# Validation and Counseling of Prescriptions for Controlled Substances and Opioids

Joseph Cammilleri, Pharm.D., BCACP, CPE



1

## Speaker Bio



Dr. Cammilleri graduated from Palm Beach Atlantic University with a doctorate of pharmacy and completed his training with a postgraduate residency program at Shands hospital in Jacksonville, Florida. He achieved board certification in ambulatory care pharmacy in 2012 and successfully completed the ASHP Foundation pain management and palliative care trainecship program in 2014. Currently, Dr. Cammilleri serves as an ambulatory care clinical pharmacist at UF Health Jacksonville and also holds the position of program director for the PGY2 pain and palliative care residency program. His areas of expertise include pain management and overdose prevention.



2

# **Speaker Disclosures**

I do not have (nor does any immediate family member have) a vested interest in or affiliation with any corporate organization offering financial support or grant monies for this continuing education activity, or any affiliation with an organization whose philosophy could potentially bias my presentation.



## **Learning Objectives**

- Describe how to ensure access to controlled substances for all patients with a valid prescription;
- Use the Prescription Drug Monitoring Program's Database;
- Assess prescriptions for appropriate therapeutic value;
- Detect prescriptions that are not based on a legitimate medical purpose;
- Define the laws and rules related to the prescribing and dispensing of controlled substances;
- Describe proper patient storage and disposal of controlled substances;
- Describe protocols for addressing and resolving problems recognized during the drug utilization review;
- Provide education on section 381.887, F.S., emergency treatment for suspected opioid overdoses and on the State Surgeon General's Statewide Standing Order for Naloxone;
- Counsel patients with opioid prescriptions; and Provide available treatment resources for opioid physical dependence, addiction, misuse, or abuse.



"I promise to devote myself to a lifetime of service to others through the profession of pharmacy. In fulfilling this vow:

- primary concerns.

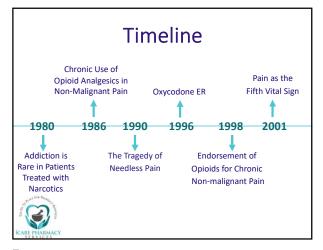
  I will apply my knowledge, experience, and skills to the best of my obility to assure optimal outcomes for my patients.

  I will respect and protect all personal and health information

- I will hold myself and my colleagues to the highest principles of our profession's moral, ethical and legal conduct.
- I will embrace and advocate changes that improve patient care.
   I will utilize my knowledge, skills, experiences, and values to prepare the next generation of pharmacists.
- I take these vows voluntarily with the full realization of the responsibility with which I am entrusted by the public."

5

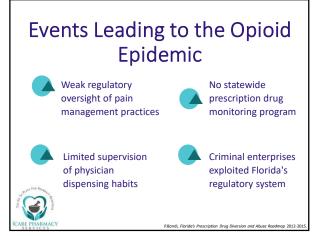
# The Opioid Epidemic 100% Overdose deaths involving select drugs and drug classes in 2022 75% 25%



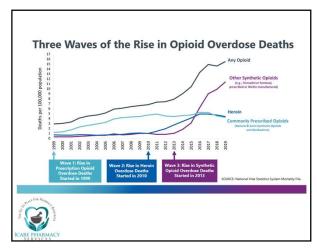
Approximately how many deaths occur daily in the United States due to opioid overdose?

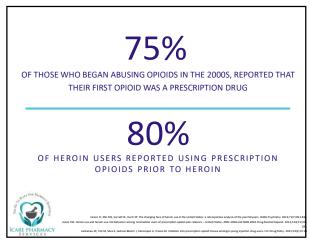
(A) 480
(B) 23
(C) 136
(D) 92

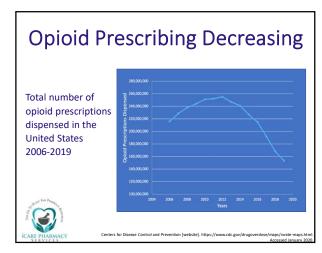
8



q









Public Health and Legislative Initiatives



Prescription Drug Monitoring Program (PDMP) E-Forcse, RxAware®



Board of Pharmacy 64B16-27.81



Guidelines

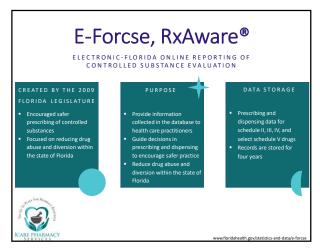


Florida Legislative Changes





13



# E-Forcse, RxAware®

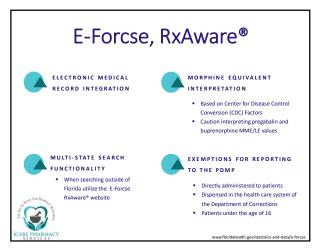
- Must query the PDMP each time a prescription
   Must query the PDMP for new or refilled controlled for a controlled substance is written for a
- All schedule II V controlled substances (except
   Report the telephone number of patient, the

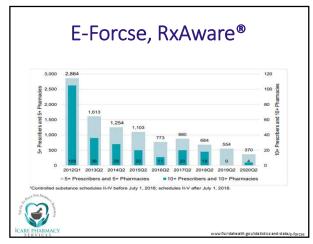
## PRESCRIBERSOR THEIR DELEGATES PHARMACISTS OR THEIR DELEGATES

- substances (all schedule II V controlled substances except non-opioid schedule V)
- individual picking up the controlled substance and identification

## TECHNICAL DIFFICULTIES

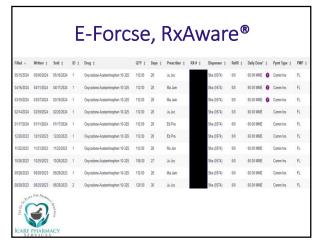
- · Prescriber must document the reason in the medical record and may not prescribe more than a 3-day supply of a controlled substance
- Pharmacist may only dispense a 3-day supply

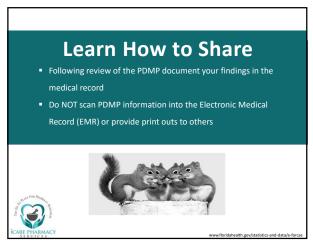












## Pharmacists Caught in the Balancing Act

Decrease Diversion While Maintaining Patient Access

## PHARAMCIST VS PROVIDER

"Can you give me his diagnosis? Do you have MRI scans? When was their physical examination? Have you tried other modalities of care? It's like a whole laundry list of questions they ask you. They're a pharmacist. They're not really trained in making a clinical assessment. ... I think they're really walking outside of the box and stretching out beyond their expertise."



## PHARMACIST VS PATIENT

- Don't have the medicines in stock
- Worried about running out of the medications and leaving their longtime patients empty-handed
- Obeying mandates handed down by
- their employing corporations
- Afraid of being caught in a net cast by the U.S. Drug Enforcement Agency that has shuttered 13 Florida pharmacies since 2011

22

# The 'Pharmacy Crawl'

Opioid Pill Mill Crackdown Forces Patients to Shop Around

"Lesley Young traveled to more than a dozen Jacksonville-area pharmacies before finding one that would fill her husband's prescriptions. You try and dress nice. You go into the drug store and speak well, and they look at you and say what do you need all this medication for and fling (the prescription) back at you, It's humiliating."

"Suzy Carpenter, diagnosed with Stage IV breast cancer, spent three days pleading with pharmacists at 13 drug stores before she received her pain medication"

"Three pharmacies rejected 4-year-old Aiden Lopez's prescriptions for narcotics after the tot underwent surgery for kidney cancer"



23

# Florida's Initiative to Ensure Patient Access

"Decrease roadblocks to patients with a valid prescription and legitimate diagnosis to access the medications they need."

64B16-27.831 Standards of Practice for the Filling of Controlled Substance Prescriptions.2016.



# STANDARDS OF PRACTICE FOR THE FILLING OF CONTROLLED SUBSTANCE PRESCRIPTIONS ELECTRONIC PRESCRIBING ONTINUING EDUCATION FOR PHARMACISTS

25



26

## General Standards for Validating a Prescription

Each prescription may require a different validation process and no singular process can fit each situation that may be presented to the pharmacist. There are circumstances that may cause a pharmacist to question the validity of a prescription for a controlled substance; however, a concern with the validity of a prescription does not mean the prescription shall not be filled

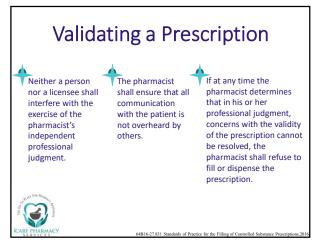
Rather, when a pharmacist is presented with a prescription for a controlled substance, the pharmacist shall attempt to determine the validity of the prescription and shall attempt to resolve any concerns about the validity of the prescription by exercising his or her independent professional judgment.

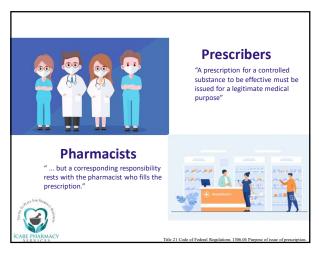


CONCRETE A LA COLOR OF THE COLOR AND A COLOR

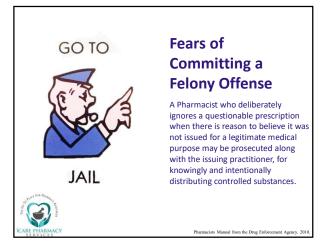
### **Definitions to Consider** VALID PRESCRIPTION VALIDATING A PRESCRIPTION INAVLID PRESCRIPTION Based upon a • If the pharmacist The process implemented by the pharmacist to knows or has reason to know practitionerpatient relationship and when it has been determine that that the the prescription prescription was not issued for a issued for a was issued for a legitimate legitimate legitimate medical purpose medical purpose medical purpose

28

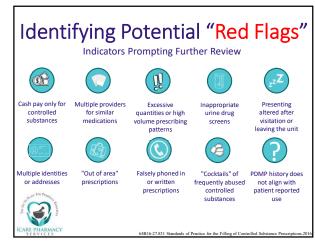




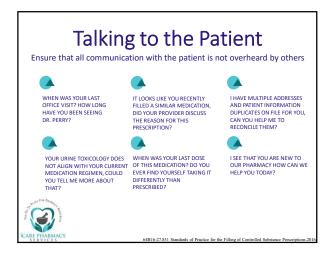
| Validating a Prescription TITLE 21 CODE OF FEDERAL REGULATIONS 1306.04 LEGITIMATE PRESCRIPTIONS |  |  |  |  |
|---|--|--|--|--|
| Based on sound clinical judgment  | Appropriately Documented   |  |  |  |
| Current clinical best practices   | Demonstrate benefit to the patient   |  |  |  |
| CARPHARMACY   | Title 21 Code of Federal Regulations 1306.04 Purpose of issue of prescription. |  |  |  |

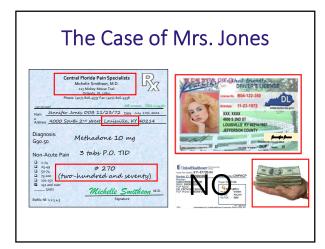


# Prospective Drug Utilization Monitoring A PHARMACIST SHALL REVIEW THE PATIENT RECORD AND EACH NEW AND REFILL PRESCRIPTION PRESENTED FOR DISPENSING IN ORDER TO PROMOTE THERAPEUTIC APPROPRIATENESS BY IDENTIFYING: Over-utilization or under-utilization Therapeutic duplication Drug-disease contraindications Drug-drug interactions Incorrect drug dosage or duration of drug treatment Drug-allergy interactions Clinical abuse/misuse

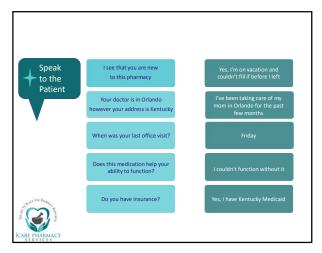


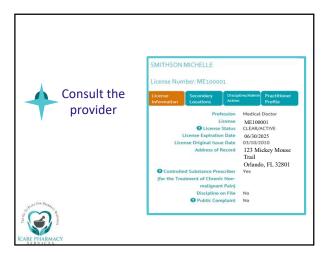






| The Case of Mrs. Jones  Review the PDMP |                   |     |      |            |             |     |
|---|-------------------|-----|------|------------|-------------|-----|
| Filled                                  | Drug              | QTY | Days | Prescriber | Dispenser   | PMP |
| 06/20/2024                              | Methadone<br>10mg | 270 | 30   | Mi Smith   | Walg (0332) | FL  |
| 05/21/2024                              | Methadone<br>10mg | 270 | 30   | Mi Smith   | Walg (0332) | FL  |
| 04/21/2024                              | Methadone<br>10mg | 270 | 30   | Mi Smith   | Walg (0332) | FL  |
| 03/22/2024                              | Methadone<br>10mg | 270 | 30   | Mi Smith   | Walg (0332) | FL  |







41

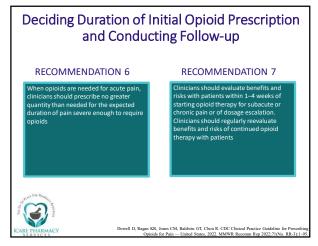
# CDC Clinical Practice Guideline for Prescribing Opioids for Pain

Provides **recommendations** for **all clinicians** who are prescribing opioids for chronic pain outside of active cancer treatment, palliative care, and end-of-life care

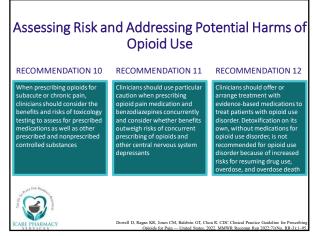


Dowell D, Ragan KR, Jones CM, Baldwin GT, Chou R. CDC Clinical Practice Guideline for Prescribi

|  | 1 |
|--|---|
| Determining Whether or Not to Initiate Opioids for Pain  |   |
| RECOMMENDATION 1 RECOMMENDATION 2  |   |
| Nonopioid therapies are at least as effective as opioids for many common types of acute pain.  Nonopioid therapies are preferred for subacute and chronic pain. Clinicians should maximize use   |   |
| Clinicians should maximize use of of nonpharmacologic and nonopioid nonpharmacologic and nonopioid pharmacologic therapies as appropriate for the specific condition and patient and only consider pioid condition and patient and only consider pioid therapy for acute pain if benefits are anticipated and provided in the properties of the provided provided in the provided pr |   |
| therapy for acute pain if benefits are anticipated to outwelgh risks to the patient Before extrained point discovering prescribing opioid therapy for acute pain, clinicians should discuss with patients the realistic benefits and realistic benefits and known risks of opioid therapy, should work with  |   |
| therapy patients to establish treatment goals for pain and function, and should consider how opioid therapy will be discontinued if benefits do not outweigh risks   |   |
| Dowell D, Ragan KR, Jones CM, Baldwin GT, Cloou R, CDC Clinical Practice Guideline for Preaching<br>Opinids for Pain — United States, 2022 MMWR Recomm Rep 2022;71(No. RR-3):1-95.   |   |
| 43   |   |
|  |   |
|  |   |
|  |   |
| Selecting Opioids and Determining Dosages  |   |
| RECOMMENDATION 3 RECOMMENDATION 4  |   |
| When starting opioid therapy for acute, Subacute, or chronic pain, clinicians patients with acute, subacute, or chronic pain,  |   |
| should prescribe immediate-release opioids instead of extended-release and long-acting (ER/LA) opioids opioids are continued for subacute or chronic pain, clinicians should use caution when  | - |
| prescribing opioids at any dosage, should carefully<br>evaluate individual benefits and risks when<br>considering increasing dosage, and should avoid  |   |
| increasing dosage above levels likely to yield diminishing returns in benefits relative to risks to  |   |
| patients   |   |
| of Carlot  |   |
| EARE PHARMACY   Dowell D, Ragan KR, Jones CM, Baldwin GT, Chou R. CDC Clinical Practice Guideline for Prescribing  |   |
| Opioids for Pain — United States, 2022 MMWR Recomm Rep 2022;71(No. RR-3):1–95.   |   |
|  |   |
|  |   |
|  | 1 |
| Selecting Opioids and Determining Dosages  |   |
|  |   |
| RECOMMENDATION 5  For patients already receiving opioid therapy, clinicians should carefully weigh benefits and  |   |
| risks and exercise care when changing opioid dosage. If benefits outweigh risks of continued<br>opioid therapy, clinicians should work closely with patients to optimize nonopioid therapies<br>while continuing opioid therapy. If benefits do not outweigh risks of continued opioid   |   |
| therapy, clinicians should optimize other therapies and work closely with patients to<br>gradually taper to lower dosages or, if warranted based on the individual circumstances of<br>the patient, appropriately taper and discontinue opioids. Unless there are indications of a   |   |
| life-threatening issue such as warning signs of impending overdose (e.g., confusion, sedation, or suirred speech), opioid therapy should not be discontinued abruptly, and clinicians should not rapidly reduce opioid dosages from higher dosages   |   |
|  |   |
| W.   |   |







## Misapplication of the CDC Guidelines

MISAPPLICATION OF RECOMMENDATIONS TO POPULATIONS OUTSIDE OF THE GUIDELINE'S SCOPE

The Guideline is intended for clinicians treating chronic pain for patients 18 and older. Examples of misapplication include applying the Guideline to patients in active cancer treatment, patients experiencing acute sickle cell crises, or patients experiencing post-surgical pain.

## MISAPPLICATION OF THE GUIDELINE'S DOSAGE RECOMMENDATION THAT RESULTS IN HARD LIMITS OR "CUTTING OFF" OPIOIDS

The Guideline states, "When opioids are started, clinicians should prescribe the lowest effective dosage. Clinicians should... avoid increasing dosage to  $\geq 90$  MME/day or carefully justify a decision to titrate dosage to  $\geq 90$  MME/day." The recommendation statement does not suggest discontinuation of opioids already prescribed at higher dosages.



Dowell D, Ragan KR, Jones CM, Baldwin GT, Chou R. CDC Clinical Practice Guideline for Prescribi Opioids for Pain — United States, 2022. MMWR Recomm Rep 2022;71(No. RR-3):1-

49

## Misapplication of the CDC Guidelines

THE GUIDELINE DOES NOT SUPPORT ABRUPT TAPERING OR SUDDEN DISCONTINUATION OF OPIOIDS

These practices can result in severe opioid withdrawal symptoms including pain and psychological

These practices can result in severe opioid withdrawal symptoms including pain and psychological distress, and some patients might seek other sources of opioids. In addition, policies that mandate hard limits conflict with the Guideline's emphasis on individualized assessment of the benefits and risks of opioids given the specific circumstances and unique needs of each patient.

MISAPPLICATION OF THE GUIDELINE'S DOSAGE RECOMMENDATION TO PATIENTS RECEIVING OR STARTING MEDICATION-ASSISTED TREATMENT FOR OPIOID USE DISORDER

The Guideline's recommendation about dosage applies to use of opioids in the management of chronic pain, not to the use of medication-assisted treatment for opioid use disorder. The Guideline strongly recommends offering medication-assisted treatment for patients with opioid use disorder.



Dowell D, Ragan KR, Jones CM, Baldwin GT, Chou R. CDC Clinical Practice Guideline for Prescrib
Opioids for Pain — United States, 2022. MMWR Recomm Rep 2022;71(No. RR-3):1-

50

## The Case of Mrs. Jones









| _ | 1 |
|---|---|
| 7 |   |
|   | _ |

# Validating a Prescription Mrs. Jones Based on sound clinical judgment Ourmented Current clinical best practices Demonstrate benefit to the patient Title 21 Code of Federal Regulations 1966.04 Purpose of issue of prescription.

52

"The process implemented by the pharmacist to determine that a prescription was issued for a legitimate medical purpose" is known as:

(A) Validating a prescription

(B)Invalid prescribing

(C)Valid prescribing



IVE BEEN PUTTING IN A LOT OF OVERTIME LATEN. TITS BEEN MUNICIPAL TO SEEM MUNICIPAL T

53

## Minimum Standards Before Refusing to Fill

(a) Before a pharmacist can refuse to fill a prescription based solely upon a concern with the validity of the prescription, the pharmacist shall attempt to resolve those concerns and shall attempt to validate the prescription by performing the following:

Initiate communication with the patient or the patient's representative to acquire information relevant to the concern with the validity of the prescription;

Initiate communication with the prescriber or the prescriber's agent to acquire information relevant to the pharmacist's concern with the validity of the prescription.

b) In lieu of either subparagraph 1. or 2., but not both, the pharmacist may elect to access the Prescription Drug Monitoring Program's Database to acquire information relevant to the pharmacist's concern with the validity of the prescription.

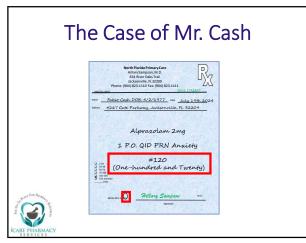
(c) In the event that a pharmacist is unable to comply with paragraph (a) due to a refusal to cooperate with the pharmacist, the minimum standards for refusing to fill a prescription shall not be required.

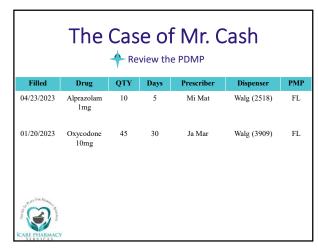


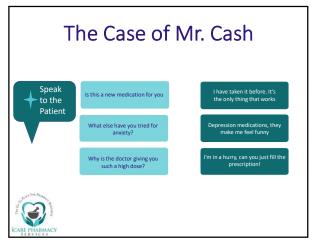
CONCRETE OF THE CONTRACT OF TH

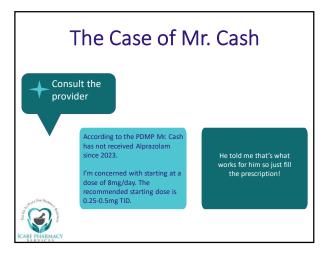
| Refusing to Fill  |  |  |  |
|---|--|--|--|
| "I promise to devote myself to a lifetime of service to others through the profession of pharmacy.  In fulfilling this vow:  I will consider the welfare of humanity and relief of suffering my primary concerns.  I will apply my knowledge, experience, and skills to the best of my ability to assure optimal outcomes for my patients.  I will respect and protect all personal and health information entrusted to me.  I will accept the lifelong obligation to improve my professional knowledge and competence.  I will hold myself and my colleagues to the highest principles of our profession's moral, ethical and legal conduct.  I will embrace and advocate changes that improve patient care.  I will utilize my knowledge, skills, experiences, and values to prepare the next generation of pharmacists.  I take these vows voluntarily with the full realization of the responsibility with which I am entrusted by the public." |  |  |  |

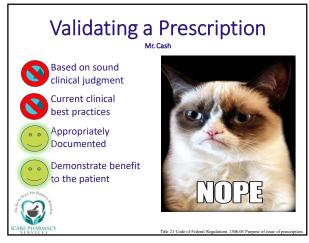






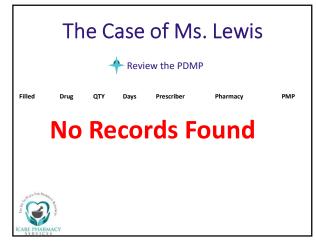


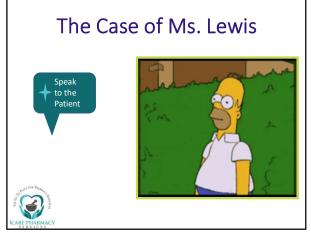


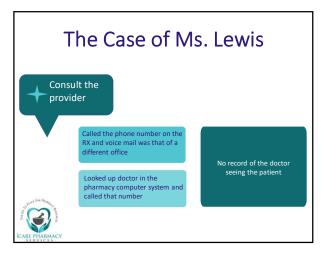


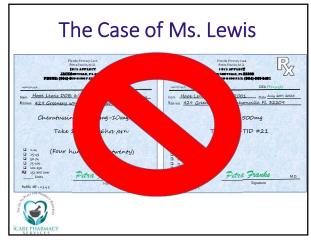












## Florida House Bill 21



Requires pain management clinics to register with the department of health



The department inspect the painmanagement clinic annually, including a review of the patient records, to ensure that it complies with this section and the rules of the Board of Medicine

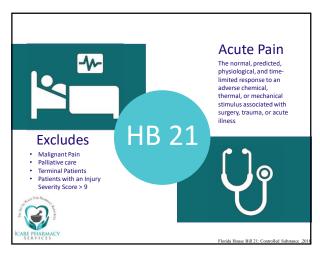


68

## Standards for the Treatment of **Chronic Non-Malignant Pain**

- The complete medical history and a physical examination, including history of drug abuse
- or dependence
  Diagnostic, therapeutic, laboratory results as well as urine drug screen results
- Evaluations, consultations, treatments
  Discussion about treatment objectives and documentation of risks and benefits
- Medications, including date, type, dosage, and quantity prescribed
- Instructions and agreements
  Periodic reviews (every 3 months at minimum)
- A photocopy of the patient's government-issued photo identification If a written prescription for a controlled substance is given to the patient, a duplicate record of the prescription
- The registrant's full name presented in a legible manner
- Board eligible or board-certified anesthesiologist, physiatrist, rheumatologist, or neurologist are excluded





# Opioid Prescribing for Acute Pain



### ACUTE PAIN

Maximum of a 3-day supply of a Schedule II Opioid

## ACUTE PAIN EXCEPTION

The prescriber must document the medical condition and lack of treatment alternatives that justify providing up to a 7-day supply for a Schedule II opioid prescription

"Acute pain exception" must be printed/written on the prescription for a Schedule II opioid

## **CHRONIC PAIN**

"Non-Acute Pain" must be printed/written on the prescription for a Schedule II opioid

TARE PHARMACY

Florida House Bill 21: Controlled Substance .

71

## Florida House Bill 451



## **Non-Opioid Alternatives**

Requires a health care practitioner to discuss non-opioid alternatives and provide the pamphlet to the patient or patient's representative

Exempts health care practitioners providing hospice services and providing care in a hospital critical care unit or emergency department from the requirement to discuss non-opioid alternatives



## Florida House Bill 831



A health care practitioner licensed by law to prescribe a medicinal drug who maintains a system of electronic health records as defined in s. 408.051(2)(a), or who prescribes medicinal drugs as an owner, an employee, or a contractor of a licensed health care facility or practice that maintains such a system and who is prescribing in his or her capacity as such an owner, an employee, or a contractor, may only electronically transmit prescriptions for such drugs.

Exceptions include hospice, research, waivered practitioners, and in situations where electronic prescribing a prescription would be a barrier to the patient obtaining medication



73

# Telehealth and Controlled Substance Prescribing

FL Legislation

• FL SB 312 approved by Gov on 4/6/22

- Anticipated effective date: July 1, 2022
   Narrows restrictions on Rx of controlled substances via telehealth
   Prescribing Schedule II not allowed via telehealth, unless:
   Exception for treatment of psychiatric disorder (ADPI), Anxiety), patients receiving hopolics services, or adients foxed in hopolical or SNF
- Includes: Testosterone, Xanax, Several Anti-Epileptic Drugs
   Does not allow for prescribing or refilling narcotics via Telegraphy



Tan Market

74

## **Get Involved**

Pharmacists working against the Opioid Epidemic





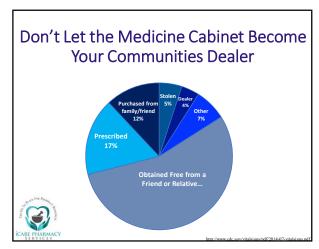


Educate on Safe
Prescribing and Disposal
Practices

Substance Use Disorder Treatment

Prevent Overdose Deaths

| MAL  | S VOR PREREAD |
|------|---------------|
| 100  | 7             |
| = 1  |               |
|      |               |
| CARE | PHARMAC'      |

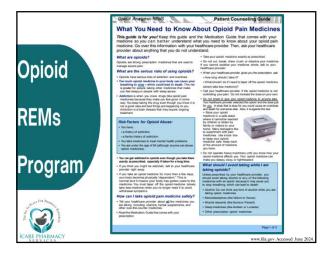


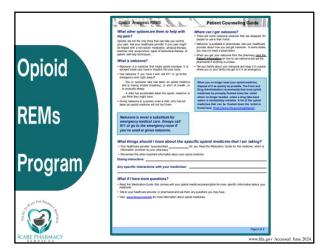




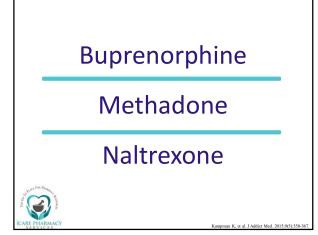
# FDA Flush List Food in Brand Names Ingention Ingention



















Methadone and buprenorphine substitutes one addiction for another



Patients commonly use buprenorphine to get high



Patients on methadone or buprenorphine for opioid use disorder (OUD) should not receive pain medications during hospitalization

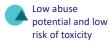


86

## Considerations for OUD **Treatment Selection**



Compliance and good retention rates



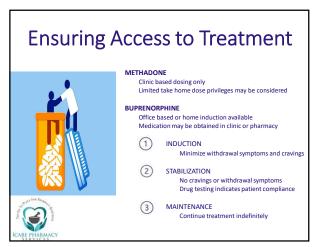


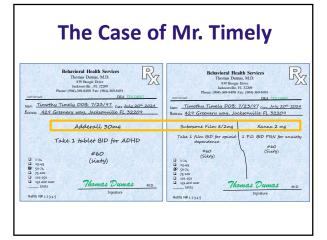
Accessible to the patient



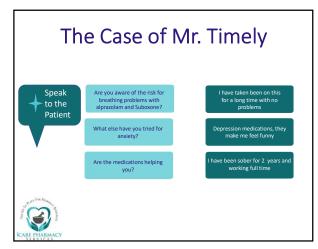


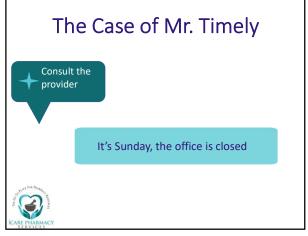


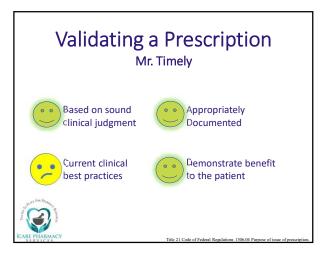


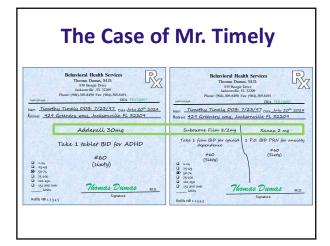


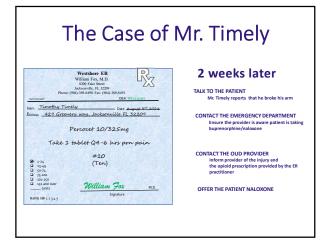
| The Case of Mr. Timely |                              |     |      |            |             |     |
|------------------------|------------------------------|-----|------|------------|-------------|-----|
| Filled                 | Drug                         | QTY | Days | Prescriber | Pharmacy    | PMP |
| 06/20/2024             | Bup/Nal<br>8/2mg             | 60  | 30   | Th Dum     | Walg (0332) | FL  |
| 06/20/2024             | Dex-Amph<br>30mg             | 60  |      | Th Dum     | Walg (0332) | FL  |
| 06/20/2024             | PATIENT HAS BEEN ON THE SAME |     |      |            | FL          |     |
| 05/21/2024             | REGIMEN FOR A YEAR           |     |      |            | FL          |     |
| 05/21/2024             | Dex-Amph<br>30mg             | 60  | 30   | Th Dum     | Walg (0332) | FL  |
| 05/21/2024             | Alprazolam<br>2mg            | 60  | 30   | Th Dum     | Walg (0332) | FL  |



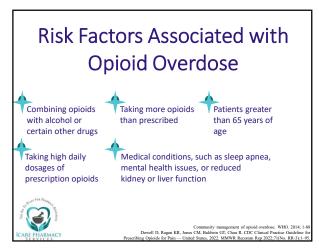


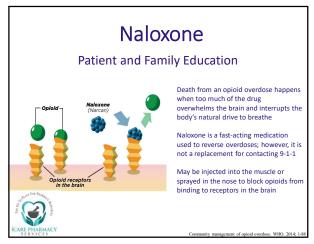






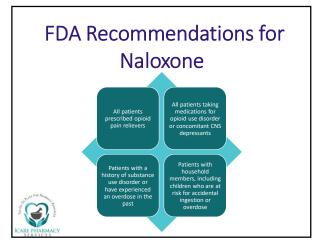


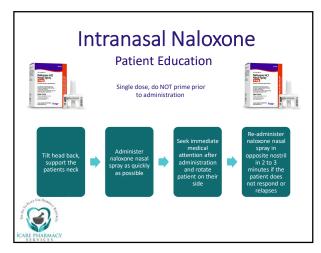












# **Naloxone Dispensing**

Surgeon General's Statewide Standing Order for Naloxone

Authorizes pharmacists who maintain a current active license practicing in a pharmacy located in Florida that maintains a current active pharmacy permit to dispense naloxone to emergency responders for administration to persons exhibiting signs of opioid overdose. Emergency responders include law enforcement officers, firefighters, paramedics and emergency medical technicians



Florida Executive Order 17-146 May 2017

103

## **Naloxone Dispensing**

Senate Bill 544: Drug-related Overdose Prevention

- ☐ Passed 2022
- ☐ Allows pharmacists to order and dispense naloxone to a patient or caregiver without a prescription
- ☐ The law also authorizes law enforcement officers, correctional officers, and child protective investigators to possess, store, and administer naloxone.
- ☐ It permits public schools to purchase and store the medication securely on school promises
- premises.

  ☐ The law requires hospital emergency departments and urgent care clinics to report incidents involving a suspected and actual overdose to the Florida Department of Health when the individual does not arrive via EMS or law enforcement transport.



104

# Naloxone Dispensing

OTC Approved March 29<sup>th</sup> 2023





# **Summary & Resources**



Pharmacists play an essential role as the gatekeepers to appropriate therapy for patients receiving controlled substances



64B16-27.831 outlines the expectations for pharmacists validating controlled substance prescriptions



Federal law resources may be referenced in the DEA Pharmacists Manual



107

## Validation and Counseling of Prescriptions for Controlled Substances and Opioids

Joseph Cammilleri, Pharm.D., BCACP, CPE

