

MAPS Updates

October 11, 2019

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Department of Licensing and Regulatory Affairs
Michigan Automated Prescription System
BPL-MAPS@Michigan.gov | 517-241-0166

Bureau of Professional Licensing

- Established in July 2015
- 10 Occupational Licensing/Regulation Boards
- 24 Health Professional Licensing/Regulation Boards
- Boards are advisory and determine sanctions
- License and regulate over 758,000 individuals
- 3 Divisions: Licensing, Investigations & Inspections, Enforcement
- Enforcement Division: Administers Pharmacy and Drug Monitoring Section and Michigan Automated Prescription System (MAPS) Section; investigates overprescribing, over dispensing, and drug diversion



Controlled Substance Prescriptions Filled in Michigan by Year

	Total CS prescriptions dispensed	% change from previous year
2007	17,007,858	
2008	17,400,640	2.31%
2009	17,876,684	2.74%
2010	18,954,172	6.03%
2011	19,763,680	4.27%
2012	20,991,020	6.21%
2013	20,728,216	-1.25%
2014	20,904,764	0.85%
2015	21,472,326	2.71%
2016	21,092,674	-1.77%
2017	19,943,203	-5.45%
2018	17,642,901	-11.53%



Opioid Prescriptions Filled in Michigan by Year

	Total Opioid Prescriptions Dispensed	% Change from Previous Year
2013	9,920,288	
2014	10,301,142	3.84%
2015	10,833,681	5.17%
2016	10,507,059	-3.01%
2017	9,670,789	-7.96%
2018	8,223,103	-14.97%



Michigan Controlled Substance Prescription Data

The 2018 Drug Utilization Report has been released



MAPS Background

- Contains over 100 million records
- Data maintained for 5 years
- Required reporting of CS Schedule 2-5 from:
 - Prescribers who dispense CS Schedule 2-5
 - Pharmacists (dispensers)
 - Veterinarians



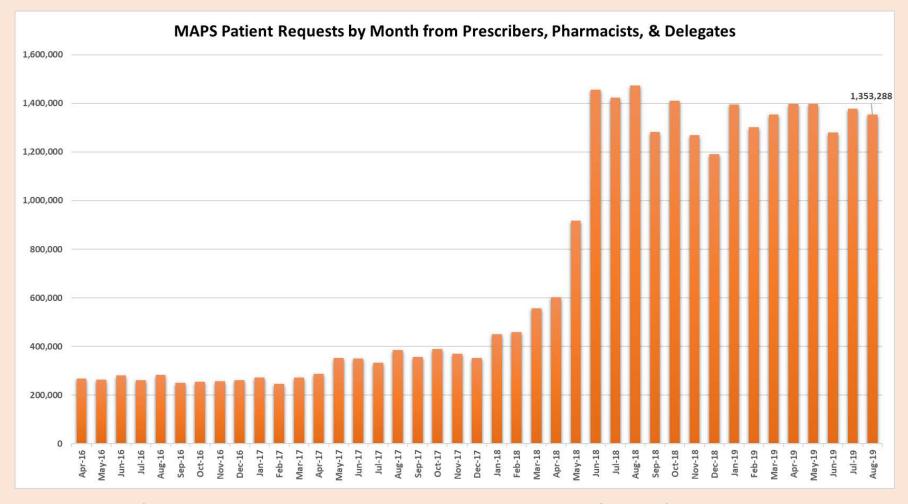
MAPS Update

- Successfully launched Appriss Health's PMP AWARXE on April 4, 2017
- Added Appriss Health's NarxCare report to MAPS on December 4, 2017
- Response times average 0.4-0.8 seconds
- Registered Users:

	As of 04/04/2017	As of 08/20/2019	Increase
Prescribers	9,156	47,623	38,467
Dispensers (Pharmacists)	3,994	8,741	4,747
Delegate Users	1,096	20,425	19,329



MAPS – Patient Requests



*Note: Includes online requests and integration requests from MAPS (Michigan) registered users



PMP Interconnect

States Connected

- 1. Alabama
- 2. Arizona
- Colorado
- 4. Connecticut
- 5. Delaware
- 6. Florida
- 7. Idaho
- 8. Illinois
- 9. Indiana
- 10. Iowa
- 11. Kansas
- 12. Kentucky
- 13. Louisiana
- 14. Maine
- 15. Military Health System
- 16. Minnesota
- 17. Mississippi

- 18. Montana
- 19. Nevada
- 20. New Mexico
- 21. New York
- 22. North Carolina
- 23. North Dakota
- 24. Ohio
- 25. Rhode Island
- 26. South Carolina
- 27. South Dakota
- 28. Tennessee
- 29. Virginia
- 30. West Virginia
- 31. Wisconsin

States Pending Connection

- 1. Puerto Rico
- 2. Washington, D.C.



Patient Reports

NarxCare Reports



MAPS – NarxCare Report

- Narx Scores and Predictive Risk Scores (overdose)
 - Scores: based on algorithms, including MMEs, number of prescribers and pharmacies
 - ➤ Scores: Ranges from 000-999; higher scores equate to higher risk and misuse
- Red Flags

• Rx Graphs

PDMP Data



Overdose Risk Score

- The Overdose Risk Score (ORS) is based on an Ohio study evaluating 1,687 unintentional overdose deaths from the year 2014 and was developed using modern data science techniques.
- The ORS ranges from 000-999.
- The risk of unintentional overdose death approximately doubles for every 100pt increase in the ORS.
- Using the 000-190 (< 200) scoring group as a referent group results in the following odds ratios:

Overdose Risk Score	Odds Ratio of Unintentional Overdose Death
000-200	1
201-300	10
301-400	12
401-500	25
501-600	44
601-700	85
701-800	141
801-900	194
901-990	329



Red Flag Indicators

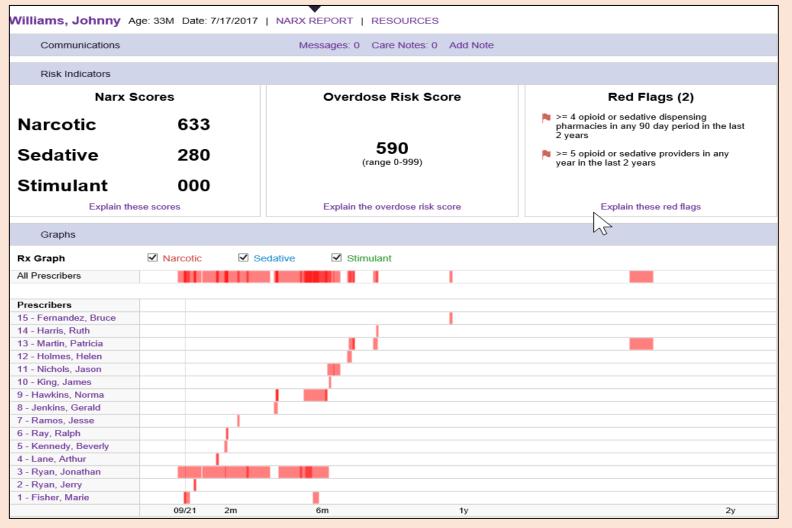
There are currently four **Red Flag** Indicators:

- More than 5 providers in any year
- More than 4 pharmacies in any 90-day period
- More than 40 Morphine Milligram Equivalent (MME) per day average and more than 100 MME total
- Combination Therapies: Opioids and Benzodiazepines

*Per CDC guidance, the MME conversion factors prescribed or provided as part of the medication-assisted treatment for opioid use disorder should not be used to benchmark against dosage thresholds meant for opioids prescribed for pain. Buprenorphine products have no agreed upon morphine equivalency, and as partial opioid agonists, are not expected to be associated with overdose risk in the same dose-dependent manner as doses for full agonist opioids. MME = morphine milligram equivalents. LME = Lorazepam milligram equivalents. mg = dose in milligrams.



MAPS - NarxCare Report





MAPS – NarxCare Report (continued)

02/01/2017	HYDROCODON-ACETAMINOPHN	10-32	25	60	15	Jo I	Rya	CVS		0	600.00		40.00	Medica	id	ОН
01/23/2017	OXYCODONE-ACETAMINOPHEN	5-325	5	60	7	Ma	Fis	CVS		0	450.00		64.29	Medica	id	ОН
01/12/2017	MORPHINE 2 N NML SYRINGE			1	30	No	Haw	Wall D		1	6.00		0.20	Private	Pay	ОН
01/12/2017	MORPHINE 4 MOTAL SYRINGE			1	2	No	Haw	Wall D		1	12.00		6.00	Private	Pay	ОН
01/10/2017	OXYCODONE-ACETAMINOPHEN	5-325	5	120	30	Jo I	Rya	cvs		0	900.00		30.00	Comm	ercial PBM	ОН
01/07/2017	DEMEROL 25 MG/ML SYRINGE			1	2	Ja I	Kin	Wall D		1	7.50		3.75	Private	Pay	ОН
01/03/2017	HYDROCODON-ACETAMINOPHE	N 5-3	25	60	8	Ja I	Nic	cvs		0	300.00		37.50	Medica	id	ОН
12/26/2016	HYDROCODON-ACETAMINOPHE	N 5-3	25	60	8	Ja I	Nic	Wall D		0	300.00		37.50	Comm	ercial PBM	ОН
12/11/2016	HYDROCODON-ACETAMINOPHE	N 5-3	25	28	5	He	Hol	cvs		0	140.00		28.00	Private	Pay	ОН
12/07/2016	HYDROCODON-ACETAMINOPHE	N 5-3	25	14	7	Pa	Mar	cvs		0	70.00		10.00	Comm	ercial PBM	ОН
12/07/2016	HYDROCODON-ACETAMINOPHE	N 5-3	25	2	2	Pa	Mar	Wall D		1	10.00		5.00	Private	Pay	ОН
11/07/2016	HYDROCODON-ACETAMINOPHE	N 5-3	25	10	5	Pa	Mar	CVS		0	50.00		10.00	Private	Pay	ОН
11/06/2016	HYDROCODON-ACETAMINOPHE	N 5-3	25	1	2	Ru	Har	Wall D		1	5.00		2.50	Private	Pay	ОН
08/01/2016	OXYCODONE-ACETAMINOPHEN	5-325	5	20	3	Br I	Fer	Wall D		0	150.00		50.00	Comm	ercial PBM	ОН
11/12/2015	MORPHINE 2 MG/ML SYRINGE			1	30	Pa	Mar	Wall D		1	6.00		0.20	Private	Pay	ОН
Providers	Total Providers: 15															
Name	rotari rovidero. To	\$ A	Address				City			State		+	Zipcode	4	DEA	\$
Fernandez, I	Bruce		4367 Pleasant Cr	nesina		-	Five Poin	ts	•	ОН		•	44262-681	1	234853	
Fisher, Marie			7175 Cozy Rabbi	_			Anderson			ОН			43622-1298		234756	
Harris, Ruth			2003 Stony Necta				Kingsleys	-		ОН			45983-367		234843	
Hawkins, No			3763 Emerald Ro		/av		Apple Gro			ОН			45273-0588	3	234852	
Holmes, Hel			3869 Burning Fo		-			ailer Court		ОН			45202-979	7	234841	
Jenkins, Ger	rald	9	9393 Lost Field				Maple			ОН			43654-8273	3	234851	
Kennedy, Be	everly	3	3099 Umber Path	way			Damascu	s		ОН			44609-5908	3	234847	
King, James	•	3	3355 Rustic Clou	d Wynd			Yankee C	Crossing		ОН			45430-6188	3	234845	
King, James Lane, Arthur			3355 Rustic Clou 2331 Cozy Port	d Wynd			Yankee C	-		ОН			45430-6188 45620-598		234845	
	r	2						city						7		
Lane, Arthur	r icia	2 7	2331 Cozy Port	ory Stead			Holiday C	city		ОН			45620-598	7	234844	
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Lane, Arthur Martin, Patri Nichols, Jas	r cia on	2 7 9	2331 Cozy Port 7600 Shady Hick 9093 Hidden Pior	ory Stead neer Look Crescent	out		Holiday C Fort Jenn East Gard	city ings dens		он он он			45620-598 44170-284 43321-433	7 7 1	234844 234850 234848	
Lane, Arthur Martin, Patri Nichols, Jase Ramos, Jess	r cia on	2 7 9 9	2331 Cozy Port 7600 Shady Hick 9093 Hidden Pior 9166 Bright Pond	ory Stead neer Look Crescent Fownline	out		Holiday C Fort Jenn East Gard Belmore	city lings dens on		ОН ОН ОН			45620-598 44170-284 43321-433 45970-9899	7 7 1 9	234844 234850 234848 234840	



MAPS – NarxCare Report (continued)

02/01/2017	HYDROCODON-ACETAMINOPHN 1	0-325	60	15	Jo Rya	CVS	(0	600.00	40.00	Medicaid	ОН
01/23/2017	OXYCODONE-ACETAMINOPHEN 5	-325	60	7	Ma Fis	cvs	(0	450.00	64.29	Medicaid	ОН
01/12/2017	MORPHINE 2 N S/ML SYRINGE		1	30	No Hav	w Wall D		1	6.00	0.20	Private Pay	ОН
01/12/2017	MORPHINE 4 MASML SYRINGE		1	2	No Hav	w Wall D		1	12.00	6.00	Private Pay	ОН
01/10/2017	OXYCODONE-ACETAMINOPHEN 5	-325	120	30	Jo Rya	CVS	(0	900.00	30.00	Commercial PBM	ОН
01/07/2017	DEMEROL 25 MG/ML SYRINGE		1	2	Ja Kin	Wall D		1	7.50	3.75	Private Pay	ОН
01/03/2017	HYDROCODON-ACETAMINOPHEN	5-325	60	8	Ja Nic	CVS	(0	300.00	37.50	Medicaid	ОН
12/26/2016	HYDROCODON-ACETAMINOPHEN	5-325	60	8	Ja Nic	Wall D	(0	300.00	37.50	Commercial PBM	ОН
12/11/2016	HYDROCODON-ACETAMINOPHEN	5-325	28	5	He Hol	cvs	(0	140.00	28.00	Private Pay	ОН
12/07/2016	HYDROCODON-ACETAMINOPHEN	5-325	14	7	Pa Mai	r CVS	(0	70.00	10.00	Commercial PBM	ОН
12/07/2016	HYDROCODON-ACETAMINOPHEN	5-325	2	2	Pa Mai	r Wall D		1	10.00	5.00	Private Pay	ОН
11/07/2016	HYDROCODON-ACETAMINOPHEN	5-325	10	5	Pa Mai	r CVS	(0	50.00	10.00	Private Pay	ОН
11/06/2016	HYDROCODON-ACETAMINOPHEN	5-325	1	2	Ru Har	r Wall D		1	5.00	2.50	Private Pay	ОН
08/01/2016	OXYCODONE-ACETAMINOPHEN 5	-325	20	3	Br Fer	Wall D	(0	150.00	50.00	Commercial PBM	ОН
11/12/2015	MORPHINE 2 MG/ML SYRINGE		1	30	Pa Mai	r Wall D		1	6.00	0.20	Private Pay	ОН
Providers	Total Providers: 15											
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Name Fernandez, E Fisher, Marie Harris, Ruth Hawkins, Noi Holmes, Hele	Druce Drima en	4367 Pleasar 7175 Cozy R 2003 Stony N 6763 Emeral 8869 Burning	abbit Vista Nectar Cove d Robin Park g Fox Impass	-	Fix An Kir Ap Ba Ma	ve Points Inderson Ferry Ingsleys Corners Ingple Grove Inger Trailer Court		он он он он	\$	44262-681 43622-129 45983-367 45273-058 45202-979	1 234853 8 234756 3 234843 8 234852 7 234841 3 234851	÷
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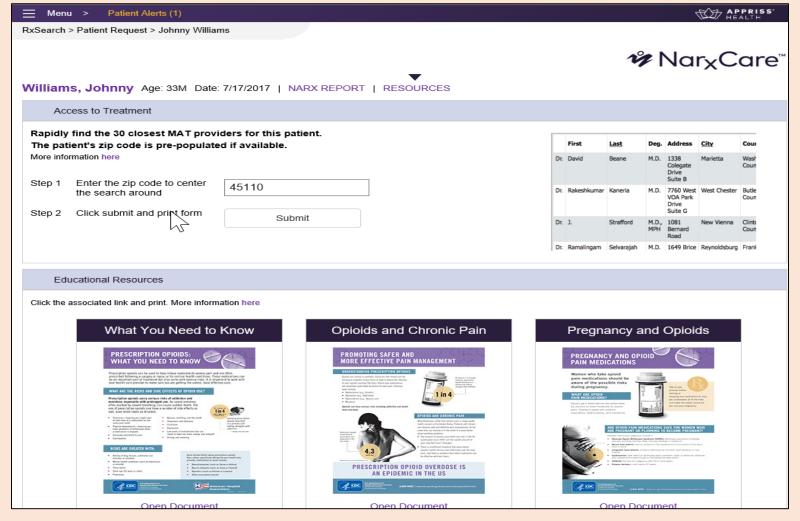
MAPS – NarxCare Report (continued)

Pharmacies	Total Pharmacies: 6										
Name	\$	Address	\$	City	\$	State	\$	Zipcode	\$	DEA	\$
cvs		5483 Gentle Impasse		Home Park		ОН		43242-6009		345796	
cvs		7139 High Pond Walk		Randolph Landing		ОН		45487-2143		345840	
Wall Drug		3799 Foggy Dale		Herner Corners		ОН		45658-6817		345841	
Wall Drug		4543 Iron Carrefour		Powers		ОН		43803-2784		345839	
Wall Drug		5639 Cotton Dale Close		Cedar Springs		ОН		43423-4846		345842	
Wall Drug		8129 Easy Dell		Antiquity		ОН		45300-0810		345843	

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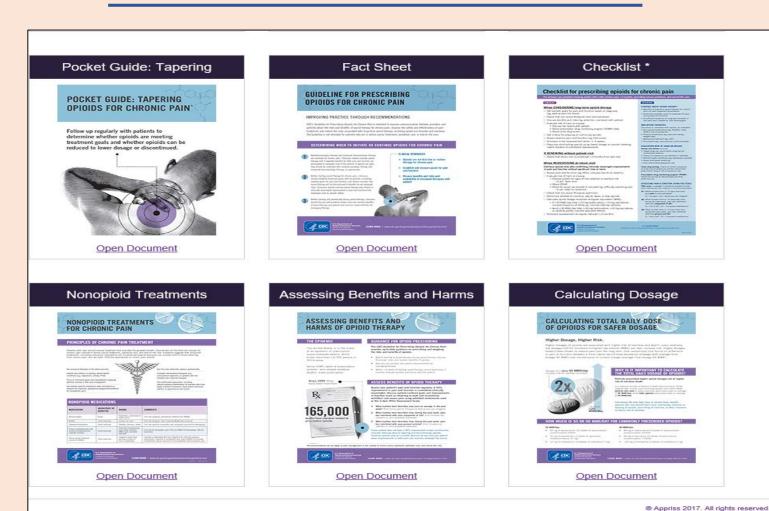


MAPS – NarxCare Resources





MAPS – NarxCare Resources





Bureau of Professional Licensing

Complaint & Enforcement Process

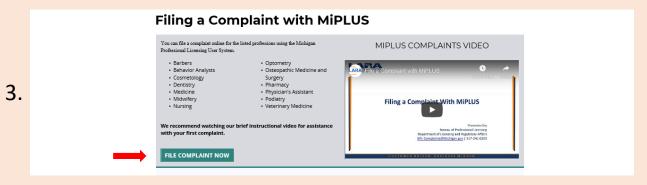


Filing A Complaint with BPL

Complaints can be filed on the Bureau website: www.Michigan.gov/bpl



FILE A COMPLAINT AGAINST A HEALTH CARE LICENSEE Acupuncture 5 Athletic Trainer 5 Behavioral Analyst Audiologist % Dentist/Hygienist/Dental Assistant Marriage and Family Therapist 5 Massage Therapist Midwifery Nursing Home Administrator Occupational Therapist % Physical Therapist 5: Pharmacist/Pharmacy/Pharmacy Technician Physician (M.D. or D.O.) Physician's Assistant Psychologist 5 Respiratory Therapist 5 Sanitarians 5 Social Worker Speech/Language Pathologist Veterinarian/Veterinary Technician





Overview of a Health Licensing Case

Allegation filed with the Bureau



In most cases, a panel of Board members reviews the allegation to decide if the case should be authorized for investigation

Bureau conducts an investigation



If the investigation reveals sufficient evidence of a Code violation, the Bureau or the Department of Attorney General may take a variety of actions, including: 1) an order to cease and desist; 2) an administrative complaint; 3) an order of summary suspension



If the investigation reveals no evidence of a Code violation, the case is closed and the parties are notified



What happens after an administrative complaint is issued?



The licensee may choose to meet with a Bureau representative for a compliance conference. A Board member may attend at the Bureau's discretion. The parties will attempt to resolve the case and submit terms for resolution to the Board for approval.



If the parties cannot resolve the case, an administrative hearing is scheduled at the Michigan Administrative Hearings System



Administrative Law Judge (ALJ) issues a proposal for decision (PFD)

*Except for a decision on a summary suspension, neither the findings of fact nor the conclusions of law are binding on the Board

If the Department proposes settlement terms:

- If Licensee agrees to terms, a Consent Order and Stipulation is drafted. After Licensee and the Department sign the document, it is forwarded to the Board's DSC for review
- The DSC either approves the Consent Order and Stipulation, making it legal and binding, or rejects it and proposes a counter offer



What happens after an administrative hearing?



The Board considers the PFD along with the evidence presented at hearing and determines whether the Bureau has proven a Code violation and what, if any, sanctions are appropriate



The Disciplinary Sub-Committee (DSC) of the Board either approves the Proposal for Decision making it legal and binding, dismisses the Administrative Complaint based on the ALJ's findings, or reverses the ALJ's finding and makes its own findings of fact and conclusions of law



Sanctioned licensees have an appeal by right to the Court of Appeals



Filing A Complaint with BPL- FAQs

Q: Do I have to report a colleague who may have violated the Public Health Code?

MCL 333.16222(1)

- A licensee or registrant who has knowledge that another licensee or registrant has committed a violation under section 16221, article 7, or article 8 or a rule promulgated under article 7 or article 8 shall report the conduct and the name of the subject of the report to the department.
- Failure of a licensee or registrant to make a report under this subsection does not give rise to a civil cause of action for damages against the licensee or registrant, but the licensee or registrant is subject to administrative action under sections 16221 and 16226.

Q: Will my identity remain confidential?

MCL 333.16222(2)

Unless the licensee or registrant making a report under subsection (1) otherwise agrees in writing, the identity of the licensee or registrant making a report under subsection (1) shall remain confidential unless disciplinary proceedings under this part are initiated against the subject of the report and the licensee or registrant making the report is required to testify in the proceedings.

Q: Do I have to report a colleague who may be impaired?

MCL 333.16223

- ... a licensee or registrant who has reasonable cause to believe that a licensee, registrant, or applicant is impaired *shall* report that fact to the department.
- A licensee or registrant who fails to report under this subsection is not liable in a civil action for damages resulting from the failure to report, but the licensee or registrant is subject to administrative action under sections 16221 and 16226.
- A licensee or registrant who in good faith complies with this section is not liable for damages in a civil action or subject to prosecution in a criminal proceeding as a result of the compliance.



UPDATE: Michigan Board of Pharmacy Controlled Substance Administrative Rules



Michigan Board of Pharmacy Rule Update

• Effective **January 4, 2019** Neurontin (gabapentin) is a Schedule 5 controlled substance in the State of Michigan. Further information about this can be found in <u>Michigan Board of</u> Pharmacy Administrative Rule 338.3125

Mandatory reporting:

Any controlled substance that is dispensed

*Dispensing Physicians are required to report only supplies that exceed at 2-day supply

Mandatory MAPS review:

When it is prescribed in excess of a 3-day supply



Legislative Action: Michigan Opioid and Controlled Substance Laws



Public Acts 246-250 of 2017

Public Acts	Description
Public Act 246 of 2017	Requires the disclosure of prescription opioid information and risks to minors and patients, beginning 6/1/18.
Public Act 247 of 2017	Requires prescribers to be in a bona fide prescriber-patient relationship prior to prescribing Schedules 2-5 controlled substances. These provisions were due to take effect on 3/31/18, however the implementation date has been pushed back by Public Act 101 of 2018. EFFECTIVE: JANUARY 1, 2019
Public Act 248 of 2017	Requires the review of MAPS prior to prescribing or dispensing to a patient a controlled substance in a quantity that exceeds a 3-day supply, beginning 6/1/18. Further, the act requires that a licensed prescriber be registered with MAPs prior to prescribing or dispensing a controlled substance to a patient, beginning 6/1/18.
Public Act 249 of 2017	Provides sanctions for failing to comply with the new MAPS usage mandates, failure to establish bona fide prescriber-patient relationships, and failure to inform patients regarding the risks associated with prescription opioid drugs.
Public Act 250 of 2017	Requires health professionals that treat patients for opioid-related overdoses to provide such patients with information regarding Substance Use Disorder Services, beginning 3/27/18.



Public Acts 251-254 of 2017 and Public Act 101 of 2018

Public Acts	Description
Public Act 251 of 2017	Requires prescribers treating patients for acute pain to not prescribe such patients with more than a 7-day supply of an opioid within a 7-day period, beginning 7/1/18
Public Act 252 of 2017	Provides that before dispensing or prescribing buprenorphine or a drug containing buprenorphine and methadone to a patient in a substance use disorder program, the prescriber shall review a MAPS report on the patient, beginning 3/27/18.
Public Act 253 of 2017	Codifies Medicaid coverage for detox programs, beginning 3/27/18.
Public Act 254 of 2017	Requires the Prescription Drug and Opioid Abuse Commission (PDOAC) to develop for Michigan's Department of Education (MDE) recommendations for the instruction of pupils on the dangers of prescription opioid drug abuse, by 7/1/18.
Public Act 255 of 2017	Requires MDE to make available to school districts a model program of instruction on the dangers of prescription opioid abuse, developed or adopted by the PDOAC, by 7/1/19. Further, beginning in the 2019-2020 school year, MDE shall ensure that the state include within its health education standards, instruction on prescription opioid drug abuse.
Public Act 101 of 2018	Pushes back the effective date for the bona fide prescriber-patient relationship requirement to 3/31/19, or if rules are promulgated to provide alternatives to the prescriber-patient requirement before 3/31/19, on the date on which rules are promulgated.



2019 Legislation Updates

PUBLIC ACTS 42 and 43 of 2019 were signed into law and took effect on July 8, 2019.

Amend requirements related to reviewing MAPS information as well as requirements for the bona fide prescriber- patient relationship.



PUBLIC ACT 42 OF 2019

SB 128(H-2)

Exempts patients under the care of hospice from being subject to the bona fide prescriber-patient relationship requirements.

- Defines "Bona Fide Prescriber-Patient Relationship" as a treatment or counseling relationship between a prescriber and a patient in which both of the following are present:
 - Prescriber has reviewed the patient's medical records and completed an *assessment* of the patient's medical history and current medical condition, including a medical evaluation of the patient. This can be conducted in person or via telehealth as that term is defined in 333.16283.
 - Prescriber has created and maintained records of the patient's condition in accordance with medically accepted standards.

*definition was moved to MCL 333.7104 and included a change in language from "full assessment" to "assessment", via PA 43 of 2019



PUBLIC ACT 43 OF 2019

HB 4225(S-1)

Exempts patients who are under the care of hospice from being subject to:

- The bona fide prescriber-patient relationship requirement necessary for prescribing a controlled substance in schedules 2-5.
- The requirement to obtain a MAPS report prior to prescribing a controlled substance in schedules 2-5 that exceeds at 3-day supply. *When a report was obtained and reviewed at the time the patient was admitted to hospice.

*strikes from MCL 333.7303a the definition for bona fide prescriber-patient relationship and moves it to MCL 333.7104



For Additional Legislative Information

- Individuals seeking additional information regarding the new opioid laws can visit http://www.legislature.mi.gov and do the following:
 - Select "Public Act (Signed Bills)" among the options under the "Legislature" category on the left of the page.
 - On the "Public Acts" webpage, enter the Public Act Number, and select a "Public Act Year" below. For example, to find more information regarding Public Act 247 of 2017, Enter "247" in the search box, and select the "Public Act Year" from the dropdown box as "2017". Select "Search" when ready.
- A direct link to the above referenced "Public Act (Signed Bills)" search page is as follows:
 - http://www.legislature.mi.gov/(S(gfsic4rztsd0vhcpbmxfjwvy))/mileg.aspx?page=PublicActs.



Contacts for MAPS

For technical assistance, please contact Appriss' customer first center at:

• 844-364-4767

For policy or administrative assistance and more information about integrating with MAPS, please contact MAPS support:

- 517-241-0166 or <u>BPL-MAPS@Michigan.gov</u>
- Info: www.Michigan.gov/bpl, click on MAPS
- Integrations: Click on Software Integration Resources

For additional resources for providers and the public, please go to the State website: www.michigan.gov/opioids



Questions?

