



Controlled Substances Board



Report 11

2019 Quarter 4 and Year-End Summary

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Introduction

This report is being provided pursuant to ss. 961.385 (5) – (6), Wis. Stats., which requires the Controlled Substances Board (CSB) to submit a quarterly report to the Wisconsin Department of Safety and Professional Services (DSPS) about the Wisconsin Prescription Drug Monitoring Program (WI PDMP). This report is intended to satisfy that requirement for the fourth quarter of 2019 and will primarily focus on analysis of PDMP data from Q4 2019 and the preceding 12 months. For annual analysis of the WI PDMP from 2015 through 2018, see the Q4 2018 report found at <https://dsps.wi.gov/Pages/BoardsCouncils/CSB/Reports.aspx>.

The WI PDMP was first deployed in June 2013. It is administered by DSPS pursuant to the regulations and policies established by the CSB. An enhanced system, the WI ePDMP, was launched in January 2017, allowing the WI PDMP to become a multi-faceted tool in Wisconsin's efforts to address prescription drug abuse, misuse, and diversion through clinical decision support, prescribing practice assessment, communication among disciplines, and public health surveillance. Effective April 1, 2017, prescribers are required to check the WI ePDMP prior to issuing a prescription order for a monitored prescription drug, defined as controlled substance prescription drugs in Schedules II-V.

The WI ePDMP Public Statistics Dashboard (<https://pdmp.wi.gov/statistics>) provides interactive data visualizations for much of the data contained in this report, including county-level data for many of the charts.

User Satisfaction

A WI ePDMP user satisfaction survey was conducted in April 2018, and detailed results of the survey were provided in the Q2 2018 report. The survey indicated that most users are satisfied with the WI ePDMP, with 77% percent of respondents providing responses of either “Satisfied” or “Very Satisfied.”

User-led enhancements identified through the initial survey and refined via a subsequent user survey in January 2019 are being prioritized for the 2019 and 2020 development timeline. These enhancements include:

- Streamlining the Patient Report to expand the use of visualization, reduce the need to scroll through the page, and add detail available in the dispensing detail;
- Improving the error correction/record voiding process used by dispensers to correct or void a previously reported dispensing record.

User-group feedback will continue to be utilized throughout the development process to ensure enhancements meet the needs of the WI ePDMP users. An additional user satisfaction survey will be conducted after implementation of the enhancements.

Impact on Referrals for Investigation

Pursuant to s. 961.385 (2) (f) and (3) (c), Wis. Stats., the CSB may disclose PDMP data to a licensing or regulatory board and refer for discipline a pharmacist, pharmacy, or practitioner who fails to comply with the rules of the Prescription Drug Monitoring Program or if circumstances indicate suspicious or critically dangerous conduct or practices of a pharmacy, pharmacist, practitioner, or patient. In 2018, the CSB Referral Criteria Workgroup was formed to develop recommendations for how the CSB could define suspicious or critically dangerous conduct or practices.

Based on the initial recommendations, the Wisconsin Medical Examining Board (MEB), Dentistry Examining Board (DEB), and Board of Nursing (BON) received summaries of the PDMP dispensing data specific to their professions at their meetings in the fall of 2018. Based on the data presented, the following actions occurred:

- The top seven physician (MD/DO) prescribers and the top seven physician assistant (PA) prescribers, based on opioid dispensing volume, were referred to the MEB.
- The top four dentistry prescribers, based on opioid dispensing volume, were referred to the DEB. An additional 12 dentistry prescribers were referred from the highest 1% of opioid prescribers for the profession for having written prescriptions for over three days without any indication of use of the WI ePDMP.
- The top four Advanced Practice Nurse Prescribers (APNP), based on opioid dispensing volume, were referred to the BON. The BON requested additional targeted outreach to over 800 APNPs who had an estimated WI ePDMP usage of less than 50% in an effort to educate these prescribers about the requirement to use the PDMP, as well as the tools available in the PDMP that can help promote safe prescribing practices.

The investigation of most of the referred prescribers is ongoing, through the DSPS Division of Legal Services and Compliance. Cases related to one of the referred MDs, one of the referred PAs, and two of the referred APNPs were closed after investigation with a finding that no violation had occurred.

The CSB Referral Criteria Workgroup has continued to meet in 2019 to refine the process for using PDMP data to proactively monitor licensees and their prescribing practices for suspicious or critically dangerous conduct or practices and to determine when such activity should result in a referral to the appropriate examining board. Results of the current investigations will also be used by the CSB Referral Criteria Workgroup to guide the process of proactive monitoring and referrals. The Workgroup's review of prescribers from the September 2019 meeting resulted in the referral of three additional physicians for investigation into possibly dangerous prescribing practices.

Additionally, the CSB conducts monthly audits of dispenser requirements with the requirement to submit dispensing data to the WI PDMP. Targeted outreach efforts are made after each audit in an attempt to bring all non-exempt licensed pharmacies into compliance with the requirement to submit and correct dispensing data. Pharmacies that appear to remain out of compliance after multiple

outreach attempts are referred to the Pharmacy Examining Board (PEB). In Q2 2019, 46 pharmacies were referred to the PEB for possible noncompliance. In Q2 and Q3, a total 69 pharmacies were referred to the PEB for possible noncompliance.

Monitored Prescription Drug Dispensing Trend

For 2019, the annual trend of decreased dispensing of monitored prescription drugs, defined as controlled substances in schedules II through V, continues in Wisconsin. Though, from Q3 2019 to Q4 2019 specifically, there was a slight increase of less than one percent in the total number of all monitored prescription drugs dispensed. Further, there has been an approximately 3.5% reduction in Q4 2019 compared to the dispensing levels of Q4 2018. The total number of dispensed monitored drugs in Wisconsin decreased by 4.5% in 2019 from 2018.

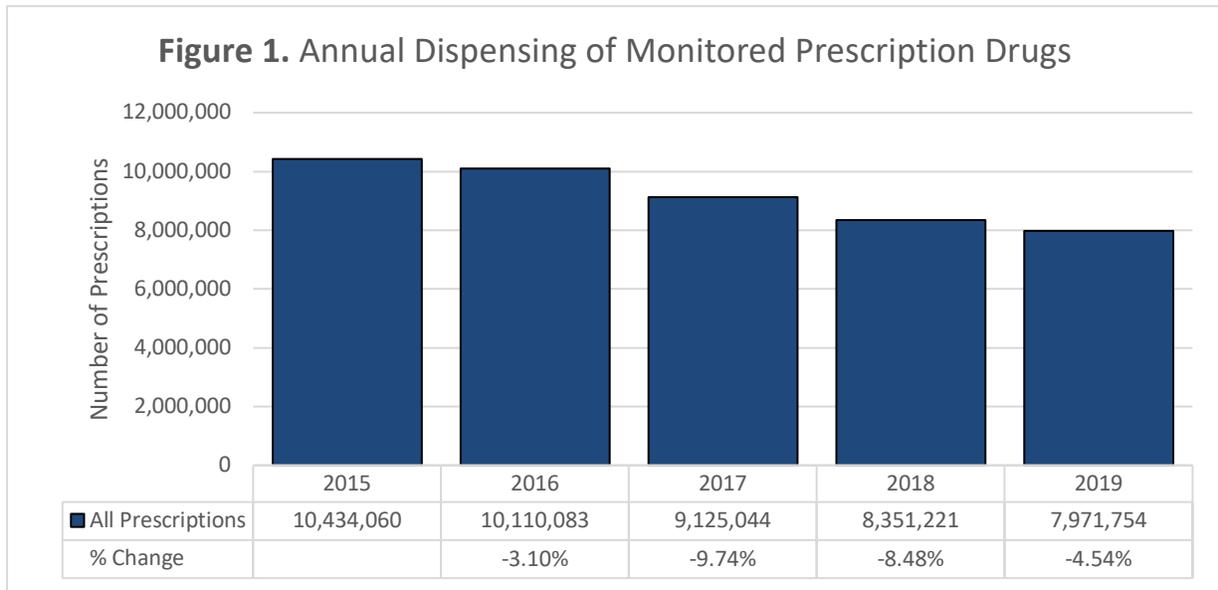
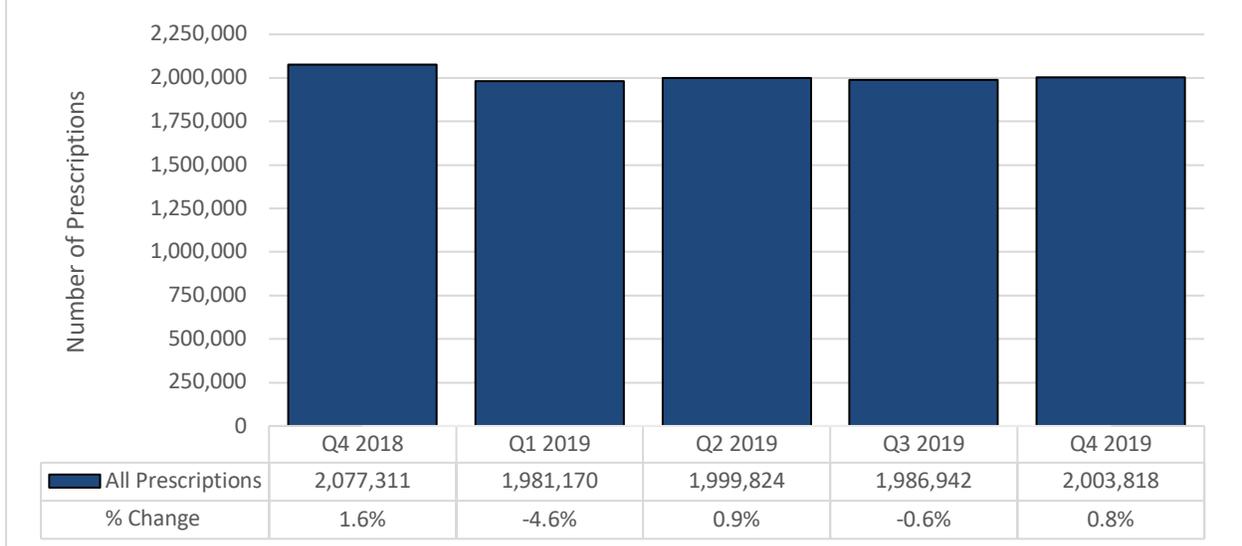
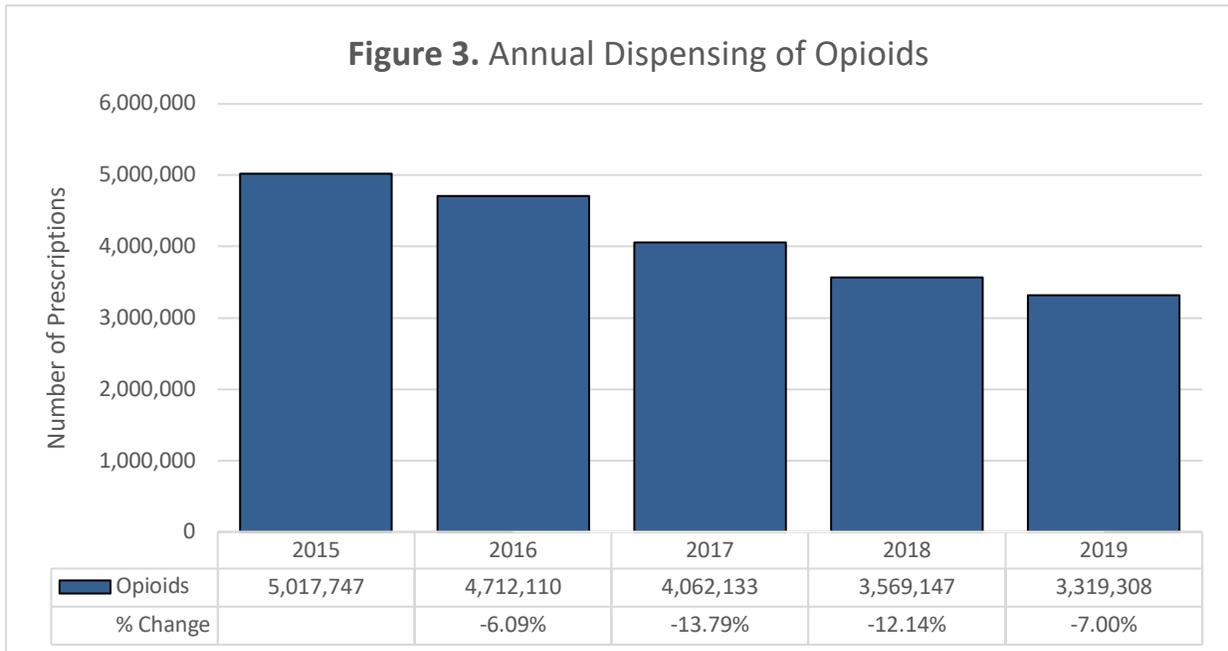


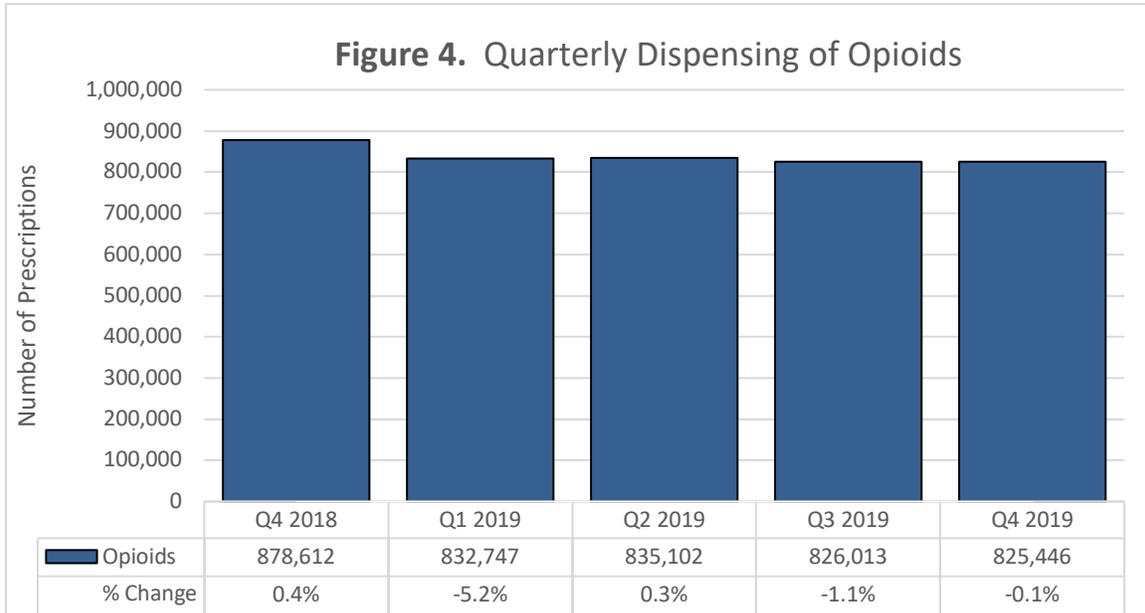
Figure 2. Quarterly Dispensing of Monitored Prescription Drugs



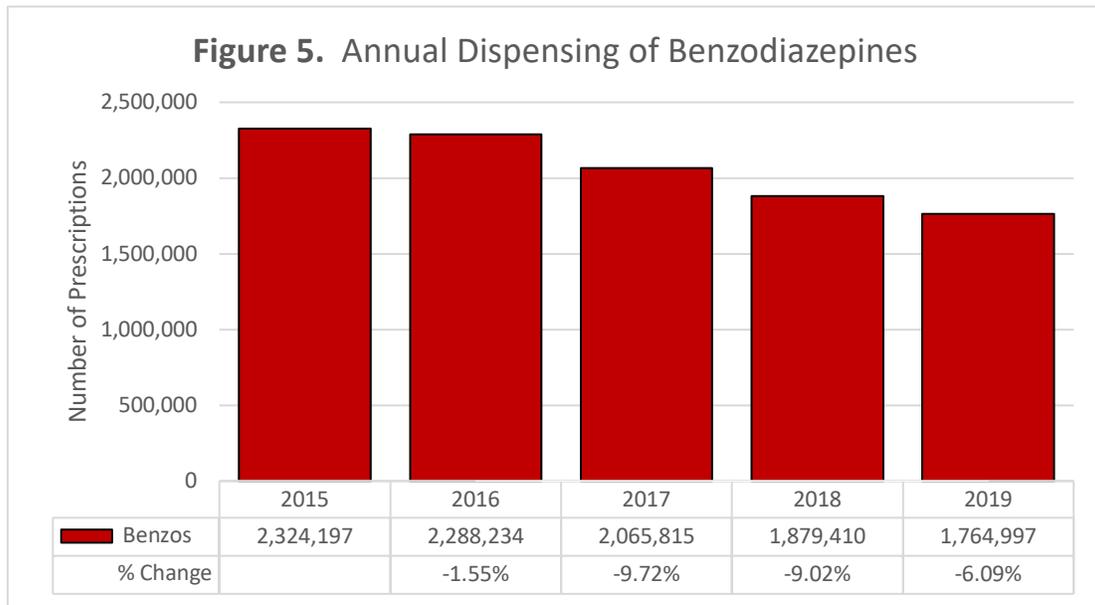
When considering opioids specifically, data from the PDMP show that opioid dispensing from Q3 2019 to Q4 2019 decreased by .08%. Compared to 2018, there was a 7% reduction in opioid dispensing in Wisconsin in 2019.

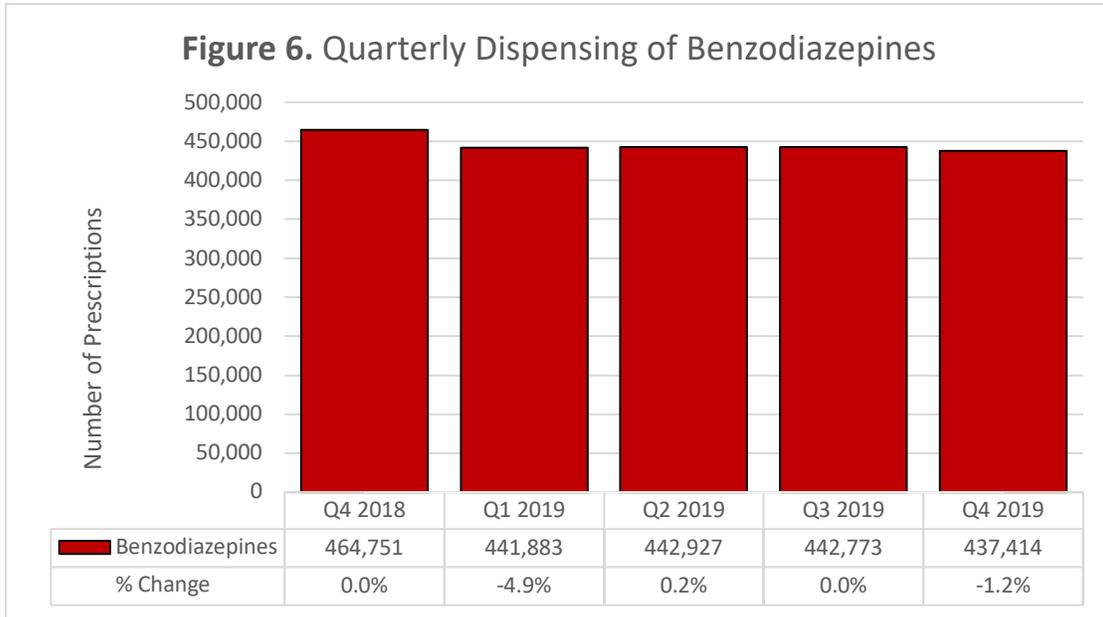
Figure 3. Annual Dispensing of Opioids





Benzodiazepine dispensing from Q3 2019 to Q4 2019 decreased slightly, by just over one percent. This equates to an overall nearly 6% reduction from the dispensing levels of Q4 2018. For the year of 2019, benzodiazepine dispensing decreased by 6% from 2018.





Dispensing of stimulants continues to fluctuate quarterly between increased and decreased dispensing. Dispensing for Q4 2019 increased by 5% from Q3 2019. Overall, dispensing of stimulants is up almost 2.75% from the dispensing levels of Q4 2018. Compared to the full year of 2018, stimulant dispensing increased by over 2% in 2019

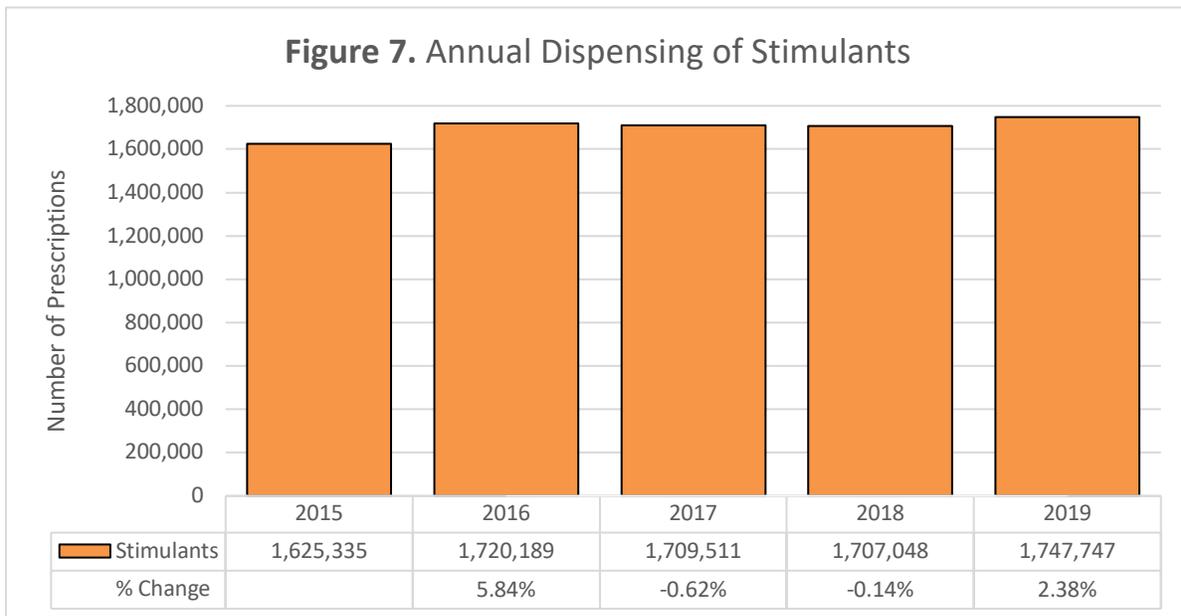
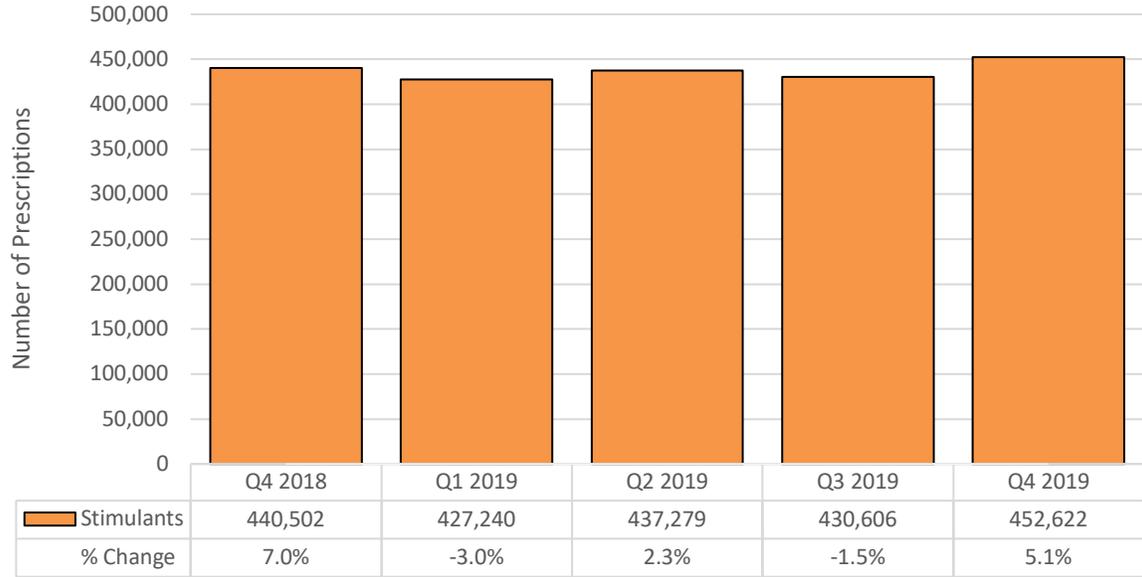


Figure 8. Quarterly Dispensing of Stimulants



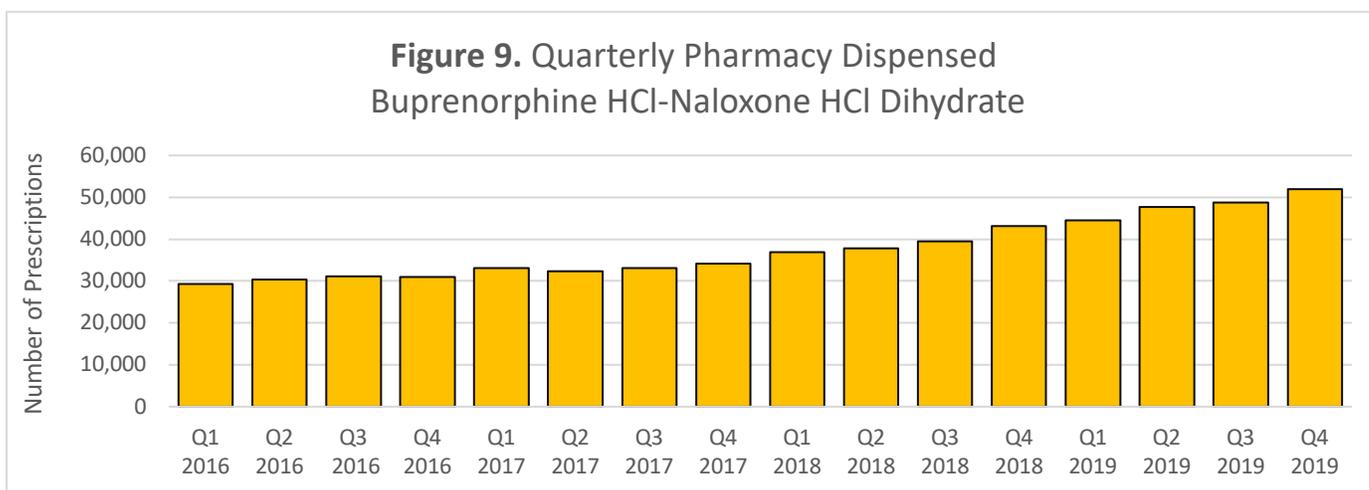
Top 15 Dispensed Monitored Prescription Drugs

Table 1 below shows the top 15 most dispensed monitored prescription drugs in 2019 compared to 2018, ranked in order of the number of prescriptions dispensed in 2019. The top 15 drugs make up nearly 88% of the dispensing of monitored prescription drugs for any given quarter. Table 2 below shows the top 15 most dispensed monitored prescription drugs in Q4 2019 compared to Q3 2019, ranked in order of the number of prescriptions dispensed in Q4 2019. In Q4 2019, Oxycodone HCl dispensing surpassed the number of Alprazolam dispensing to move from 6th to 5th in dispensing. In 2019 as a whole, the drugs that saw the largest decreases in dispensing by percentage were Oxycodone w/ Acetaminophen at nearly 15%, Morphine Sulfate at just over 13%, and Hydrocodone-Acetaminophen at just under 9%. The largest increases were seen by Buprenorphine HCl-Naloxone HCl Dihydrate at nearly 23% and Lisdexamfetamine Dimesylate at 5.5%.

	Drug Name	Drug Class	2018 Dispensings	2019 Dispensings	Percent Change
1	Hydrocodone-Acetaminophen	Opioid	1,194,330	1,087,728	-8.9%
2	Amphetamine-Dextroamphetamine	Stimulant	799,413	808,265	1.1%
3	Tramadol HCl	Opioid	699,819	676,831	-3.3%
4	Lorazepam	Benzodiazepine	588,490	556,002	-5.5%
5	Alprazolam	Benzodiazepine	575,637	534,641	-7.1%
6	Oxycodone HCl	Opioid	564,717	522,645	-7.5%
7	Clonazepam	Benzodiazepine	490,928	464,538	-5.4%
8	Zolpidem Tartrate	Other	472,800	437,075	-7.6%
9	Lisdexamfetamine Dimesylate	Stimulant	373,868	394,296	5.5%
10	Methylphenidate HCl	Stimulant	387,811	390,228	0.6%
11	Oxycodone w/ Acetaminophen	Opioid	390,874	332,782	-14.9%
12	Pregabalin	Other	243,549	240,408	-1.3%
13	Buprenorphine HCl-Naloxone HCl Dihydrate	Opioid	157,322	193,192	22.8%
14	Diazepam	Benzodiazepine	202,397	185,333	-8.4%
15	Morphine Sulfate	Opioid	188,007	162,794	-13.4%

	Drug Name	Drug Class	Q3 2019 Dispensing	Q4 2019 Dispensing	Percent Change
1	Hydrocodone-Acetaminophen	Opioid	270,181	268,631	-0.6%
2	Amphetamine-Dextroamphetamine	Stimulant	202,109	206,636	2.2%
3	Tramadol HCl	Opioid	170,534	168,184	-1.4%
4	Lorazepam	Benzodiazepine	139,718	138,118	-1.1%
5	Oxycodone HCl	Opioid	129,673	132,567	2.2%
6	Alprazolam	Benzodiazepine	133,490	132,010	-1.1%
7	Clonazepam	Benzodiazepine	117,319	115,227	-1.8%
8	Zolpidem Tartrate	Other	110,007	108,065	-1.8%
9	Lisdexamfetamine Dimesylate	Stimulant	96,677	103,133	6.7%
10	Methylphenidate HCl	Stimulant	93,911	101,595	8.2%
11	Oxycodone w/ Acetaminophen	Opioid	81,456	80,786	-0.8%
12	Pregabalin	Other	59,832	62,885	5.1%
13	Buprenorphine HCl-Naloxone HCl Dihydrate	Opioid	48,820	51,940	6.4%
14	Diazepam	Benzodiazepine	46,188	45,610	-1.3%
15	Morphine Sulfate	Opioid	40,598	39,536	-2.6%

One notable trend in the top 15 drugs is that the dispensing of Buprenorphine HCl-Naloxone HCl Dihydrate, one of the medications commonly used as part of Medication-Assisted Treatment (MAT) for opioid use disorder, continues to rise. Note that this does not include dispensing that occur at an opioid treatment program due to federal regulation 42 CFR Part 2, which prohibits federally funded opioid treatment programs from submitting dispensing data to state PDMPs. Buprenorphine HCl-Naloxone HCl Dihydrate moved into the top 15 dispensed monitored prescription drugs in Q3 2018 and was the 13th most dispensed monitored prescription drug in Q4 2019, with an increase of over 6% from Q3 2019 to Q4 2019. This equates to an increase of almost 20.4% in the past 12 months.



Data-Driven Alerts

The WI ePDMP application performs sophisticated data analytics on a patient's prescription history to assess the patient's monitored prescription drug history and to alert WI ePDMP users to potential indications of abuse or diversion, such as early refills and multiple prescribers or dispensers, or factors that increase overdose risk, such as high morphine milligram equivalent doses and overlapping benzodiazepine and opioid prescriptions. Data-driven alerts are presented on the patient report as a way to call attention to specific detail from the dispensing data.

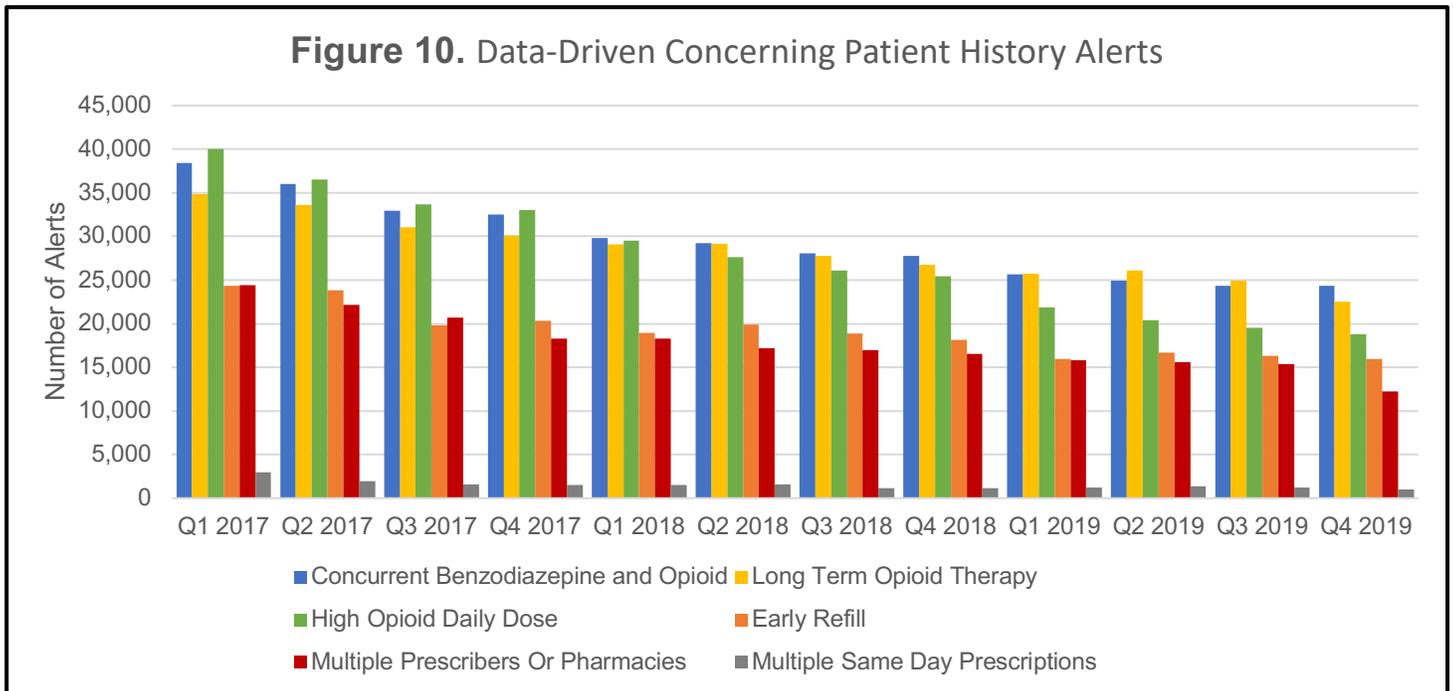
The 6 types of data-driven concerning patient history alerts are:

1. **Concurrent Benzodiazepine and Opioid Prescription Alert**, which indicates when a patient's active current prescriptions include both an opioid and a benzodiazepine, a combination that significantly increases the patient's risk of overdose.
2. **Long-Term Opioid Therapy with Multiple Prescribers Alert**, which indicates when a patient has been prescribed at least one opioid prescription from two or more prescribers for 90 or more days.
3. **High Current Daily Dose of Opioids Alert**, which indicates when a patient's active current prescriptions are estimated to provide a daily dose of opioids that exceeds 90 morphine milligram equivalents (MME), thereby increasing the patient's risk of overdose.
4. **Early Refill Alert**, which indicates when a patient has refilled a controlled substance prescription two or more days earlier than the expected refill date based on the estimated duration of the prescription calculated and reported by the pharmacy.
5. **Multiple Prescribers or Pharmacies Alert**, which indicates that the patient has obtained prescriptions from at least five prescribers or five pharmacies within the previous 90 days. The five prescribers or dispensers may be associated with the same clinic, practice or location, but the WI ePDMP still views them as separate prescribers/dispensers. This alert is not a direct indication of doctor shopping; it is simply a flag for further inspection of the dispensing history.
6. **Multiple Same Day Prescriptions Alert**, which indicates when a patient has received the same controlled substance drug from multiple prescribers or pharmacies on the same day.

Overall, the number of concerning patient history alerts generated by analytics of the dispensing data has continued to decrease, with a 1.4% reduction from Q3 2019 to Q4 2019. The most frequently occurring alert, Overlapping Benzodiazepine and Opioid prescriptions, decreased in occurrence by less than one percent from Q3 2019 to Q4 2019. The number of occurrences in Q4 2019 was 13% lower than the same quarter in 2018 and 37% lower than the first quarter the alerts were made available to WI ePDMP users in Q1 2017. The rate of occurrence of the Multiple Prescribers or Pharmacies alert decreased 20% from Q3 to Q4 in 2019. The number of occurrences in Q4 2019 was 26% lower than the same quarter in 2018 and 50% lower than the first quarter the alerts were made available to WI ePDMP users in Q1 2017.

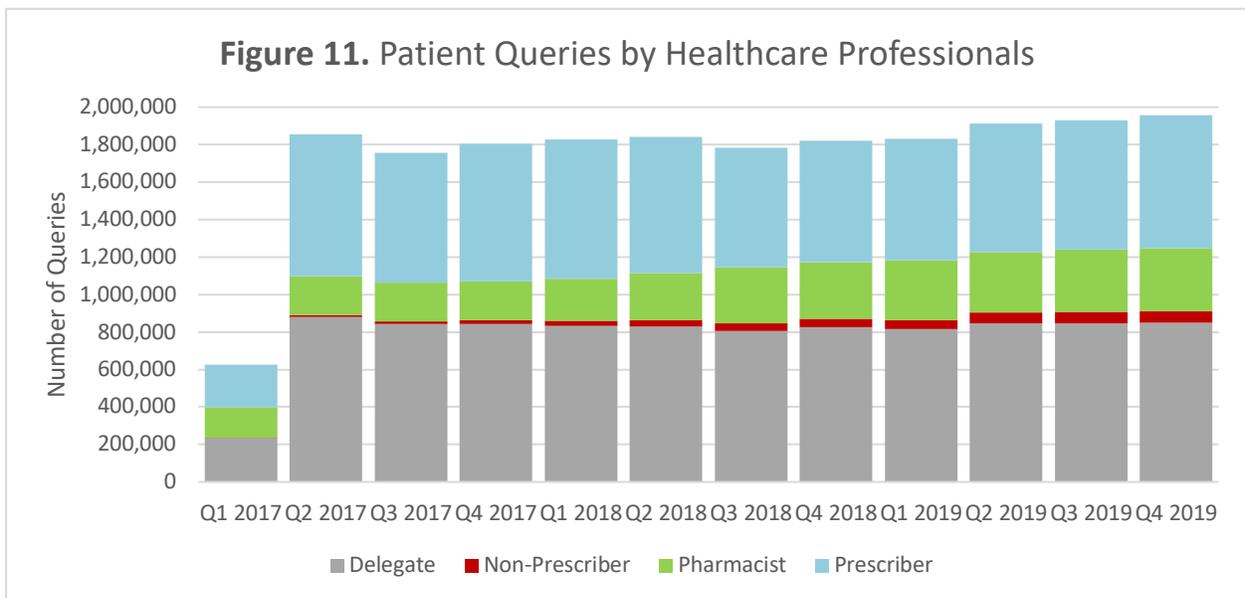
See Table 3 and Figure 10 below for detail on the overall volume of alerts by alert type since the WI ePDMP was launched in Q1 2017, as well as the percent change that occurred from Q3 2019 to Q4 2019. Values for preceding quarters may be modified after the conclusion of a quarter, based on the duration of prescriptions that bridge quarters, which is why it is important to view the number of occurrences for Q4 2019 not only in relation to the preceding quarter, but also in relation to the same quarter of the previous year, as well as a part of the overall trend compared to the first quarters during which the alerts were presented to WI ePDMP users.

	Alert Type	Q3 2019	Q4 2019	Percent Change
1	Concurrent Benzodiazepine and Opioid	24,335	24,306	-0.1%
2	Long-Term Opioid Therapy	24,938	22,517	-9.7%
3	High Opioid Daily Dose	19,539	18,778	-3.9%
4	Early Refill	16,719	16,306	-2.5%
5	Multiple Prescribers or Pharmacies	15,341	12,227	-20.3%
6	Multiple Same Day Prescriptions	1,215	1,025	-15.6%
	All Alert Types	105,867	104,373	-1.4%



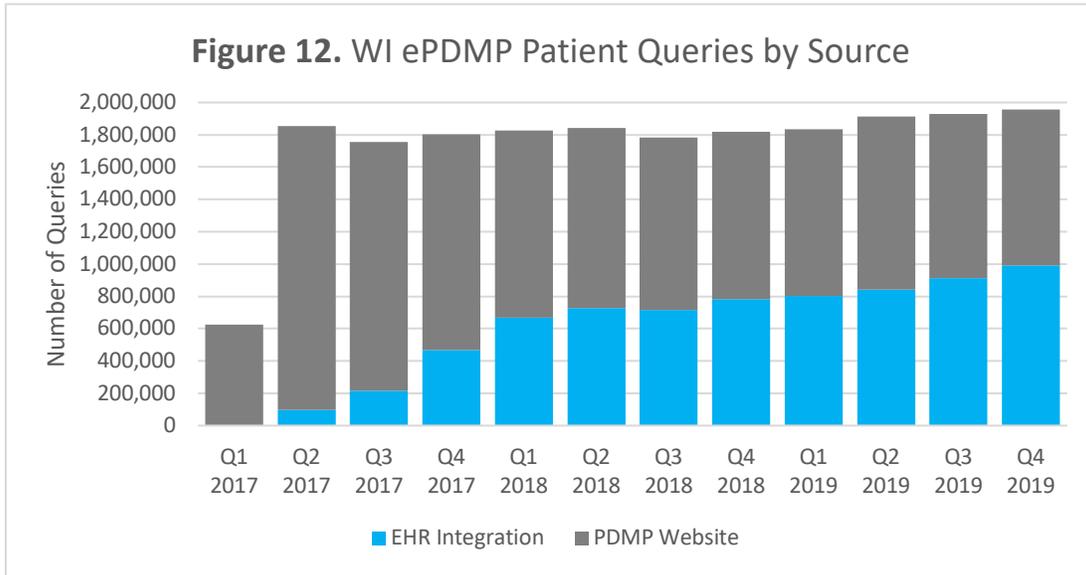
Disclosure of WI PDMP Data

In 2019, healthcare users made over 7.63 million patient queries in the WI ePDMP, which is an increase of nearly 5% compared to 2018. Between October 1 and December 31, 2019, healthcare users made a total of 1,956,095 patient queries. Breaking down the queries by user type shows that 43.4% of the queries were performed by delegates of prescribers or pharmacists, 36% were performed by prescribers, 17% by pharmacists, and 3% by other non-prescribing healthcare professionals. The number of patient queries per month is continuing to increase, even with the overall decreases seen in the dispensing of monitored prescription drugs. Query volume increased by about 1% in Q4 2019 compared to Q3 2019, even though dispensing volume only increased slightly.

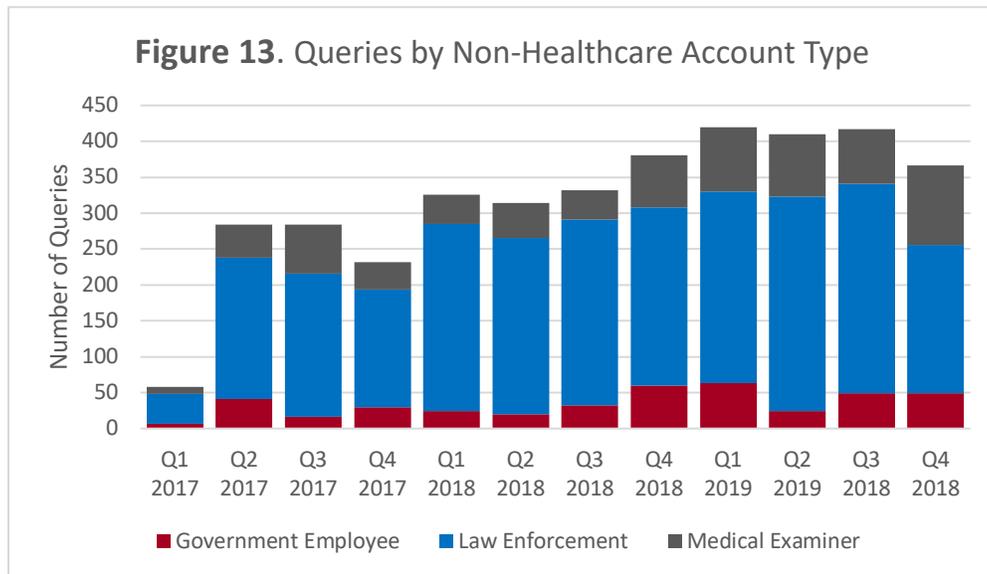


The WI ePDMP is currently connected to 23 other state PDMPs via the National Association of Boards of Pharmacy’s PMP InterConnect (PMPi) and the RxCheck interstate data sharing hub. This allows healthcare users to expand the WI ePDMP patient query to return results from PDMPs in other states, including Wisconsin’s border states of Minnesota, Michigan, Illinois, Iowa and Indiana.

Healthcare professionals from 18 health systems in Wisconsin have one-click access to the PDMP from within their electronic health record (EHR) platform in order to facilitate patient queries within a provider’s busy workflow. Figure 12 below shows that, in Q4 2019, over 50% of patient queries were through the direct EHR integration, which is up from 47% in Q3 2019. Notably, this is the first quarter where more queries were performed through EHR integration than through the PDMP website.



Authorized individuals from non-healthcare groups made a total of 366 requests for PDMP data in Q4 2019, which is a 12% decrease over the previous quarter. Authorized law enforcement queries made up 56% of the non-healthcare queries in Q4 2019

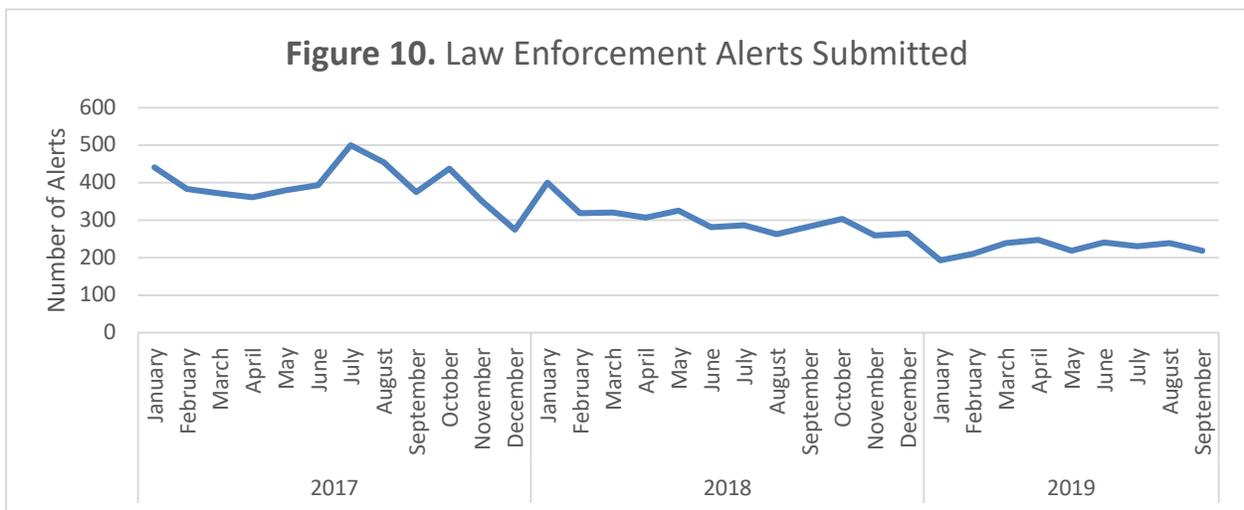


Law Enforcement Reports

During 2019 there were 2,751 events reported to the WI ePDMP by Wisconsin law enforcement agencies. In Q4 2019 there were 654 events reported to the WI ePDMP by Wisconsin law enforcement agencies as required by s. 961.37 (3) (a), Wis. Stat. The law requires the agencies to submit a report in each of the following situations:

1. When a law enforcement officer receives a report of a stolen controlled substance prescription.
2. When a law enforcement officer reasonably suspects that a violation of the Controlled Substances Act involving a prescribed drug is occurring or has occurred.
3. When a law enforcement officer believes someone is undergoing or has immediately prior experienced an opioid-related drug overdose.
4. When a law enforcement officer believes someone died as a result of using a narcotic drug.

Prescribers of patients associated with these events receive a proactive email notice from the WI ePDMP, in addition to the event being captured as an alert on the patient report in the WI ePDMP. Figure 10 shows the number of law enforcement reports submitted to the WI ePDMP by month since the WI ePDMP was launched. There is no statutory requirement for law enforcement agencies to submit their reports within a certain timeframe after the date of the event, and outreach efforts continue to emphasize the value that law enforcement reporting brings for healthcare clinical decision making.



The distribution of submission by report type remains fairly consistent from one quarter to the next. For the year of 2019, the distribution by report type can be seen below:

- 40% of the reports submitted were reports of stolen controlled substance prescriptions
- 20% of the reports submitted were for suspected violations of the Controlled Substances Act
- 35% of the reports submitted were for suspected non-fatal opioid-related overdose events
- 5% of the reports submitted were for suspected narcotic-related deaths.

Summary

Year-end data from the WI ePDMP in 2019 confirm a continued decline in the number of monitored prescription drugs being dispensed in Wisconsin over the past four years. These notable decreases coincided with the timing of some of the State's most concerted efforts to address the opioid epidemic, including the controlled substance prescribing guidelines, requirements for prescribers to have additional education on opioid prescribing, mandatory use of the WI PDMP, and continued enhancements to the WI PDMP system.

Controlled substance prescription dispensing in 2019 compared to 2015 show the following trends:

- 34% decrease in the number of opioid prescriptions dispensed
- 24% decrease in the number of benzodiazepine prescriptions dispensed
- 7.5% increase in the number of stimulant prescriptions dispensed

The number of patient queries performed per month has remained consistent, and is even increasing, even though the overall quantity of monitored prescription drugs being dispensed is decreasing. This indicates that the WI ePDMP continues to be a valuable tool to support safe prescribing, treatment, and dispensing decisions.

Data show overall decreased dispensing for Q4 2019 compared to Q4 2018:

- There was a slight increase in the total number of all monitored prescription drugs dispensed in Q4 2019 from the previous quarter and a total decrease of nearly 3.5% when compared to the same quarter from the previous year.
 - The number of opioid prescriptions dispensed decreased by 7% in 2019 compared to 2018
 - The number of benzodiazepine prescriptions dispensed decreased by 1.2% in 2019 from 2018.
 - The dispensing of stimulants prescriptions dispensed increased by 5.1% in 2019 compared to the previous year.

Overall dispensing rates of monitored prescription drugs remain significantly lower in Q4 2019 than they were at their peak in Q4 2015:

- In Q4 2019, there were 25% fewer monitored prescription drugs dispensed, or just under 700,000 fewer prescriptions, than in Q4 2015.
 - The number of opioid prescriptions dispensed in Q4 2019 was 36%, or over 450,000 prescriptions, lower than the peak number in Q4 2015.
 - The number of benzodiazepine prescriptions dispensed in Q4 2019 was 26%, or nearly 160,000 prescriptions, lower than the peak level in Q4 2015.

Encouraging trends found in the WI PDMP continued in Q4 2019:

- The dispensing of Buprenorphine HCl-Naloxone HCl Dihydrate (Suboxone®), one of the medications commonly used as part of Medication-Assisted Treatment (MAT) for opioid use disorder, increased by 6% in Q4 2019 compared to Q3 2019, which equates to an increase of 20% in the past 12 months and over 77% since Q1 2016.
- The occurrence of data-driven concerning patient history alerts, including measures that indicate drug seeking behaviors and increased risk for overdose, declined by 1.4% from the previous quarter, 18% over the past 12 months, and 42% from the launch of the WI ePDMP in Q1 2017.

Additional detail about the WI ePDMP data, including county-level detail for many of the charts, can be found on the WI ePDMP Public Statistics Dashboard (<https://pdmp.wi.gov/statistics>), under the corresponding tabs of Controlled Substance Dispensing, PDMP Utilization, and Law Enforcement Alerts.