

# PMP FAQs

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## GENERAL FAQs

Question: What is the Iowa Prescription Monitoring Program (PMP)?

Answer: The Iowa PMP collects records of controlled substance (Schedules II through V) prescriptions dispensed by Iowa-licensed pharmacies and dispensing prescribers and makes that information available to registered prescribers and pharmacists (practitioners) to assist those practitioners in making informed decisions about a patient's care and treatment. The PMP provides another resource to assist the practitioner in identifying potential diversion, misuse, or abuse of controlled substances without impeding the appropriate medical use of controlled substances.

Question: Who is responsible for oversight and operation of the PMP?

Answer: The Iowa Board of Pharmacy co-manages the Iowa PMP with the PMP Advisory Council.

Question: What is the PMP Advisory Council?

Answer: The PMP Advisory Council provides oversight of the PMP, including its mission and operations. It is composed of nine Board-appointed members, which may include, but need not be limited to: a pharmacist, a physician, a nurse practitioner, a physician assistant, a dentist, a veterinarian, a delegate, an individual who is eligible to utilize the PMP in an investigative capacity, such as a law enforcement official, licensing authority representative, or medical examiner, and a member of the public-who is otherwise not eligible to register with the PMP. Members are appointed for a three-year term.

Question: What are the duties of the PMP Advisory Council?

Answer: The duties of the council include but are not limited to the following:

1. Ensuring the confidentiality of the patient, prescriber, and dispensing pharmacist and pharmacy.
2. Respecting and preserving the integrity of the patient's treatment relationship with the patient's health care providers.

3. Encouraging and facilitating cooperative efforts among health care practitioners and other interested and knowledgeable persons in developing best practices for prescribing and dispensing controlled substances and in educating health care practitioners and patients regarding controlled substance use and abuse.
4. Making recommendations regarding the continued benefits of maintaining the program in relation to cost and other burdens to the patient, prescriber, pharmacist, and the board.
5. One physician and one pharmacist member of the council include in their duties the responsibility of monitoring and ensuring that patient confidentiality, best interests, and civil liberties are at all times protected and preserved during the existence of the program.

Question: What is the website or web address for the PMP?

Answer: <https://iowa.pmpaware.net/login>

Question: How is the confidentiality of prescription information protected?

Answer: Before anyone is permitted to access the PMP, the individual must complete and submit a registration application. Qualifications of the individual, including professional license number, DEA registration number, and other identifiers are verified prior to approval of the registration and the granting of login credentials. All registrants agree to the terms of use and confidentiality before accessing or requesting any information from the PMP. PMP data is protected by the highest data security standards and access to data is restricted to authorized, registered individuals.

Question: What is the legal authority for the PMP?

Answer: The PMP was established and operates pursuant to the provisions of Iowa Code sections 124.550 through 124.558.

Question: As a patient, can I opt out of having my data in the PMP?

Answer: No. Iowa Code section 124.552 requires that dispensers report all controlled substance prescriptions, unless prohibited under federal law, to the PMP. The Code does not include provisions for opting out of including a patient's controlled substance prescriptions in the PMP data.

Question: What information is contained in the Iowa PMP database?

Answer: Records of all Schedule II through V controlled substance prescriptions dispensed to patients by Iowa pharmacies and dispensing prescribers are included in the PMP. This also includes the dispensing of all OTC scheduled products. In addition, records of prescriptions for and the administration of opioid antagonists, such as naloxone, are included in the Iowa PMP.

Question: Who is submitting the prescription data?

Answer: Iowa-licensed pharmacies, including in-state and nonresident pharmacies, submit prescription data. Dispensing prescribers report controlled substances

dispensed to patients by the prescriber. Any pharmacy, prescriber, or first responder who dispenses or administers an opioid antagonist, such as naloxone, also submits those records to the PMP.

Question: How long is information retained in the PMP database?

Answer: Information and records are maintained in the PMP for at least four (4) years from the date of the record.

Question: Who has access to the PMP data?

Answer: Pharmacists and prescribers may access a patient's PMP records if the pharmacist or prescriber is actively engaged in the patient's healthcare.

Question: Are prescribers and/or dispensers required to use the PMP database?

Answer: Prescribers are required to register to use the PMP but neither prescribers nor pharmacists are required to use the PMP unless use is required by the individual's professional licensing authority. Note, as of February, 2020, The Iowa Boards of Medicine, Nursing, Physician Assistants, Optometry, Podiatric Medicine, Psychology and Iowa Dental Board all have mandates requiring the use of the PMP before authorizing an opioid prescription. Please see respective licensing Board regulations for requirements and exceptions (e.g., hospitalized patients, hospice patients, long-term care residents, et al).

Question: Can Law Enforcement request PMP data?

Answer: Pursuant to an order, subpoena, or other means of legal compulsion based upon a determination of probable cause in the course of a specific investigation of a specific individual, PMP data can be released to law enforcement.

Question: Can a patient request their own PMP (prescription history) data?

Answer: Yes. The form to be completed by the patient or the patient's legal agent is available on the Board's website at <https://pharmacy.iowa.gov/prescription-monitoring-program> under Patient Request for PMP Information.

Question: Can a person request prescription history be sent to a third party (e.g., attorney's office)?

Answer: Yes, a person may request their own prescription history be sent to the person's legal agent.

Question: I received my prescription history report and the information is incorrect, how do I get the information corrected?

Answer: Please contact the pharmacy or dispensing prescriber that reported the incorrect information and request they verify and resubmit a corrected record.

Question: Does the PMP limit a patient's access to prescription drugs?

Answer: No, limiting or restricting patient access to needed medications is not the purpose or intent of the PMP. The PMP is designed as a clinical tool to provide practitioners with additional patient level information. A primary goal of the PMP is to lead to more rational prescribing and better patient care. In some instances, this may mean either a decrease or an increase in the prescribing of controlled substances for an individual patient as determined by the prescriber.

Question: Is data maintained in the PMP database used to identify "inappropriate" prescribing by practitioners?

Answer: Not directly. Prescribing information and practices are not "policed" for the purpose of identifying inappropriate or indiscriminate prescribing or dispensing. A regulatory agent may request pertinent information from the PMP when the agent attests to and provides a subpoena, order, or warrant, based on a determination of probable cause, in the course of an existing investigation of a specific individual.

### **PMP REGISTRATION FAQs**

Question: Who is required to register for the PMP?

Answer: Iowa practitioners (excluding veterinarians and researchers) who hold an Iowa Controlled Substances Act (CSA) Registration are required to register for the PMP at the time they renew or are issued a new CSA registration. Iowa-licensed pharmacists who are involved in patient care are required to register for the PMP at the time they become licensed or renew their license.

Question: What is the website to register for the PMP?

Answer: <https://iowa.pmpaware.net/login>

Question: Does it cost anything to register for the PMP?

Answer: No, there is no cost to register for the PMP.

Question: Do I need to renew my PMP registration on a periodic basis?

Answer: No, you do not need to renew your PMP registration.

Question: I am a fully-licensed practitioner but I do not have my own DEA number. Can I register to use the PMP? If so, what role do I select during the registration process?

Answer: Yes. You may register under the role "Prescriber-Institution Affiliate/No Independent DEA Number." You will be required to enter your institution's DEA number followed by the unique suffix (e.g., CLP or NPI) they have assigned you.

Question: I am a resident physician and prescribe under my hospital's institutional DEA and CSA number. Can I register to use the PMP? How do I register?

Answer: Yes. You may register under the role “Medical Resident with Prescriptive Authority.” You will be required to enter your institution’s DEA number followed by the unique suffix (e.g., CLP or NPI) they have assigned you.

Question: I am registered as a medical resident but am now a licensed physician. Do I need to register again?

Answer: No. The role on your existing account can be changed. Please contact a PMP administrator at 515-281-5944 or [pmp@iowa.gov](mailto:pmp@iowa.gov) with your permanent professional license number and personal DEA number.

Question: How do I register as a delegate?

Answer: All users, including delegates, register online at <https://iowa.pmpaware.net/login>. Delegate users will select the role “Prescriber Delegate - Licensed.” You will be required to provide your license/certification/registration number as a healthcare professional and identify at least one supervising provider by entering their PMP email address. The supervising provider(s) will receive an email notifying them that you have registered. The supervising provider(s) must then log into their PMP account and approve you.  
(For more information, see ([Delegate user FAQs](#)))

Question: Can out of state pharmacists have access to the PMP?

Answer: Yes. If they are dispensing to Iowa patients, they may register under the role “Out of State Pharmacist.” They must provide their professional license number and employer DEA number.

Question: Can out of state prescribers have access to the PMP?

Answer: Yes. They may register under the role “Out of State Prescriber.”

Question: I am new to practicing or prescribing controlled substances in Iowa and do not have a DEA or Iowa CSA yet. How do I register?

Answer: You will need to first apply for and be issued your Iowa CSA registration and then federal DEA registration before you will be permitted to register to use the PMP.

Question: When trying to renew my Iowa CSA registration online, I get a message that I am not PMP registered. What should I do?

Answer: Please contact a PMP administrator at 515-281-5944.

Question: What should I do if I tried to create a new account and got an error message that said, “There was a problem with the email you attempted to use. If you believe there is already an account associated with this email address, use the reset password feature to continue your registration.”?

Answer: At the PMP website, click "Reset Password." You will be required to enter the email address associated with your existing PMP account. A link will be emailed to you to set up a new password.

Question: What should I do if I am retired, have moved out of state, allowed my CSA registration or pharmacist license to lapse, or am reaching out on behalf of a deceased provider?

Answer: Please contact a PMP administrator at 515-281-5944 or [pmp@iowa.gov](mailto:pmp@iowa.gov) for deactivation of your account.

Question: Why am I required to select a healthcare specialty when registering with the PMP?

Answer: Practitioners are required to select a healthcare specialty when registering for the PMP to facilitate comparison reports, research and data analytics.

### **PMP ACCESSING AND USING FAQs**

Question: I'm registered with the PMP, but I don't remember my password. What should I do?

Answer: At the PMP website, click "Reset Password." You will be required to enter the email address associated with your PMP account. A link will be emailed to you to set up a new password.

Question: I no longer have access to the email address on my account and my password has expired. What should I do?

Answer: Please contact a PMP administrator at 515-281-5944 or [pmp@iowa.gov](mailto:pmp@iowa.gov).

Question: How do I reactivate my account?

Answer: Please contact a PMP administrator at 515-281-5944 or [pmp@iowa.gov](mailto:pmp@iowa.gov).

Question: Can I view data from other states?

Answer: PMP users registered as healthcare professionals (i.e., prescribers, pharmacists, delegates) may query other states' PMPs by selecting those states at the bottom of a patient request in the section titled "PMP InterConnect Search." To set up your patient request to automatically select other states, log in to your account and at the top right, click your name, then "Default PMPi States." Select which state(s) you would like to automatically include in every patient request.

Question: As a prescriber, can I search for prescriptions dispensed with my DEA number?

Answer: Yes. When logged in to your PMP account, click "Menu," then click "MyRx" (under "RxSearch") and enter the date range you would like to search.

Question: Why do I not see a prescription dispensed for my patient when I know my patient filled the prescription?

Answer: If you know which pharmacy filled the prescription, please contact the pharmacy to verify the prescription record and the pharmacy's submission to the PMP.

Question: What if a prescription reported to the PMP was reported or dispensed incorrectly?

Answer: The prescriber should contact the dispensing pharmacy or reporting dispenser for additional details about the prescription. Upon notification of a potential error in PMP information, the pharmacy or dispensing prescriber is required to promptly correct the record in the PMP.

Question: What if a patient has had prescriptions filled under multiple names?

Answer: Patient IDs can be manually consolidated by PMP administrators. Please contact PMP administrator at 515-281-5944 or [pmp@iowa.gov](mailto:pmp@iowa.gov).

Question: Can I place a copy of the PMP report in the patient's EHR/EMR?

Answer: Yes, it is acceptable to copy and place a PMP report or a synopsis into a patient chart if the purpose of doing so is related to that patient's healthcare, subject to the privacy policy and procedures of your facility, office or pharmacy.

Question: Does the PMP include data from the Veterans Administration (VA) Pharmacies?

Answer: Yes, VA pharmacies are required to submit prescription data to the PMP.

Question: What should I do if I am concerned about my patient's controlled substance use?

Answer: Discuss your concerns with the patient and other practitioners involved in the patient's care. The NarxCare® Report contains resources such as communication with the patient's other providers and links to treatment facilities. If prescription fraud is suspected, contact your local law enforcement.

Question: How far back in a patient's prescription history can I request a PMP report?

Answer: PMP data is retained and can be queried up to 4 years from the date of the request.

Question: What is a NarxCare® Report?

Answer: NarxCare® is a tool and care management platform that helps prescribers and dispensers by automatically accessing the PMP data, analyzing and scoring it, and generating an interactive report that enables providers to quickly comprehend the patient's controlled substance use history.

## **PMP REPORTING FAQs**

Question: Which prescriptions must be reported to the PMP?

Answer: "Reportable prescription" means the record of a controlled substance dispensed by a practitioner, over the counter schedule V products, and the record of an opioid antagonist dispensed by a practitioner or administered by a first responder.

Question: What prescription information is reported to the PMP?

Answer: The information required for each prescription includes, at a minimum, the following items:

- a. Dispenser DEA number.
- b. Date the prescription is dispensed or administered.
- c. Prescription number or unique identification number.
- d. NDC number of the drug dispensed or administered.
- e. Quantity of the drug dispensed or administered.
- f. Number of days of drug therapy provided by the drug dispensed or administered.
- g. Patient legal first and last names.
- h. Patient address including street address, city, state, and ZIP code.
- i. Patient phone number.
- j. Patient date of birth.
- k. Patient gender.
- l. Prescriber name and DEA number.
- m. Date the prescription was issued by the prescriber.
- n. Method of payment.
- o. Form of transmission of prescription origin.
- p. Refill number.
- q. Number of refills authorized.
- r. Indication as to whether the prescription is new or a refill.

Question: How frequently must data be submitted to the program?

Answer: A record of each reportable administration or prescription dispensed must be submitted by each dispenser no later than the next regular business day following administration or dispensing.

Question: Are hospital pharmacies required to report to the PMP when dispensing for inpatient use?

Answer: No, the dispensing by a licensed hospital pharmacy for the purposes of inpatient hospital care is exempt.

Question: When is reporting to the PMP not required?

Answer: Reporting of dispensing or administration of a controlled substance is not required when dispensed for inpatient hospital care, for long term care or hospice facility patient care, or when administered by a prescriber for outpatient procedures or treatment.

Question: Is anyone exempt from reporting to the PMP?

Answer: Yes, a pharmacy that does not dispense controlled substances to patients in Iowa, a licensed veterinarian who administers or dispenses a controlled substance in the



normal course of professional practice, a registered hospice facility, and a DEA-registered narcotic treatment program subject to the record-keeping provisions of federal law are exempt from PMP reporting.

Question: I have a pharmacy but I rarely dispense controlled substances. Do I still need to report?

Answer: Yes, unless otherwise exempt, a pharmacy that did not dispense any reportable prescriptions during a reporting period (i.e., a business day) is required to submit a zero report no later than the next regular business day.

Question: Are dispensing prescribers required to report dispensations to the PMP?

Answer: Yes, unless otherwise exempt, a dispensing prescriber is required to submit to the PMP a record of each reportable controlled substance dispensed no later than the next regular business day. The prescriber shall be identified as the dispenser (pharmacy) when reporting to the PMP.

Question: How do dispensing prescribers report to the PMP?

Answer: Dispensing prescribers have two options to report to the PMP. Records may be submitted through the prescriber's AWARxE® account: login to PMP AWARxE® > Click "Menu" > "Data" > "Rx Management" and "New Rx." The prescriber shall be identified as the dispenser (pharmacy).

Prescribers may also register for a PMP Clearinghouse account at: [https://pmpclearinghouse.net/users/sign\\_in](https://pmpclearinghouse.net/users/sign_in). A registered prescriber or delegate can submit records using an electronic Universal Claim Form or submit records via sFTP. More information can be found at: <https://pharmacy.iowa.gov/prescription-monitoring-program> under "Training, User Guides and Reference Materials."

Question: If a prescriber dispenses a "starter pack," would this be considered prescriber dispensing?

Answer: Yes, starter packs otherwise meeting the definition of a reportable prescription are required to be reported to the PMP.

Question: Are methadone treatment clinics required to report in-office dispensing?

Answer: DEA-registered narcotic treatment programs subject to federal record-keeping provisions of 21 CFR Section 1304.24 are exempt from PMP reporting.

Question: Are prescriber in-office dispensations of Suboxone® required to be reported?

Answer: Yes, unless the prescriber is subject to federal record-keeping provisions of 21 CFR Section 1304.24.

Question: Do I have to notify patients that their prescription information is being reported to the PMP?

Answer: No, although some entities do include such a notification in their HIPAA disclosure.

Question: How do I correct an error in a previously submitted record? E.G., the prescription was filled and previously reported using the wrong Dr. Smith.

Answer: Corrections may be made by data submitters by uploading a new file via sFTP, having your software vendor submit a corrected report on your behalf or by logging directly into your AWAxE® account. If making corrections in your AWAxE® account (usually the easiest approach to correct a single prescription), login to PMP AWAxE®, Click “Menu” > “Data” > “Rx Management” and “Rx Maintenance” and submit the changes.

### **DELEGATE USER FAQs**

Question: Can unlicensed staff (i.e. receptionist) register for the PMP as delegates?

Answer: No. Only health care professionals are eligible for PMP registration. Per Board of Pharmacy rules, “Healthcare professional” means a person who, by certification, registration, or licensure, is qualified to provide and is engaged in providing health care to patients. “Healthcare professional” does not include clerical or administrative staff. A health care professional shall be credentialed in a manner that permits verification and regulation of the health care professional’s credentials.

Question: Who can register as a PMP delegate?

Answer: Delegate PMP users may include, but are not limited to: RNs, LPNs, certified medical assistants, radiologic technologists, paramedics, certified alcohol and drug counselors, pharmacist-interns, and certified pharmacy technicians.

Question: The office I work in has numerous prescribers. Do I need to register as a delegate user for each prescriber that I work under? Why is this important?

Answer: Yes. It is important that delegate users register under each prescriber for whom they may need to request patient data. When delegate users begin a patient request, they must select a supervisor/prescriber from the dropdown at the top of the screen. This action will reflect that the identified prescriber requested the patient’s report.

Question: What if I am doing searches for a prescriber who is not currently listed as one of my supervisors?

Answer: You may not perform a search for a prescriber who has not authorized you as their personal delegate.

Question: Why is it important to select the correct supervisor when conducting a PMP search?

Answer: It is vital that the PMP records correctly identify the prescriber who requested the patient’s report. This is important to provide an audit trail and verify provider use of

the PMP. The identified prescriber is responsible for your actions when conducting a PMP search.

Question: As a delegate, how do I add additional supervising providers?

Answer: In your PMP account, under “Menu” > “User Profile” > “My Profile,” additional supervising providers can be added in the “Supervisors” section by entering the provider’s PMP email address. The supervising provider(s) will receive an email notifying them that you have registered as their delegate. The supervising provider(s) must then log into their PMP account and approve you.

### **SUPERVISOR OF DELEGATE(S) FAQs**

Question: Can a delegate access data on my behalf?

Answer: Yes. A delegate may perform PMP patient queries on behalf of a supervising practitioner who has prescribed or is contemplating the authorization of a prescription for the patient about whom information is requested. The delegate must log in to their own account to perform the query and may not access the practitioner’s PMP account to run the request.

Question: Can I have multiple delegates linked to my account?

Answer: Yes. A practitioner may authorize an adequate number of healthcare professionals who actively work with the practitioner to act as their delegates to request PMP information. A delegate shall be licensed, registered, certified, or otherwise credentialed as a healthcare professional in a manner that permits verification and regulation of the delegate’s credentials. The practitioner shall be responsible for the PMP information accessed by their delegates.

Question: How do I approve a delegate?

Answer: You can approve a delegate by logging into your Iowa PMP AWARe® account, click “Menu” > Select “Delegate Management.” The Delegate Management page will display new delegates with a status of “Pending.” Click the delegate’s name to display their information on the detail card at the bottom of the page. Click the “Approve” button to approve the delegate. If you do not wish to approve a delegate request simply click “Reject.”

Question: How do I reject or remove a delegate?

Answer: In order to remove a delegate you had previously approved, log into your Iowa PMP AWARe® account > Click “Menu” > Select “Delegate Management” > Click the delegate’s name to display their information > Click the “Remove” button. Upon removal, the delegate’s status will be returned to “Pending.” If you need to completely dissociate a delegate from your account, select the former delegate, then click “Reject.”

Question: Is there a way to see which patients a delegate searched for under my authorization?

Answer: Yes. Within the AWARxE® system, Click “Menu” > “Requests History” and the Requests History page will be displayed. The “Requestor” column will list the name of a delegate if the query was performed by someone other than yourself.

Question: I have removed/disabled a delegate(s), can I still audit or view the searches they performed on my behalf?

Answer: Yes. Within the AWARxE® system, Click “Menu” > “Requests History” and the Requests History page will be displayed. The “Requestor” column will list the name of a delegate if the query was performed by someone other than yourself.

Question: I performed an audit on one of my delegate’s PMP queries and discovered inappropriate searches, what do I do now?

Answer: It is at your discretion how to proceed. Best practice would be to remove the delegate’s access to the PMP under your authority and to report the inappropriate use of the PMP to the organization that licenses or credentials the delegate. (i.e. Board of Nursing, American Association of Medical Assistants, Board of Pharmacy, etc.)

Question: Does the PMP notify supervisors of excessive or improper searches by their delegates?

Answer: No. It is the responsibility of the supervising practitioner to actively maintain their delegate list and monitor use or remove your delegated access as necessary.

## **PRESCRIBER ACTIVITY REPORT (PAR) FAQs**

Question: What is a Prescriber Activity Report?

Answer: A Prescriber Activity Report (PAR) is a quarterly snapshot of a practitioner’s prescribing practices involving Schedule II-V medications over a six-month period. See the PAR user guide for additional information at <https://pharmacy.iowa.gov/prescription-monitoring-program> under “Training, User Guides, and Reference Materials.”

Question: Why does the Board of Pharmacy’s Prescription Monitoring Program (PMP) provide PARs?

Answer: The Prescriber Activity Report (PAR) is intended to give prescribers insight into their controlled substance prescribing patterns by supplying a summary of their prescribing along with a comparison to their practice specialty group peers.

Question: How will I receive the Prescriber Activity Report?

Answer: You will receive an email notifying you that your quarterly Prescriber Report is now available in your Iowa PMP (AWARxE®) account. Reports are provided to all registered PMP users who have an active account, a defined role and specialty, and have written at least one opioid, sedative, or stimulant prescription during the prior six-month period. The notification is sent directly to your email that you have on file with the Iowa PMP.

Question: How often will I receive a Prescriber Activity Report?

Answer: Approximately every three months.

Question: Is the Prescriber Activity Report confidential?

Answer: Yes, the information in the Prescriber Activity Report is privileged and confidential.

Question: What information is included in the Prescriber Activity Report?

Answer: Information in the Prescriber Activity Reports includes summary data regarding your prescribing of opioids, top medications prescribed by you, comparisons with healthcare specialty peer groups, PMP usage (patient queries) by you and your delegates, and various prescription and patient data for other controlled substances.

Question: Are prescriptions for Suboxone® included or excluded from the data in the Prescriber Activity Report?

Answer: Prescriptions for Suboxone® dispensed from a pharmacy or non-exempt treatment facility are included in the Prescriber Activity Reports.

Question: Who determined the healthcare specialty used in my Prescriber Activity Report?

Answer: The healthcare specialty was self-selected when you registered for a PMP AWARxE® account.

Question: What if I selected multiple healthcare specialties?

Answer: The Prescriber Activity Report will use only your primary healthcare specialty for peer comparisons.

Question: How do I change the Healthcare Specialty used in my Prescriber Activity Report?

Answer: You may update your Healthcare Specialty within your PMP AWARxE® account. Log in to the PMP site. Click "Menu" > Select "My Profile" under User Profile and update your Healthcare Specialty. Changes will be reflected in the next distribution of your Prescriber Activity Report.

Question: How can I view a list of the prescriptions included in my Prescriber Activity Report?

Answer: Log into the PMP site. Click "Menu" > Select "MyRx" under RxSearch. Enter the applicable six-month date range, and select the DEA number associated with your Prescriber Activity Report. This will allow you to see a full list of prescriptions that were included within the report metrics.

Question: What if I believe there is an error on my MyRx prescription history?

Answer: Please contact the dispensing pharmacy directly and have them submit a correction.

Question: What should I do if I suspect my DEA number is being used to forge prescriptions?

Answer: Please contact the dispensing pharmacy directly to verify. You should follow up with the appropriate law enforcement agency and the DEA's Submit a Tip website at <https://www.dea.gov/submit-tip> if you discover forgeries have occurred.

Question: I have delegates conduct searches for all of my patients. Why are these searches not credited in my delegate search count?

Answer: If your delegate has multiple supervisors, it is likely they selected the wrong supervisor. When delegate users begin a patient search, they must select the requesting supervisor/prescriber from the dropdown menu at the top of the screen. This action will credit the selected prescriber with requesting that patient report. It is important to remind delegates to select the correct supervisor when conducting a PMP query.

Question: Can my Prescriber Activity Report be used against me?

Answer: No, The Prescriber Activity Report is not subject to discovery, subpoena, or other means of legal compulsion.

Question: Why is it referred to as a "quarterly report," when it appears to be utilizing six months of data?

Answer: The "quarterly report" refers to the time frame in which the reports are sent out, i.e., approximately every three months or quarterly.

### **PROACTIVE PATIENT ALERT FAQs**

Question: What is a Proactive Patient Alert or Threshold Report?

Answer: A Proactive Patient Alert (Threshold Report) is a notification indicating that one or more of your patients has exceeded a set threshold and appears to be receiving multiple Schedule II-V prescriptions from multiple pharmacies and prescribers in a given time period. Iowa Code gives the Iowa Board of Pharmacy, in collaboration with the PMP Advisory Council, the authority to establish criteria for reporting information about a patient to practitioners involved with the prescriptions in question if the threshold criteria are met.

Question: What are the differences between a Prescriber Activity Report (PAR) and a Proactive Patient Alert (Threshold Report)?

Answer: A Prescriber Activity Report is intended to give prescribers insight into their controlled substance prescribing patterns and a comparison with their peers. Reports are provided approximately every three months to all registered PMP users with an active account, a defined role and specialty, who have written at least one controlled substance prescription during the prior six-month period. The data represented includes schedule II-V prescriptions reported to the state PMP during the report period.

A Proactive Patient Alert (Threshold Report) is sent to all prescribers and pharmacies who have prescribed or dispensed controlled substances to patients who meet predetermined thresholds. Proactive Patient Alerts (Threshold Reports) are disseminated to help ensure that prescribers are aware of the scope of controlled substance use by their patients, thus contributing to optimum patient care.

Question: Who determines the thresholds used to generate the Proactive Patient Alert (Threshold Report)?

Answer: The Iowa Board of Pharmacy, in collaboration with the PMP Advisory Council, determines the thresholds.

Question: What do I do if I receive a Proactive Patient Alert (Threshold Report)?

Answer: You are not obligated to take any action in response to the alert. You should use your professional judgment in determining any subsequent action.

Question: What if the patient listed on the Proactive Patient Alert (Threshold Report) is not my patient?

Answer: Data submitted to the PMP comes directly from the dispensing pharmacy. If you did not prescribe to the individual in question, log in to the PMP and perform a "MyRx" search. Identify the errant prescriptions attributed to your DEA number and contact the dispensing pharmacy directly.

Question: Why should I have to perform a query once I receive a Proactive Patient Alert (Threshold Report)? Can't you just send the patient's prescription history to me?

Answer: The PMP limits patient information sent electronically due to privacy issues. Currently, the PMP does not have the functionality to run a query and save it in your PMP account for you to view.

Question: What if I want to inform the police regarding an individual after receiving a Proactive Patient Alert (Threshold Report)?

Answer: Proactive Patient Alerts (Threshold Reports) are not intended to get individuals in trouble. However, if you confirm fraudulent prescriptions were written or a patient is blatantly misusing the healthcare system, it is your decision on how you want to proceed. Proactive Patient Alerts (Threshold Reports) cannot be shared with law enforcement. Law enforcement can request PMP records, if warranted by an investigation, with a subpoena or court order.

Question: Can I unsubscribe from receiving Proactive Patient Alerts (Threshold Reports)?

Answer: Currently, there is no opting out of receipt of Proactive Patient Alerts (Threshold Reports). The legislature authorizes the Iowa PMP to send these alerts to prescribers and dispensers for their patients exhibiting questionable controlled substance activity to assist in informed determination of appropriate treatment. It is your choice on how to respond to Proactive Patient Alerts.

Click to submit a new FAQ to the Iowa PMP: [PMP@iowa.gov](mailto:PMP@iowa.gov)