	UTTLE FAUS	205	2.0	203	0026	SICK
	1900		CUFTON	203	2.0	201	c038	PERVET
611		BIRD	CUPTON	201	0.5	200.5	0035	NB
	1430	GOOSE	CUFTON	200.5	2.5	198	0037	INJURED
5/4/17	2/00	PITBULL	STR	198	6.0	192	D063	BITE CASE
5/18/17	2100	VORKIE	Fos	192	2.0	190	D076	oco/sickey
5/15/17	2115	maripod	Fos	190	2.0	188	0075	AGGRESSIVE
5/12/17		BIRD	CUFTON	188	0.5	187.5	0042	INTURED
5/19/17	1030	BIRD	CUPTON	187.5	0.5	187	0049	INTURED
5/19/17	2130	SAUIRCEL	CULTON	187	1.5	185.5	0051	WIVEED
5/20/17	1400	RACCOON	LITTLEFALLS	185.5	1.5	184	0052	INJURES
21	7	PITBULL	FOS	184	5.0	179	D094	WILD
5/26/17		KITTEN(S)	FOS	179	2.0	177	C074 C075	POS RINGWORD

Inventory Records



Each Inventory must contain the following information:

- Whether the inventory was taken at the beginning or close of business.
- Names of controlled substances.
- Each finished form of the substances (e.g., 100 milligram tablet).
- The number of dosage units of each finished form in the commercial container (e.g., 100 tablet bottle).
- The number of commercial containers of each finished form (e.g., four 100 tablet bottles).
- Disposition of the controlled substances.
- It is important to note that inventory requirements extend to controlled substance samples provided to practitioners by pharmaceutical companies.

Reporting Controlled Substances to INSPECT

INSPECT's Technology Systems

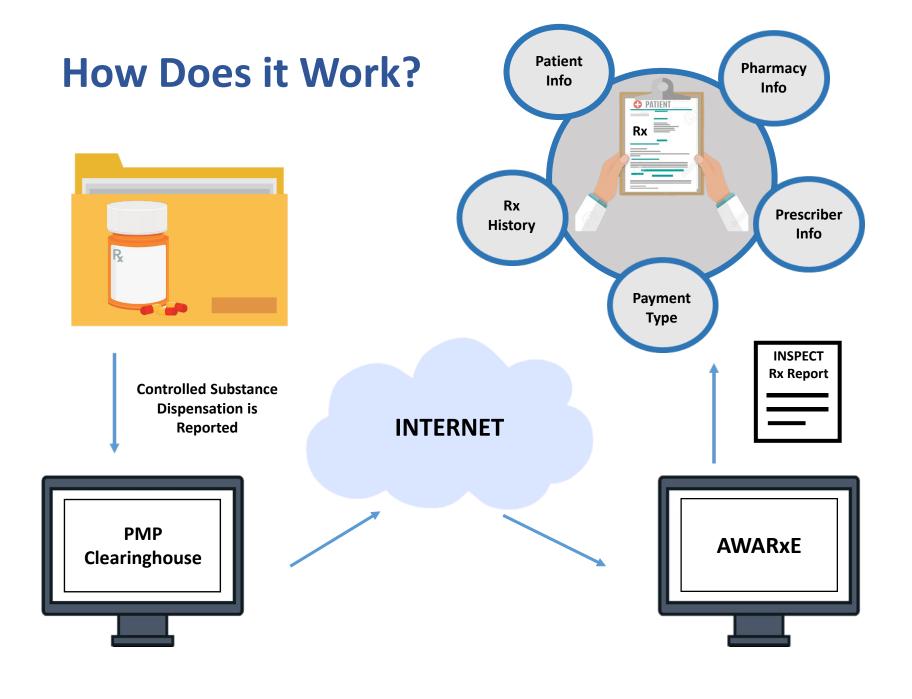


1) PMP Clearinghouse

- PMP Clearinghouse is a portal used by pharmacists and dispensing practitioners for reporting controlled substance dispensations to State PDMPs.
- Only the organization providing a medication to the patient will report to Clearinghouse. Prescriptions (written, electronic, oral) filled at a pharmacy would be reported by the pharmacy.

2) PMP AWARXE

- PMP AWARXE is Indiana's Prescription Drug monitoring platform, which collects dispensation data from the clearinghouse and stores the information in a format that is available to healthcare practitioners for the purpose of viewing their patient's controlled substance prescription history.



Reporting Requirements for Dispensing Physicians



Indiana requires all dispensers to report controlled substance dispensations to the Indiana PMP via the PMP Clearinghouse

What: Schedule II - V controlled substances (more than a 72 hour supply)

When: At least within twenty-four (24) hours (or next business day) from

the date on which a drug is dispensed.

Where: Indiana PMP Clearinghouse

To register for a data submitter account for PMP AWARXE, go to https://pmpclearinghouse.net

Registering with PMP Clearinghouse



Perform the following steps to create an account:

- 1. To request a data submitter account for PMP AWARXE, the user must go to https://pmpclearinghouse.net and click the "Create Account" link in the center of the screen.
- 2. The screen displayed requires the user to enter their current, valid email address, and a password. This email address will act as your user name when logging into the system. The password must contain at least 8 characters, including 1 capital letter, 1 lower case letter, and 1 special character (such as !, @, #, \$).

What information is Collected by INSPECT?



- A. The patient's name.
- B. The patient's identification number. If someone other than patient is picking up medication, the patient representative's identification number.
- C. The patient's date of birth.
- D. The national drug code (NDC) number of the controlled substance dispensed.
- E. The date the controlled substance is dispensed.
- F. The quantity of the controlled substance dispensed.
- G. The number of days of supply dispensed.
- H. The dispenser's United States Drug Enforcement Agency (DEA) registration number.
- I. The prescriber's United States Drug Enforcement Agency (DEA) registration number.
- J. Patient address information, including city, state and zip code.
- If patient is an animal: Animal's first name and species, owner's last name, owner's DOB.

Are you Registered?



WHAT: SEA 221 phases in the requirement for prescribers in various settings to check a patient's prescription drug history in the INSPECT database each time before prescribing an opioid or benzodiazepine.

WHERE: Practitioners can register for an INSPECT account online at <u>indiana.pmpaware.net</u>
WHY: Practitioners who distribute, dispense, prescribe, or administer a controlled substance are required to query patients' INSPECT history each time they prescribe an opioid or benzodiazepine.

The patient query requirements take effect on the following dates:

- Jan. 1, 2019: All practitioners who provide services to the patient in the emergency department of a hospital or a pain management clinic.
- Jan. 1, 2020: All practitioners providing services to the patient in a hospital.
- Jan. 1, 2021: All Practitioners

* All practitioners with an Indiana CSR must be registered in AWARxE by January 1, 2019 *

SB 225: Continuing Education



Establishes continuing education requirements for licensed healthcare practitioners who apply for a controlled substances registration. Two hours of qualifying CE training must be completed before each CSR renewal period. Provides that the continuing education requirements expire July 1, 2025.

Effective: July 1, 2019

Questions?

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