



Testimony of Carrie Rand-Anastasiades
General Law Committee
In Favor of
SB 194 AAC Electronic Prescription Drug Monitoring Program
Reporting

Good Afternoon Senator Leone, Representative Baram and members of the General Law Committee. My name is Carrie Rand-Anastasiades and I am the Executive Director of the Connecticut Association of Community Pharmacies. We represent chain pharmacies around the State such as Walgreens, Rite-Aid, Stop & Shop, and PriceChopper to name a few. I am here today to testify in favor of SB 194 AAC Electronic Prescription Drug Monitoring Program Reporting.

Pharmacies have been using the PMP for years. Initially we sent biweekly submissions to the Department of Consumer Protection, then it moved to weekly, which we have never objected to. We believe that the PMP is a wonderful tool to monitor and deal with addicts and those that game the medical and pharmacy systems. We were extremely supportive of the Governor's and legislature's initiatives to combat opioid abuse, we do however ask that one change be made in the law that was passed last year.

We would like the time in which we report to be changed from **within 24 hours to daily**. This is due to the fact that PMP reporting systems for many chain pharmacies are automated from the corporate headquarters, rather than directly from the individual pharmacies. This poses a challenge for 24 hour pharmacies. The data processed at each store must be uploaded to the corporate servers before it can then be processed for the purposes of generating a PMP file, and then downloaded to the Department of Consumer Protection. Data for Day 1 is not uploaded until after midnight. It takes several hours to upload the data for the entire chain to the central servers. This means in many cases, the earliest time file would be ready to be reported would be 8 am on Day 2. If a prescription is sold at 2 am on Day 1, it won't be able to be reported until 8 am on Day 2. This would exceed the 24 hour limit. In addition, some independent pharmacies do not have access to automated reporting systems. This means that in many cases, the pharmacist must manually generate the PMP file on Day 2 for prescriptions dispensed on Day 1. If Day 2 is Christmas Day, the pharmacist would have to come into the pharmacy on Christmas Day and manually generate a file in order to be in compliance. If Day 2 is Sunday, and the pharmacy is normally closed on Sundays, the pharmacist would still have to come in on Sunday to manually generate a file in order to be in compliance.

Massachusetts currently has a business day definition. We do not think this request will significantly impact the availability of data in the PMP, and will create a pathway for pharmacies to be in compliance when reporting.

What else should you know? Five states allow for reporting within 3 days: Maryland, North Carolina, Oregon, Pennsylvania and Rhode Island. Nineteen states require daily reporting: Alabama, Arizona, Colorado, Delaware, Idaho, Illinois, Kentucky, Louisiana, Maine, Massachusetts, Michigan, Mississippi, Nevada, New Jersey, New Mexico, North Dakota, Ohio, South Carolina, Tennessee, Wyoming. As you can see daily reporting is widely used. When doctors and pharmacists check the PMP they are looking for a pattern of doctor or pharmacy shopping. We feel that daily reporting can still provide essential data to physicians and the State, but can also work with our security systems. The safety and security of the confidential data that we are remitting is essential to us. We feel that our systems safeguard that information in the best way we know how. It is for these reasons we ask you to change the reporting requirement to daily. Thank you for your consideration.