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The Vermont Prescription Monitoring System (VPMS) was implemented in 2009 to support health care providers' clinical decision--making for prescribing and dispensing. Pharmacies are required to report dispensations of Schedule II-IV controlled substances to VPMS. These data are the backbone of VPMS, and pharmacies play a crucial role in ensuring that the data is clean, timely and accurate.

The questions below are some of the most frequently asked, and this document will be updated with questions regularly. Please check the <u>Data Submission Guide</u> on the <u>VPMS</u> <u>health department website</u> for more specific information about signing up for a submission account, required and optional data elements, and other details.

Regulations

What are the regulations that cover reporting of prescriptions?

<u>18 V.S.A. § 4283</u> requires all dispensers that are licensed in Vermont to report all Schedule II-IV controlled substance

prescriptions dispensed to a patient in Vermont. Further specification is covered in the <u>Vermont</u> <u>Prescription Monitoring System Rule</u>.

How often does my pharmacy need to submit dispensation data?

Within 24 hours or one (1) business day.

How do I know if my pharmacy is required to submit prescriptions?

As required by <u>18 V.S.A. § 4283</u>, every dispenser who is licensed by the Vermont Board of Pharmacy is required to report each controlled substance Schedules II – IV dispensed to a patient within Vermont. This includes non-resident mail order pharmacies that mail prescriptions directly to Vermont patients.

Reporting is not required for:

• a drug administered directly to a patient; or

Quick Contacts

For issues regarding your specific pharmacy, please engage your pharmacy reporting vendor(s) or PDMP Compliance department.

For technical support in creating an account, uploading prescriptions or correcting errors:

https://pmpclearinghouse.zend esk.com/hc/en-us

For questions related to licensure or obtaining a license, please contact the Board of Pharmacy: https://sos.vermont.gov/opr/ a drug dispensed by a health care provider at a facility licensed by the Department, provided that the quantity dispensed is limited to an amount adequate to treat the patient for a maximum of 48 hours.

How do I know if my pharmacy is <u>exempt</u> from reporting prescriptions?

In accordance with the <u>Vermont Prescription Monitoring System Rule</u> (Section 4.5 Exemptions from *Reporting to VPMS*), reporting to VPMS is not required for pharmacies that fit certain qualifications. These pharmacies may request an exemption from reporting. The exemption shall terminate when the pharmacy dispenses any controlled substance or no longer meets the criteria for exemption.

These are the specifications for pharmacies that are exempt from reporting:

- does not dispense any II-IV controlled substances.
- does not dispense any II-IV controlled substances to any patients in Vermont.
- administers II-IV controlled substances directly to a patient only.
- dispenses II-IV controlled substances limited to an amount adequate to treat a patient for a maximum of 48 hours only.
- is a veterinarian office or pharmacy dispensing only to animal patients.
- is an opioid treatment program that dispenses only methadone and buprenorphine.
- is a 503B Outsourcing facility not dispensing directly to patients.

How do I sign up for an exemption?

If you fit the above criteria, you may submit a request for exemption here: <u>https://forms.office.com/pages/responsepage.aspx?id=0500IK26PE0cAnDtzHVZxp7zRIIOVDBIkfy</u> 2xhJqieJURFRDTFM5WIJYRENVMEdGSkV0SUM50U5YMS4u&route=shorturl

Each exemption is required to be renewed in the renewal period, which is December 1-31st of each year. The exemption will be in place for the entirety of the following calendar year.

If circumstances change and your pharmacy begins dispensing controlled substances schedule II-IV, the exemption is void and you must begin reporting prescriptions in accordance with the Data Submission Guide.

Do I have to do anything if my pharmacy does not have a DEA number?

If your pharmacy does not have a DEA number, you do not need to register or obtain an exemption from reporting. If you obtain a DEA number, you will be required to register at that time.

Do I have to do anything if my pharmacy has a DEA number and does not dispense controls?

If a pharmacy has a DEA but does not dispense controls, they must register with VPMS and either obtain an exemption or submit zero reports.

Data Submission

What data elements am I supposed to report?

VPMS accepts data in the American Society for Automation of Pharmacies (ASAP) 4.2b standard. The required, requested, and optional fields are listed in Appendix A of the <u>Data Submission Guide</u>, available on the VPMS website.

What if we didn't dispense any prescriptions on a specific day?

If you have no dispensations to report for the day, you must report this information to the VPMS as a "zero report."

Zero reports are not to be used as coverage for not reporting controlled substances dispensed if there are technical issues uploading a prescription file.

They should only be used to designate that legitimately on that day, no prescriptions were dispensed. You may submit your zero report through the PMP Clearinghouse web portal or via SFTP using the ASAP Standard for Zero Reports. For additional details on submitting via SFTP, refer to the <u>Data Submission Guide: Appendix C</u>.

Is zero reporting required on holidays and weekends?

Yes, zero reports are required for any day that the pharmacy is open and where there are no controlled substance prescriptions dispensed, including weekends and holidays.

What happens if we miss a submission deadline?

Late submissions should be corrected as soon as possible. Continuous non-compliance may lead to the Board of Pharmacy or other enforcement actions as described in 18 V.S.A. § 4283.

What are the requirements for correcting errors in the prescription record?

<u>18 V.S.A. § 4283</u> requires all dispensers that are licensed in Vermont to report all Schedule II-IV controlled substance prescriptions. Each pharmacy is responsible for the timeliness and accuracy of data from their location.

All Dispensers must correct identified errors within ten (10) business days.

Troubleshooting

I don't see a prescription, what do I do?

For technical support in correcting errors or find missing prescriptions, log a ticket here: <u>https://pmpclearinghouse.zendesk.com/hc/en-us</u>

What are common error types in submissions, and how can they be resolved?

Common errors include incorrect patient information, prescriber information, and NDC (National Drug Code) errors. Detailed instructions on resolving errors can be found in the <u>Data Submission</u> <u>Guide</u> under *Error Correction*.

How can I verify that a correction has been successfully submitted?

After making a correction, you can confirm submission by checking the status in the PMP Clearinghouse web portal or through SFTP confirmation logs.

What should I do if our pharmacy experiences technical issues?

If you encounter technical difficulties that prevent timely reporting, notify VPMS as soon as possible. You should also document the issue and maintain records of attempts to submit data.

How should I report if we have multiple pharmacy locations?

Each licensed location must report separately unless designated otherwise.