INSPECT GUIDELINES FOR VETERINARIANS

LEGAL DEFINITIONS

<u>Prescribing:</u> 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.

<u>Dispensing:</u> 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.

INSPECT SYSTEMS

<u>PMP Clearinghouse:</u> This is the data submitter system for state prescription drug monitoring programs (PDMP). Any facility that dispenses controlled substances must create an account and submit their dispensation information via PMP Clearinghouse. PMP Clearinghouse users are able to submit data through the web portal via manual entry or upload of ASAP files. Secure FTP (SFTP) access is also available.

<u>PMP AWARXE</u>: The PMP AWARXE system stores dispensation data received from PMP Clearinghouse and displays it in patient specific profiles that can be reviewed by practitioners. Each practitioner who is authorized to prescribe, administer, or dispense controlled substances may register for an individual account.

CONTROLLED SUBSTANCE REGISTRATION (CSR) & DEA INSTRUCTIONS

FEE INFORMATION

Applicants must submit a sixty-dollar (\$60.00) application fee, made payable to the Indiana Professional Licensing Agency. Checks or Money orders are acceptable. All fees are non-refundable and non-transferable.

ACTIVE INDIANA LICENSE

Applicants must have an active Indiana veterinarian license before they can obtain an Indiana controlled Substance Registration (CSR). A veterinarian must hold one CSR in order to prescribe, administer or dispense controlled substances in the State of Indiana. An additional, separate 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. One valid CSR is sufficient for a veterinarian to prescribe controlled substances throughout the State.

INDIANA PRACTICE LOCATION

Veterinarians <u>MUST</u> use an Indiana practice address when applying for a CSR. A CSR will only be issued to a street address; post office boxes will not be acceptable unless accompanied by a street address. An application with an incomplete or out of state address will be returned. Controlled substances registrations are issued for a particular purpose at a specified location. Any change of address for practitioners must be reported to the PLA and to the appropriate professional licensing board in writing.



DRUG SCHEDULES TO REQUEST

Veterinarians may apply for authorization for Schedules II through V. Schedule I controlled substances have no accepted medical use and are generally restricted to researchers only.

Drug Enforcement Administration

Practitioners may apply for the Drug Enforcement Administration (DEA) registration after their Indiana CSR is issued. *The Professional Licensing Agency does not have DEA forms*. You may apply for a federal Drug Enforcement Administration (DEA) registration by going to their website (http://www.deadiversion.usdoj.gov/).

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

MINIMUM INSPECT REQUIREMENTS FOR VETERINARIANS

- 1. Veterinary facilities that are licensed to dispense controlled substances must register their facility as a dispenser in PMP Clearinghouse.
- 2. Each time ephedrine, pseudoephedrine, gabapentin or a controlled substance (greater than a 72 hour supply) is dispensed from the facility, the dispenser shall transmit to the INSPECT program the dispensation information. See **What information is collected by INSPECT** below for details.
- 3. Beginning January 1, 2019, any practitioner licensed in Indiana with authority to prescribe, dispense or administer controlled substances must have an individual account in the PMP AWARXE system.
- 4. Beginning January 1, 2021, Indiana practitioners must query a patient's INSPECT record each time prior to prescribing an opioid or benzodiazepine. To perform patient INSPECT queries, practitioners will log into their individual PMP AWARXE user account.

To register for an individual practitioner account and review patient prescription history reports, visit https://indiana.pmpaware.net and click "Create an Account." Be sure to complete all required fields. INSPECT staff will review and approve the pending registration within 2-3 business days.

REGISTERING A DATA SUBMITTER ACCOUNT IN PMP CLEARINGHOUSE

Indiana requires all pharmacies and dispensers to report controlled substance and gabapentin dispensations to the Indiana PMP via the PMP Clearinghouse. Dispensations must be reported at least within twenty-four (24) hours (or next business day) from the date on which a drug is dispensed to a patient.

Perform the following steps to create an account:

1. To request a data submitter (Pharmacist or other dispenser) account, the user must navigate to https://pmpclearinghouse.net and click the "Create Account" link.



- 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 !, @, #, \$)
- *Additional users of this account can be added by the primary account holder by clicking Account > Users > New User

Click here to access the online dispenser guide:

https://www.in.gov/pla/inspect/files/PMP-Data-Submission-Dispenser-Guide_v-2.0_-Feb-2020.pdf

REPORTING DISPENSATIONS TO INSPECT

Who is required to submit information to INSPECT?

As stipulated by IC 25-26-24-17, licensed dispensers throughout Indiana—and out-of-state (non-resident) pharmacies licensed to dispense drugs in Indiana—are required to submit controlled substance prescription data to INSPECT every twenty-four (24) hours.

How often do I have to report to INSPECT?

Submission of controlled substance data must occur within twenty-four (24) hours (or next business day) of the dispensation of a controlled substance.

How often do I have to zero report to INSPECT?

Veterinarians are no longer required to zero report for the days that zero controlled substances are dispensed from their facility. However, if a controlled substance is dispensed that exceeds the 72-hour supply, that prescription must be reported to the INSPECT program via PMP Clearinghouse within twenty-four (24) business hours of the medication being dispensed to the patient.

What information is collected by INSPECT?

An INSPECT report summarizes the ephedrine, pseudoephedrine, Gabapentin or controlled substances a patient has been prescribed, the practitioner who prescribed them and the dispensing facility where the patient obtained them. Each time ephedrine, pseudoephedrine, or a controlled substance is dispensed, the dispenser is required to submit the following information to INSPECT within 24 hours of dispensation.

- **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. (see IC 25-26-24-6 below)
- **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 the patient is an animal, the date of birth reported to INSPECT for dispensations should always be the owner's date of birth.

What information is NOT collected by INSPECT?

- Any dispensation of medication that is a 72 hour supply or less.
- Medication of any kind administered directly to a patient (including animals)

IC 25-26-24-6 "Identification number"

"Identification number" refers to the following: (1) The unique number contained on any of the following: (A) A valid driver's license of a recipient or a recipient's representative issued under Indiana law or the law of any other state. (B) A recipient's or a recipient representative's valid military identification card. (C) A valid identification card of a recipient or a recipient's representative issued by: (i) the bureau of motor vehicles as described in IC 9-24-16-3; or (ii) any other state and that is similar to the identification card issued by the bureau of motor vehicles. (D) If the recipient is an animal: (i) the valid driver's license issued under Indiana law or the law of any other state; (ii) the valid military identification card; or (iii) the valid identification card issued by the bureau of motor vehicles and described in IC 9-24-16-3 or a valid identification card of similar description that is issued by any other state; of the animal's owner.

How Do I Report Dispensations to an Animal Owned by a Humane Society?

First name = Humane Last Name = Society DOB = 01/01/2000

Animal Name = The name that the shelter assigned to the animal. If they did not assign a name to the animal, please enter "Animal Shelter" in the Animal Name Field (PAT23 *)

Pick-up ID = The ID of the person who picks up medication for the animal. State law requires dispensers to report the ID number of any person picking up a controlled substance.

INSPECT STATUTES

Chapter 7. Central Repository for Controlled Substances Data: IC 25-26-24

"Practitioner" IC 25-26-24-11

As used in this chapter, "practitioner" means a physician, dentist, <u>veterinarian</u>, podiatrist, nurse practitioner, scientific investigator, 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 or research in the United States.

Registration for the INSPECT database: IC 25-26-24-20

Beginning January 1, 2019, a practitioner who is permitted to distribute, dispense, prescribe, conduct research with respect to, or administer ephedrine, pseudoephedrine, or a controlled substance in the course of the practitioner's professional practice or research in the United States must be certified under section 11.1(d)(4) of this chapter to receive information from the INSPECT program.



NOTE: Individuals with a CSR who are <u>not</u> authorized to prescribe or dispense controlled substances will be exempt from the mandatory registration. If you have an instructor or researcher CSR and will not be treating patients, prescribing to patients or dispensing to patients (this includes animals), you will not be eligible for a healthcare provider INSPECT account. You may, however, choose to register as a licensed or unlicensed prescriber delegate, which will allow you to run INSPECT reports on behalf of a prescriber.

Release of INSPECT information to a veterinarian: IC 25-26-24-19.5

A veterinarian who is treating an animal may obtain information about:

- (1) the owner of the animal; or
- (2) the individual to whom an opioid or benzodiazepine will be dispensed for the animal; from the data base before prescribing an opioid or benzodiazepine for the animal.

Mandatory Query of the INSPECT database: IC 25-26-24-19

- **Beginning July 1, 2018,** a practitioner who has had the information from the data base integrated into the patient's electronic health records.
- **Beginning January 1, 2019,** a practitioner who provides services to the patient in the emergency department of a hospital licensed under IC 16-21 or a pain management clinic.
- **Beginning January 1, 2020,** a practitioner who provides services to the patient in a hospital licensed under IC 16-21.
- **Beginning January 1, 2021**, all practitioners.

Continuing Education SB 225: IC 35-48-3-3.5

Continuing education requirements. 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.

Gabapentin reporting to INSPECT: IC 25-26-24-2.5

Effective July 1st, 2019, pursuant to House Enrolled Acts 1246 and 1542, the Indiana scheduled prescription electronic collection and tracking (INSPECT) program will begin monitoring and tracking the prescribing and dispensation of Gabapentin.

*Veterinarians are exempt from Indiana's mandatory electronic prescribing law, which went into effect on January 1, 2022.

