

FREQUENTLY ASKED QUESTIONS

for the



Revised: February 2014



NEW YORK STATE DEPARTMENT OF HEALTH
Bureau of Narcotic Enforcement

1-866-811-7957
www.health.ny.gov/professionals/narcotic

Online PMP

Q: What is the purpose of the Prescription Monitoring Program (PMP) Registry (formerly CSI)?

A: The Prescription Monitoring Program Registry provides practitioners and pharmacists with direct, secure access to view their patients' recent controlled substance prescription history to help them better evaluate a patient's treatment as it pertains to controlled substance prescribing and dispensing.

Effective August 27, 2013, practitioners will be required, with limited exceptions, to check the PMP Registry prior to writing a prescription for a controlled substance in schedule II, III, and IV for a patient. Pharmacists will have access to the PMP Registry after this date as well.

Q: Will pharmacists see the same information seen by practitioners?

A: Yes, if the pharmacist has an individual HCS account, he or she can access the same information when that patient presents a prescription for a controlled substance to the pharmacy.

Q: What are the benefits of the PMP Registry?

A:

- The program allows for better understanding of a patient's controlled substance utilization based on recent controlled substance prescription history.
- Provides a quick, confidential online report to the practitioner and the pharmacist.
- Available 24 hours a day, 7 days a week.
- Information is based on controlled substance prescription data from nearly 5,000 pharmacies.
- No cost to the practitioner or pharmacist.

Q: My patient appears on the Prescription Monitoring Program (PMP). Does this mean my patient is a "Doctor Shopper"?

A: Not necessarily. A PMP registry report indicates that your patient has received controlled substance prescriptions in the past six months. This report is intended to provide you access to your patient's controlled substance prescription history for purposes of making treatment decisions. The information in this report is provided to help reasonably inform a practitioner when he or she is deciding whether or not to prescribe or dispense a controlled substance.

Q: Who can access the PMP Registry?

A: Any New York State licensed prescriber, excluding veterinarians, may access the PMP Registry. Each prescriber must have an individual Health Commerce System Account (HCS) to gain access. The application to establish an account for a licensed professional is available on the following website: <https://hcsteamwork1.health.state.ny.us/pub/top.html>

Important Note: Effective August 27, 2013, pharmacists will have access to the program and will need their own HCS accounts.

Q: How do I establish an HCS Account?

A: If you are a **licensed professional** the application to establish an account is available on the following website: <https://hcsteamwork1.health.state.ny.us/pub/top.html>

If you are a **resident, unlicensed professional, limited permit holder, or administrative staff** acting as a designee, the HCS director or coordinator (e.g., prescribing practitioner or facility administrator) will log into the HCS system: <https://commerce.health.state.ny.us>, click on Coord Account Tools under My Applications, Under Account Request, click "User"; and follow the process.

Q: I currently have an HCS account, do I still need to register for the PMP Registry?

A: No. There is not a separate registration for the PMP. By maintaining an HCS account, practitioners, pharmacists, and designees will have access to the PMP Registry.

Note: Pharmacists and designees will not have access until August 27, 2013.

Q: I submitted for an HCS account, what happens next?

A: New accounts are usually established within two weeks. Once your application is processed you will be e-mailed documents. They must be printed, notarized and received by the Department of Health for your user ID to be issued. For account information or help with your HCS Account please contact Commerce Account Management Unit (CAMU) at 1-866-529-1890, option 1.

Q: I have an HCS account but do not know my user ID or password. Who should I contact?

A: For account information or help with your HCS Account please contact CAMU at 1-866-529-1890, option 1.

Q: My password expired, who should I contact?

A: For expired passwords please contact CAMU at 1-866-529-1890, option 1.

Q: Once I established an HCS account how do I access the PMP Registry?

A:

- Go to the HCS at: <https://commerce.health.state.ny.us>
- Log onto the system with your user ID and password (*If you can't remember your password, call the Commerce Account Management Unit at 1-866-529-1890, Option 1, for assistance*).
- Click on the NYS PMP Registry campaign button on the home page or select "Applications" at the top of the page. Click on the letter "P".
- Scroll down to "Prescription Monitoring Program Registry".

- Click the green plus sign under the Add/Remove column to add this application to your favorites so you don't have to scroll down each time in the HCS [optional].
- Click to open the program.
- Enter patient information and all other required information.
- Review the Frequently Asked Questions within the application for further information.

Q: Am I required to review the PMP for any controlled substance prescribed, or is this review limited to certain drugs?

A: Effective August 27, 2013, the duty to consult the PMP is required of the practitioner prior to prescribing or dispensing any controlled substance listed on schedule II, III or IV.

Q: If a five-day supply of a controlled substance is prescribed from an Emergency Department (ED) of a general hospital, do I need to consult?

A: No.

Q: If a five-day supply of a controlled substance is prescribed from a private practice, do I need to consult the Prescription Monitoring Program Registry?

A: Yes.

Q: If a five-day supply of a controlled substance is prescribed from an Ambulatory Surgery Center, do I need to consult the Prescription Monitoring Program Registry?

A: Yes.

Q: If a five-day supply of a controlled substance is prescribed from an Urgent Care, do I need to consult the Prescription Monitoring Program Registry?

A: Yes.

Q: If a five-day supply of a controlled substance is prescribed from a Dental Office, do I need to consult the Prescription Monitoring Program Registry?

A: Yes.

Q: If a five-day supply of a controlled substance is prescribed from a Clinic, do I need to consult the Prescription Monitoring Program Registry?

A: Yes.

Q: *Are any practitioners excluded from the requirement to consult the PMP prior to dispensing or prescribing?*

A: Veterinarians are excluded. In addition, practitioners who are not veterinarians may be excluded if they meet the criteria defined within Section 3343-a Article 33 of the Public Health Law. Please review this section of the law, which may be accessed from the Bureau of Narcotic Enforcement's web page; www.nyhealth.gov/professionals/narcotic. Click on the link on the left hand side of the page for "Laws and Regulations" and follow the instructions on this page to get to Article 33.

Q: *I am a practitioner working in a hospital that is licensed as a Class 3 Institutional Dispenser. Am I exempt from consulting the PMP?*

A: The duty to consult the PMP Registry shall not apply to a practitioner prescribing or ordering a controlled substance for use on the premises of an institutional dispenser pursuant to Article 33.

Q: *I am a practitioner working in a Nursing Home, Adult Home, Adult Assisted Living, correctional facility, etc. that is licensed as a Class 3A Institutional Dispenser Limited. Am I exempt from consulting the PMP?*

A: The duty to consult the PMP Registry shall not apply to a practitioner prescribing or ordering a controlled substance for use on the premises of an institutional dispenser limited pursuant to Article 33.

Q: *Do I need to consult the PMP Registry if the prescription was dispensed for administration on the premises of an institutional dispenser limited, but the patient leaves the premises at any time with that medication?*

A: If the patient would be consuming the medication, at any time, off the premises then the PMP Registry must be consulted.

Q: *My patient is under the care of hospice, am I exempt?*

A: Yes, the duty to consult the PMP Registry shall not apply to a practitioner prescribing a controlled substance to a patient under the care of hospice.

Q: *What if the power goes out? Am I limited to write for only a five-day supply of controlled substance?*

A: No. You will conduct business as usual and document the relevant information in the patient's chart, as required. The duty to consult the PMP Registry shall not apply to a situation where the registry is not operational as determined by the department or where it cannot be accessed by the practitioner due to a temporary technological or electrical failure, as set forth in the regulations.

Q: *If the power goes out am I required to document in the patient's chart that I was unable to consult the PMP Registry?*

A: Yes. All relevant information related to the technological failure must be documented in the patient's chart.

Q: What if the DOH Health Commerce System (HCS) or PMP Registry is not operational at the time of prescribing, can I still prescribe?

A: Yes, you can still prescribe, use your medical judgment and document in the patients chart the reason why you could not consult. The duty to consult the PMP Registry shall not apply to a situation where the registry is not operational as determined by the department or where it cannot be accessed by the practitioner due to a temporary technological or electrical failure, as set forth in the regulations.

Q: What are the penalties if I willfully do not consult the PMP Registry when I prescribe a Schedule II, III, or IV?

A: There are no specific penalties attached to failing to comply with I-STOP. However, a violation of the provisions of this law is the same penalty as for any violation of the Public Health Law.

Q: Can I designate someone to check the PMP Registry for me?

A: Yes. Effective August 27, 2013 practitioners and pharmacists can designate staff to look up patients on the PMP registry on their behalf.

Designees for Practitioners: The designee, if unlicensed, will need to work with the HCS coordinator from their facility, or prescribing practitioner, to establish their own HCS account. After the designee obtains an HCS account user ID, the practitioner will need to log into the HCS, open the PMP application, and click on the Designation tab. On the designation screen, the practitioner will enter the HCS user ID of the individual that will be performing the look up on their behalf as a designee.

Designees for Pharmacists: Designees for pharmacists, which are limited to other pharmacists and pharmacy interns, will need to work with the HCS coordinator for the pharmacy to establish their own HCS Account. After the designee obtains an HCS account user ID, the pharmacist will need to log into the HCS, open the PMP application, and click on the Designation tab. On the designation screen, the pharmacist will enter the HCS user ID of the individual that will be performing the look up on their behalf as a designee.

Q: Can I share the report reflecting my patient's controlled substance history with my patient?

A: Yes. Release of the information is allowed to your patients but should be based on your professional medical judgment. All state and federal confidentiality rules must be adhered to.

Q: What type of information will the report provide?

A: Effective August 27, 2013 or sooner, patient search reports will include all controlled substances that were dispensed and reported by the pharmacy/dispenser for the past 6 months. Pharmacy and practitioner information will be provided as well.

Q: How is the controlled substance data in the PMP Registry obtained?

A: All New York State pharmacies and dispensing practitioners are required to submit their controlled substance dispensing data to the Bureau of Narcotic Enforcement.

Q: Are refills and partial-filled prescriptions listed in the report?

A: Yes. Dispensers are required to report refills and partial-filled prescriptions to the Department of Health.

Q: How current will the data be that is reflected on the PMP when the practitioner is required to consult the PMP?

A: Effective August 27, 2013, the data will be submitted to the Bureau on a “real time” basis as defined by the commissioner within the regulations.

Q: Why are my patients’ prescriptions not showing up on the PMP Registry?

A: The PMP Registry is based on controlled substance data submitted by pharmacies and dispensing practitioners. It may take up to 24 hours for the prescription to be visible in the PMP Registry. [Please note: Section 80.73 Title 10 Rules and Regulations define the dispensing data that must be filed with the Bureau.](#)

Data may not display as expected in the PMP Registry due to the following factors:

- There could be a delay in the pharmacy or dispensing practitioner's submission of data to the Bureau.
- There may have been errors generated during the pharmacy or dispensing practitioner's data submissions, which require correction before the data will be displayed in the PMP Registry.
- The patient did not fill the prescription.
- The practitioner's search criteria for the patient demographics (last name, first name, sex and DOB) does not match the pharmacy's data submission for that patient.

[Please note:](#) when entering patient information on the PMP Registry, enter FIRST NAME then LAST NAME.

Q: Do I have to report to the Department that I reviewed my patient’s controlled substance history?

A: No.

Q: What is the “Drug Listing”?

A: The “Drug Listing” tab in the horizontal menu at the top of the screen provides a reference of the brand names that are associated with the drug names shown on the Patient Search Results and lists the controlled substance schedule in New York State. Schedules of controlled substances are defined within section 3306 Article 33 of the Public Health Law. This information may be accessed from the Bureau of Narcotic Enforcement’s web page; www.nyhealth.gov/professionals/narcotic. Click on the link on the left hand side of the page for “Laws and Regulations” and follow the instructions on this page to get to Article 33.

Q: *After reviewing the PMP for a patient, what do I do if I suspect diversion?*

A: Please note a link on the bottom of the Confidential Drug Utilization Report to report a prescription discrepancy, or to send questions or comments about the report to the Bureau of Narcotic Enforcement. You may also contact the Bureau of Narcotic Enforcement office in your area to speak to a narcotic investigator.

Albany/Central Office: (866) 811-7957 Opt. #2

Western Area Regional Office (Buffalo Area): (716) 847-4532

Rochester Office: (585) 423-8043

Syracuse Office: (315) 477-8459

New York City Metropolitan Area Regional Office: (212) 417-4103

Q: *My patient is claiming identity theft. How should I direct him or her?*

A: Identity theft should be reported to the local police department.

Q: *How do I assist patients who want help for an addiction problem?*

A: Treatment program information is available from the NYS Office of Alcoholism and Substance Abuse Services at www.oasas.ny.gov or by calling 1-877-846-7369. You may also access the Substance Abuse and Mental Health Services Administration (SAMHSA) website at www.buprenorphine.samhsa.gov to locate a participating opioid addiction physician in your area.

Q: *As a physician, how do I become eligible to prescribe buprenorphine for opioid addiction?*

A: You must qualify for a Drug Enforcement Administration (DEA) waiver. You can obtain more information at the Center for Substance Abuse Treatment (CSAT) at 1-866-287-2728 or www.buprenorphine.samhsa.gov.

Q: *I have patients who receive Schedule II prescriptions which require a new prescription with each fill. Do I have to consult the PMP for the same patient each month when writing the same prescription?*

A: Effective August 27, 2013, the duty to consult the PMP is required of the practitioner prior to prescribing or dispensing any controlled substance listed on schedule II, III or IV, regardless if it is the same patient being prescribed a controlled substance each month.

Q: *Is there a distinction between immediate release and extended release products when viewing drugs on the PMP?*

A: The PMP will display the drug and strength, but does not specify the dosage form.

Q: *How can I integrate the PMP into our electronic health record or electronic prescribing software?*

A: At this time, the PMP must be accessed through the Health Commerce System. The Department of Health is actively working on solutions to integrate the PMP Registry into electronic medical records.

Q: What is the difference between the “Printer Friendly” and “Extended” options for the Data Detail Level?

A: The “Printer-Friendly” level is intended to be printable in landscape mode on 8.5” x 11” paper. When the “Extended” option is selected, additional fields are included in the search results; including the Payment Method and the Dispenser. The results area can be scrolled horizontally and there is no guarantee regarding printability.

Q: What is the purpose of the “My DEA Numbers” tab?

A: The “My DEA Numbers” tab provides the option of entering one or more DEA numbers associated with the practitioner. It allows for separation of prescriptions associated with any of the entered DEA numbers from all other results on the Patient Search Results page. (My Prescriptions versus Other’s Prescriptions)

Q: Which DEA number should I use if I hold multiple registration numbers?

A: The DEA number associated with your prescriptions is the number that the dispenser submitted to the Department. You may enter all of your DEA numbers under the DEA listing tab. Patient Search results will be sorted by DEA number.

Q: What is the difference between “other’s prescriptions” and “my prescriptions”?

A: “Other’s prescriptions” reflect prescriptions written by another prescriber (other than you).

Q: Who do I contact if I didn’t write the prescription shown under “My Prescriptions”?

A: Use the link on the page to report a prescription error to the Bureau of Narcotic Enforcement. The link is located below your patient’s prescription information.

Q: How do I contact the other physician(s) for a consultation?

A: Practitioner information is public and can be researched from the following web site:
<http://www.nydoctorprofile.com/>

Q: What will happen if I do not enter my DEA number in the “MY DEA Numbers” tab?

A: If you do not enter you DEA number in the “MY DEA Numbers” tab, there will be no separation of prescriptions you wrote from prescriptions other prescribers wrote.

Q: Do I need to rerun the patient search after I enter my DEA number(s)?

A: Only if you want to see your prescriptions separate from other prescribers. The same data will be displayed; just the format of the data displayed will change.

Q: I entered my DEA number on the My DEA Numbers page, but made an error. Can I modify the entry?

A: Click on the check box next to your DEA Number and then click on "Remove". Then enter the correct DEA number in the "Enter your DEA number" field.

Q: I changed my DEA number, how do I update this data in my HCS account?

A: To remove a DEA Number, click the check box next to it and click the "Remove" button. Multiple DEA numbers may be removed at the same time.

Q: Will the PMP display a patient's controlled substance records for doctors within the same practice together?

A: No. The PMP will display a patient's controlled substance records for the practitioner under "My Prescriptions", provided that the practitioner entered his or her DEA number(s) using the "My DEA Numbers" menu option. The "My DEA Numbers" link is located in the horizontal menu at the top of the screen. All other controlled substance records for a patient, including records of prescriptions written by practitioners within the same practice, are grouped into "Other's Prescriptions" on the PMP display.

Q: What is the "Update Personal Info" menu option for?

A: It is used to update Business contact information, emergency contact information, and professional information.

Q: Can I update my Physician Profile from the HCS account?

A: Yes, select the Applications Tab at the top of the page, select the letter "P" and scroll down to Physician Profile System.

Q: I received an "Access Denied" message with a link to Update Personal Info. Why am I being denied access to the PMP application?

A: The system was not able to validate your license number to allow access to the application because your license number is either missing from your HCS personal account information or your current license number needs to be added to your HCS personal account information. Please click on the link and update your license information. Once updated, you should be able to access the PMP application.

Q: I received an "Access Denied" message with a System Error Code of BNE8937. Why am I being denied access to the PMP application?

A: You are currently not allowed to access the PMP application because either your NYS license has expired or your license has an administrative action code on it. The PMP relies upon licensing data provided by the New York State Education Department (NYSED). Questions regarding the status of your license should be directed to NYSED.

Q: Why does my patient's prescription information appear in 'blocks' or 'groups' on the Drug Utilization Review Screen?

A: The PMP utilizes matching criteria to determine if records for people with slight differences in demographic data could be for the same individual. The dispensed prescriptions are shown based on variations in the name, date of birth and address. Practitioners should compare patient name, date of birth and address in determining whether or not the different groups represent the same individual. For example, an address for the same patient may be similar, but the information will be grouped separately.

For example, information dispensed under an address of 33-33 Main St., may appear in a separate grouping from information dispensed under the address of 3333 Main St.

Also note that if you entered your DEA numbers on the 'My DEA Numbers' tab, you will see the prescriptions *you* wrote for that patient grouped first, followed by those written by others, if any.

Q: How is the prescription data sorted?

A: Within each grouping, the information is sorted by date dispensed.

Q: Will I have to attest every time I access a patient's information?

A: By clicking "Yes" on the Patient Search screen to advance the search, you are attesting to abide by the guidelines for use of the PMP in accordance with the New York State Public Health Law. You may view the guidelines by clicking the link at the top of the Patient Search screen.

Q: Where can I find the guidelines that I am attesting to?

A: The guidelines or attestation is accessible via a link on the Patient Search page.

Q: What is the purpose of the Search Terms Review page?

A: The Search Terms Review page allows you to review the entered search criteria and ensure its accuracy. You can choose either to complete the search by pressing "Continue", or to fix any mistakes by pressing "Revise Search Terms".

Q: What is the System Alert Message?

A: The System Alert Message will allow announcements to be made regarding downtime and important events, and once set will appear on all pages within the application.