

State of Vermont

Department of Vermont Health Access

NOB 1 South, 280 State Drive

Waterbury, VT 05671-1010

Agency of Human Services

[Phone] 802-879-5900

[Fax] 802-241-0268

March 01, 2024

Important Reminder Regulations and Best Practices for Pharmacists Dispensing Controlled Substances During the Network Service Outage

Background

On Wednesday February 21st Change Healthcare, the Pharmacy Benefits Manager for Vermont Medicaid which operates point of sale claims processing, including drug utilization review pre- and post-edits, reported issues related to a cyber security incident. Change Healthcare took immediate action to disconnect Change Healthcare's systems to prevent further impact.

During this time, we want to remind pharmacists to adhere to state and federal regulations related to prescriptions for controlled substances. In accordance with the Substance Use Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities Act, (the SUPPORT Act), The department of Vermont Health Access has implemented required standards for the appropriate use of opioids in treating pain.

Prescription Limitations: For initial short-acting opioid prescriptions. Patients 18 years and older are limited to 50 MME per day and a maximum of 7 days' supply. Patients 17 years of age and younger are limited to 24 MME per day and a maximum of 3 days' supply.

Safety: Prior to the outage DVHA required completion of the opioid safety checklist as part of the prior authorization process for members new to opioid therapy with a daily MME > 90 per day. Members with existing claims history in the past 90 days for opioids will require a safety checklist if the daily MME > 120 per day.

While there is currently no authorization approval mechanism in place due to the outage, the check list is still available and can be found through this link: [Opioid Safety Checklist](#). Prescribers are encouraged to use it when for patients with a cumulative daily MME > **90 per day, or > 120 MME per day for existing patients**. DVHA recognizes that pharmacists are in a difficult position with the loss of the prior authorization process and other edits, and they are also encouraged to review the safety checklist to help with their own clinical review prior to filling the prescriptions.

Vermont Prescription Drug Monitoring Program (VPMS): Pursuant to 18 V.S.A. § 4289, the Vermont Department of Health implemented a [Vermont Prescription Monitoring System Rule](#). Pharmacists are required to querying the VPMS in the following circumstances:

- Prior to dispensing a prescription for a schedule II, III, or IV opioid controlled substance to a patient who is new to the pharmacy
- When an individual pays cash for a prescription for a schedule II, III, or IV opioid controlled substance and the individual has prescription drug coverage on file
- When a patient requests a refill of a prescription for a schedule II, III, or IV opioid controlled

substance substantially in advance of when a refill would ordinarily be due.

- When the dispenser is aware that the patient is being prescribed schedule II, III, or IV opioid controlled substances by more than one prescriber.

Best Practices for Pharmacists:

As always please use clinical and professional judgment when filling all prescriptions, controlled substances require extra diligence.

- Follow Vermont Prescription Limitations
 - Check VPMS
 - Verify high doses or dose change with prescribers.
 - Document all pertinent information on the prescription.
- Use the safety checklist as applicable.

Thank you, for your patience, and continued effort during this process. Please contact the Change Healthcare Pharmacy Help Desk at 1-844-679-5362 or the Optum Pharmacy Help Desk at 1-800-880-1188 for assistance with urgent matters.