



# Office of Professional Licensure and Certification Prescription Drug Monitoring Program Strategic Plan

May 2019

# Background:

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In 2012, the New Hampshire legislature passed SB 286 giving life to The New Hampshire Controlled Drug Prescription Health and Safety Program (NH PDMP). The NH Board of Pharmacy was authorized by the New Hampshire Legislature to establish the NH PDMP and in 2014 received a development grant from the Bureau of Justice Administration to do so. Since that time, the Board of Pharmacy has been awarded two consecutive enhancement grants that have continued to support NH PDMP program costs to date.

The NH PDMP is a web-based, clinical tool that New Hampshire licensed practitioners can use when prescribing or dispensing Schedule II-IV controlled substances to their patients. The purpose of the database is to provide a complete picture of a patient's controlled substance use, so that the prescriber and pharmacist can properly manage the patient's treatment, including the referral of a patient to treatment services.

The NH PDMP began implementation on September 2, 2014 with weekly collection of controlled substance Schedule II through IV prescription data from licensed NH pharmacies and other NH licensed dispensers. Data was collected retroactively to March 1, 2014. The data became available to all for review on October 16, 2014. Since this time, the NH PDMP has experienced legislative changes to improve the program that led to functionality enhancements. These improvements include daily uploading of data to the database; data retention expanded from six months to three years; the ability to share de-identified data and to engage in interstate sharing agreements so that practitioners could query their patients in other states where NH had data agreements with; and lastly mandated use of the NH PDMP for prescribers who write opioid prescriptions for the treatment and management of pain.

In December 2017, a State legislative audit was initiated of the NH PDMP and NH Board of Pharmacy. The audit was intended to cover the period from the passing of the law in 2012 through State fiscal year 2017. The audit resulted in a 146 page document, several attachments and 26 findings. Some of the findings were relative to previous Board of Pharmacy audits, leaving a total of 18 findings specifically directed to the implementation and operation of the NH PDMP. The NH Board of Pharmacy was responsible for addressing the audit and with the assistance of the NH PDMP Advisory Council, submitted a plan that addressed each of the findings. The directed response to the legislature was to conduct a strategic plan that would incorporate all of the findings and how they would be addressed. Ultimately, the strategic plan is intended to produce a clear mission and a clear plan with goals, performance measures and strategies to achieve the goals.

# Introduction:

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A strategic plan provides a powerful roadmap to align and navigate efforts in pursuit of an impactful and inspiring mission. In June of 2018, the New Hampshire Board of Pharmacy and New Hampshire Prescription Drug Monitoring Advisory Council convened a strategic planning team comprised of diverse statewide stakeholders connected to substance misuse prevention and treatment to determine how the New Hampshire Prescription Drug Monitoring Program (NH PDMP) can contribute and achieve a positive impact in the next three years. Key participant areas and organizations represented included persons directly involved with prescription drug misuse, addiction, or overdose: NH Board of Pharmacy, PDMP Advisory Council, NH Hospital Association, Wentworth Douglas Hospital, Southern NH Hospital, NH Board of Nursing, NH Board of Dental Examiners, NH Board of Veterinarian Medicine, NH House of Representatives, Concord Hospital, Medical Examiner Office, Concord Police, Drug Enforcement Agency, NH Medical Society, NH Office of Medicaid, University of New Hampshire, and NH DoIT.

First, the group came to consensus on a collective mission for the NH PDMP. Every participant's input was considered in the process, culminating in a concise, compelling mission to serve as the point of alignment for the rest of the plan. Next, the group conducted an assessment of the overarching goals. A further review/assessment of all factors that have the potential to either help or hinder achievement of the mission and overarching goals was conducted. The assessment was informed by information of the current status and optional statuses of PDMP best practices. Utilization of the PEW Foundation strategic planning tool for PDMP was used to assess each PDMP best practice.

The results of the assessment were synthesized into nine PDMP Practices: the most important areas of focus to achieve significant progress toward the mission. Goals were developed to address each of the PDMP Practices. Performance measures were established to guide evaluation of progress toward reaching the goals. Strategies were created to define how each goal would be attained.

Consistent strategic plan review and follow-up will be key to success. Strategic planning stakeholders through the NH PDMP Advisory Council will be convened for quarterly report progress on action plans and performances measures, and collaborate on any challenges that arise with reports to the Board of Pharmacy. The group will also meet annually to review and update the strategic plan, optimizing its relevance and effectiveness. This plan reflects the results of the strategic planning process, defining the Board's direction for the next three years. Moreover, it represents New Hampshire stakeholders' commitment to aligning efforts to significantly move the needle on this serious issue.

# PDMP Mission and Strategic Goals:

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## Mission

Promote the quality of patient care and appropriate use of controlled substances for legitimate medical purposes, including deterrence of misuse and diversion of schedule II-IV controlled substances by:

- Inclusion of more accurate and complete data tracking of opioids and other scheduled drug prescriptions
- Helping prescribers and pharmacists make safe prescribing and dispensing decisions
- Improving the identification and education of high risk indicators (e.g. overdose and substance use disorders)

## Strategic Goals

- 1 Provide an easy and accurate tool that improves prescribing and dispensing decisions
- 2 Develop advanced analytics to improve patient outcomes
- 3 Support initiatives through a multi-disciplinary leadership collaborative

# Multi-disciplinary team<sup>1</sup> developed three strategic goals to support both short and long term PDMP objectives

*In June of 2018, a strategic planning team comprised of diverse statewide stakeholders connected to identify key strategic objectives to support the evolution of the New Hampshire Prescription Drug Monitoring Program (PDMP)*

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## 1 Provide an easy and accurate tool that improves prescribing and dispensing decisions

- *Provide health care practitioners a tool that supports them in reducing the misuse and diversion of controlled substances, while assisting patients with legitimate medical needs with appropriate access to controlled substances*
  - *Increase the number of enrolled prescribers and dispensers and their use of the program*
  - *Improve the usability and integrity of the PDMP*

## 2 Develop advanced analytics to improve patient outcomes

- *Use data to improve appropriate prescribing and dispensing*
- *Assist prescribers and dispensers in recognizing at-risk patient indicators*

## 3 Support initiatives through a multi-disciplinary leadership collaborative

- *Collaborate with licensing boards for compliance to statutes/ administrative rules governing the program and partner to support their providers throughout the patient care continuum*
- *Share insights with key stakeholders to inform future policy/ regulation*
  - *Leverage PDMP information to improve public health and public safety policies, strategies, and services*

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# Provide an easy and accurate tool that improves prescribing and dispensing decisions (I)

## Objective

## Strategy

## Performance Measure

Access

**Support individual Boards in practitioner registration compliance**

- Collaborate with individual boards to define compliance
- Outline required reports to be delivered to appropriate Boards and timing to identify circumstances of non-compliance; examples include:
  - Report of provider registration
  - Report of in-state prescribers writing opioids that do not have current PDMP registration
- Support Executive Board Directors in developing process to hold licensee accountable
- Launch delivery of reporting to Boards
  - Include OPLC in communications to ensure oversight of Board remediation

By December 2019, a registration audit will be conducted and a registration report provided to each regulatory board.

By December 2019, a policy & procedure will be developed for reporting to Boards and outcome data returned back to PDMP

Usability

**Assess accuracy and completeness of data**

- Develop process to identify instances of non-compliance to PDMP reporting
- Develop process to assess individual data elements that should be returned to dispensers as errors
- Create a tracking process to ensure that corrected entries are returned in a timely manner
- Develop reporting to be provided to the Board of Pharmacy to enforce instances of non-compliance in reporting PDMP transactions

By December 2019, a prescription audit policy and procedure will be developed to track data entry compliance and error correction to ensure accuracy of PDMP data.

**Create a continuous improvement process with users**

- Identify annually potential barriers and propose solutions to improve usability and efficiencies through the PDMP Advisory Council and other stakeholders.
- Develop a pulse survey to be delivered to a portion of users to solicit higher volumes of feedback more frequently

By December 2019, survey prescribers and dispensers for input on barriers/solutions.  
  
By January 2020, release Request for Proposal

**Create infrastructure to allow PDMP integration into workflow and collaborate with hospitals, medical groups and pharmacies to drive integration rates**

- Work with other State PDMPs to identify organizations that they have or are working with to develop connectivity (e.g. EHR)
  - Partner to better understand the challenges they faced in integration and best practices they are willing to share
- Establish legislation that will allow prescribers, healthcare systems and pharmacies to adopt PDMP integration into electronic health records and/or their workflow (inclusive of the ability to share information among health care facilities in the state)
- Explore grant funding by the state for integration work or to offset cost from vendor

By August 2019, participate in Summer Study Committee review EHR integration and best way to pass legislation  
  
By June 2020, complete a Readiness Survey for EHR integration

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# Provide an easy and accurate tool that improves prescribing and dispensing decisions (II)

## Objective

## Strategy

## Performance Measure

### Education and Support

**Increase practitioner knowledge by providing additional tools and education to improve patient care by increasing the rate of PDMP use**

- Launch educational campaign in collaboration with regulatory boards to:
  - Establish key benefits of PDMP use; how to quickly assess a report
  - Efficiencies that can be gained through the use of delegates
- Launch Prescriber Practice Reports
  - Develop education with Boards to assist providers in effectively using the information given
    - Best practices
    - Additional resources (CDC guidelines, weaning protocols, etc.)
  - Establish reporting to Boards on providers that reviewed reports
- Launch Clinical Alerts
  - Develop and disseminate educational materials to prescribers with best practices of how to evaluate and take action on the clinical alerts in real time

By December 2019, PDMP will provide a power point training that can be posted on each regulatory board site that will cover PDMP use, report access and delegate utility.

By May 2019, Launch Prescriber Practice Report.

By June 2019, provide prescribers an educational tool on how to read and use the Prescriber Report.

By July 2019, provide Boards with additional resources to post on their sites as it relates to information on prescriber report.

By July 2019, launch Provider/Dispenser Alert, while reviewing data for “alert fatigue” on the other two alert measures.

By July 2020, evaluate the impact of the receipt of the alert.

# Develop advanced analytics to improve patient outcomes

## Objective

## Strategy

## Performance Measure

Data Access

**Identify root cause of gaps in ability to retrieve data and develop actions and timeline to solve access concerns**

- Clearly define data access requirements
- Identify and create a roadmap of gaps in data access (to include vendor issues and opportunities to advance staff analytical skills, but not to include user error by pharmacies, uploader issues, etc.)
- Develop working group meetings with vendor to close gaps, identify contract issues (to be remediated in RFP) or flag issues that cannot be corrected with current vendor

By January 2020, a RFP will be released that will outline all data access requirements and analytical specifications.

Patient Outcomes

**Reduce multiple provider episodes (3 prescribers or 3 dispensers)**

**Reduce number of patients receiving opioids at dosing >100 MME**

**Reduce combination prescribing of opioid/benzodiazepines**

- Develop pilot to assess impact of alerts on practitioners
  - Collection of alerts for multiple provider episodes, 100 MME and concurrent opioid/ benzodiazepine data
  - Board to assess rate of alerts per prescriptions dispensed, min, max and average impact to prescriber/ dispenser
  - Go/ No-go or modify alert decision
- Develop reporting that shows prescriber utilization of clinical alerts to be provided to individual Boards
- Launch of PDMP Clinical Alert Program to provide alerts to respective prescribers
  - Multiple provider episodes required by law)

By December 2019, initial evaluation of quarter 2 data for provider/dispenser alert. (only if released in July 2019)

Through December 2019, review data for “alert fatigue” on MME measure.

Through December 2019, review data for “alert fatigue” on concurrent opioid/buprenorphine measure.

Review

**Establish review process of prescriber and dispenser response activity**

- In support of review :
  - Clinical Alerts will have an added feature as to whether the prescriber reviewed the alert each quarter. PDMP staff will review for utility and provide a summary report /data to the respective boards.

By December 2019, provide regulatory boards an initial report on prescriber review of alerts received.

# Support initiatives through a multi-disciplinary thought leadership collaborative

## Objective

## Strategy

## Performance Measure

**Establish key stakeholder needs from the PDMP program**

- Work with state public health agencies such as DHHS, medical examiner office, legislative committees and other organizations to create reports that will assist them with their missions

By August 2019 participate in a Summer Study Committee to discuss legislation for data sharing agreements.

**Establish review of prescriber and dispenser activity from use of PDMP Data**

- Establish a database to collect all requests of data from all sources:
  - Regulatory Boards; Law Enforcement; Patients and Other
  - Collect input back from data recipients on outcome of data requests on a quarterly basis.

By December 2019, the program will establish a policy and procedure that will develop a database to collect PDMP information that goes out and the result of its utility by requestors (e.g. regulatory boards, law enforcement agency, medical examiner.)

**Develop a 2 year roadmap for legislative initiatives**

- Evaluate the policies, programs and other efforts to determine what is truly working in NH to improve patient care and reduce controlled drug related harms
  - Understand relationship between current policies and clinical outcomes related to further improve on efforts that are successful while amending those that have unintended consequences
- Establish legislation that will allow prescribers and healthcare systems to adopt PDMP integration into electronic health records

By August 2019, the program will work with the Advisory Council and OPLC to define the next 1-2 years of legislative initiatives to support clinical care operations that benefit patient care.