FAQ: Apple Health (Medicaid) Prescription Monitoring Program (PMP) check for outpatient prescriptions

SUPPORT Act | Secton 5042

Beginning October 1ˢᵗ, 2021, the Health Care Authority (HCA) requires providers check the Washington State Prescription Monitoring Program (PMP) prior to prescribing and up to two days after dispensing outpatient prescriptions for controlled substances in compliance with WAC 182-530-1080. This rule is in compliance with section 5042 of the SUPPORT Act.

Frequently asked questions

How do providers and facilities register, access, and use the Prescription Monitoring Program (PMP)?
Information on PMP registration, access, and use may be found on the Washington State Department of Health's Prescription Monitoring Program (PMP) webpage. This webpage includes information on integration for facilities, pharmacies, and electronic health records (EHR) systems.

When is a provider required to check the PMP?
- **Prescribers** are required to check the PMP prior to prescribing any controlled substance. This check must be completed no more than ten days prior to prescribing controlled substance.
- **Dispensing pharmacists** are required to check the PMP no later than two days after dispensing a controlled substance.

May a delegate complete the PMP review?
The prescriber or dispensing pharmacist may delegate the retrieval of the client's PMP information to anyone in their practice setting with authorization to access the PMP. The prescriber or dispensing pharmacist must be the person to review the client's current prescriptions, including any prescriptions not paid for by Apple Health.

How is the PMP retrieval and review documented?
The prescriber and dispensing pharmacist must document in the client's medical record (patient's chart notes, patient's pharmacy profile) the date and time the information was retrieved and the date and time when it was reviewed. If the prescriber and the dispensing pharmacist work together in the same facility , the client's clinical and pharmacy records must document the date and time of the PMP information retrieval and the date and time both the prescriber and the dispensing pharmacist reviewed the PMP information.

Are there exceptions to reviewing the PMP?
Providers or their delegate must make a good faith effort to retrieve and review the PMP information. If after a good faith effort retrieval is not possible, the provider or delegate must document the date and times of the attempt(s) and reason or reasons they were unable to retrieve the information.

Is the PMP review required for all clients?
The PMP review is required for clients enrolled in an Apple Health Managed Care plan or Fee-for-Service (FFS) program. This includes dual-eligible clients (those with Medicare and Medicaid) and clients with third-party-liability (TPL) where Apple Health is the secondary payer.

The PMP review is not required for clients who are receiving hospice or palliative care; or treatment for cancer, a resident of a long-term care facility, or a resident of a facility for which frequently abused drugs are dispensed through a contract with a single pharmacy.

Can this be audited?
Yes. In accordance with Section 5042 of the SUPPORT Act and WAC 182-530-1080, HCA has authority to audit this process to ensure compliance.

(Revised 9/23/2021)

Why is HCA making this change?

On October 24, 2018 President Trump signed the Substance Use-Disorder Prevention that Promotes Opioid Recovery and Treatment ("SUPPORT") for Patients and Communities Act. The SUPPORT Act includes several provisions directed to the Medicaid program.

Section 5041 and 5042 of the Act establish the "Medicaid Providers Are Required to Note Experiences in Record Systems to Help In-need Patients Act" or the "Medicaid PARTNERSHIP Act."

The Medicaid PARTNERSHIP Act requires Medicaid providers to make a "good faith effort" to check a prescription drug monitoring program before prescribing a controlled substance (Schedule II through Schedule IV).

Additional questions

Please email questions to AppleHealthPharmacyPolicy@hca.wa.gov