

Confusion regarding “New Requirements to Utilize the new Online PMP - Effective October 15, 2016” Bruce Black, MD

“MassPAT” is the new Massachusetts Prescription Awareness Tool that replaced the Prescription Monitoring Program (PMP) in August (1).

On Oct 11, most Massachusetts psychiatrists received an email from DPH regarding “New Requirements to Utilize the new Online PMP - Effective October 15, 2016” (2). That email stated that beginning October 15:

- A registered individual practitioner **must utilize MassPAT each time the practitioner issues a prescription to a patient for any Schedules II and III narcotic drug.**
- Prescribers must continue to **check MassPAT the first time they prescribe to a patient a benzodiazepine** or any controlled substance in Scheduled IV or V which the Department has designated in guidance as a drug that is commonly abused and may lead to dependence. At this time, there are no drugs that have received this designation.

The embedded link in the October 11 email for “Schedules II and III” goes to a DEA web page that lists “Dexedrine, Adderall, and Ritalin” among other Schedule II drugs (3). This seems to have led many physicians to conclude that we are required to utilize MassPAT each time we issue a prescription for a stimulant medication. This is not the case.

The source of confusion seems to be in the interpretation of “any Schedules II and III narcotic drug.” Some have interpreted this phrase to imply that “Schedules II and III drug” is synonymous with “narcotic drug”. Although, most physicians tend to think of “narcotics” as applying only to opiate-like drugs, not everyone uses the term the same way (4). In common usage, the term is sometimes used to refer to all soporifics, including drugs like Ambien or benzodiazepines or even ketamine. In legal usage the term is used to refer to all drugs of abuse, including drugs like marijuana, LSD, PCP, and cocaine.

Fortunately, the DEA does classify drugs (5) into one of five schedules, and separately classify drugs as narcotic or not narcotic. Drugs classified as narcotic may fall under any of the five controlled substance schedules. Although stimulant medications are all classified as schedule II drugs, they are NOT designated as narcotic drugs. Therefore, they do NOT fall under the mandate to utilize MassPAT each time we prescribe any Schedule II or III narcotic drug.

Just to be certain of this interpretation, I emailed MassPAT and asked, “Are individual practitioners required to utilize MassPAT when prescribing a stimulant medication (such as methylphenidate, dexedrine, Adderall, amphetamine, dextroamphetamine, lisdexamfetamine)?” They responded as follows, “Stimulants are NOT required to be checked on MassPAT prior to prescribing.” There has also been some confusion regarding whether prescribers must utilize MassPAT when prescribing gabapentin. Although the state legislature has passed legislation directing DPH to designate gabapentin as an additional drug that will require prescribers to utilize MassPAT before prescribing for the first time, DPH has not yet issued regulation on this. Therefore, prescribers are NOT required to utilize MassPAT before prescribing gabapentin. (2 & 6)

For most psychiatrists (excluding psychiatrists in substance abuse treatment settings), we will only be required to check MassPAT the first time we prescribe a benzodiazepine. Those who prescribe Schedule II or III narcotics, including buprenorphine and methadone, will be required to check MassPAT each time you prescribe a narcotic drug.

Although you will not be required to check MassPAT each time you refill a benzodiazepine prescription, or at all when prescribing stimulant medications, MassPAT can be a very useful tool whenever you have any reason to suspect that a patient may be misusing, abusing, or diverting any controlled substance, or may be obtaining prescriptions from more than one provider without making you aware of this. I have found it helpful to routinely check MassPAT each time I am prescribing a stimulant medication for the first time.

References

1. [http://www.massmed.org/Physicians/Practice-Management/Practice-Ownership-and-Operations/Massachusetts-Prescription-Awareness-Tool-\(MassPAT\)/#.WATYOVkrJhE](http://www.massmed.org/Physicians/Practice-Management/Practice-Ownership-and-Operations/Massachusetts-Prescription-Awareness-Tool-(MassPAT)/#.WATYOVkrJhE)
2. <http://www.mass.gov/eohhs/gov/departments/dph/programs/hcq/drug-control/pmp/reporting-and-use.html>. This sight also includes links to information regarding registering for and using MassPAT.
3. <https://www.dea.gov/druginfo/ds.shtml>
4. <https://medlineplus.gov/ency/article/007489.htm>
<https://en.wikipedia.org/wiki/Narcotic>
<http://www.merriam-webster.com/dictionary/narcotic>
<http://www.dictionary.com/browse/narcotic> (Includes television in the definition of narcotic.)
5. <https://www.deadiversion.usdoj.gov/schedules>
https://www.deadiversion.usdoj.gov/schedules/orangebook/cs_alpha.pdf
6. <https://malegislature.gov/Laws/SessionLaws/Acts/2016/Chapter52>

Happy Holidays!!

*The MPS Staff and Council would like
to wish all of you and yours a very safe,
happy and joyous holiday season!*