

# URGENT ALERT: ALL DENTISTS

## Prescription Monitoring Program Registry Coming August 27, 2013

The New York State Department of Health has begun implementation of the Prescription Monitoring Program Registry (the Registry) in New York – a system designed to curb abuse of prescription controlled drugs. Below are the key facts you must know if you intend to either **prescribe** a Schedule II, III, or IV controlled substance or if you intend to **dispense** any controlled substance in **any** Schedule in **any** quantity.

1. The Prescription Monitoring Program Registry is one part of the I-STOP (Internet System for Tracking Over-Prescribing) law. The Registry is scheduled by the I-STOP law to take effect on **August 27, 2013**. Although no regulations have yet been promulgated concerning the Registry, the New York State Department of Health is already taking steps to implement the law as written. If you want to prescribe a Schedule II, II, or IV drug or you want to dispense any controlled drug in any Schedule, you must be able to access the Registry.
2. There is a required duty under the I-STOP law to **consult** the Registry **before** prescribing any Schedule II, III, or IV drug to a patient. The Registry will contain a minimum of a six month patient controlled substance history and a maximum of a five year history that the prescriber can review. The I-STOP law does allow for a health care professional to designate a person to access and consult the Registry on his or her behalf – but the health care professional always remains legally responsible for the result and conduct of that process by the designee.
3. While input to the Registry will be by pharmacists in real time from **all** the controlled substance prescriptions they fill from any Schedule, there is also a duty for any health care provider who actually dispenses any controlled substance on any Schedule to a patient, in any quantity, to input that drug dispensing information into the Registry. **Key** – prescriptions are input to the Registry only by pharmacists, but all health care professionals who directly dispense controlled drugs to patients must input that information on their own.
4. The New York State Department of Health is sending out notices to advise people that access to the Registry is going to be accomplished through the Health Commerce System (HCS) online account that they already use for renewing and issuing official New York State prescription forms. While many dentists now opt to do those renewals via paper, the **only** way the Department of Health plans to allow access to the Registry is via the HCS online account system.
5. If you cannot access the Registry because you just didn't bother to sign up for it – you will **lose the ability** to validly prescribe Schedule II, III, or IV controlled substances and the ability to dispense any controlled substance directly to a patient. Your license to practice will also be at risk from the Office of Professional Discipline (OPD) if you attempt to evade or violate the Registry system.

These are the key points you need to know at this time. For further information on the HCS online account system, go to the following Web site:<https://hcsteamwork1.health.state.ny.us/pub/top.html>

or call the HCS account system at either: 866-529-1890, option 1; or 866-811-7957, option 1. They can also answer your questions about the Registry as it progresses toward the August 27, 2013, go-live date.

**DO NOT SIT BY PASSIVELY ON THIS ISSUE: ACT NOW TO ENSURE YOUR ABILITY TO ACCESS THE REGISTRY!**