

# MAPS Prescription Audit Project

October 17, 2018

Presented by

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Department of Licensing and Regulatory Affairs

[BPL-MAPS@Michigan.gov](mailto:BPL-MAPS@Michigan.gov) | 517-373-1737

# Bureau of Professional Licensing

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- Established in July 2015
- 10 Occupational Licensing/Regulation Boards
- 27 Health Professional Licensing/Regulation Boards
- Boards are advisory and determine sanctions
- License and regulate over 758,000 individuals
- 3 Divisions: Licensing, Investigations & Inspections, Enforcement
- Enforcement Division: Administers Pharmacy and Drug Monitoring Section and Michigan Automated Prescription System (MAPS) Section; investigates overprescribing, over dispensing, and drug diversion



# MAPS Background

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- Contains over 120 million records
- Data maintained for 5 years
- Required reporting of CS Schedule 2-5 from:
  - Prescribers who dispense CS Schedule 2-5
  - Pharmacists (dispensers)
  - Veterinarians



# Prescription Audit Project - Background

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- MCL 333.7333a states “the department shall establish, by rule, and electronic system for monitoring schedule 2, 3, 4, and 5 controlled substances dispensed in this state by veterinarians, and by pharmacists and dispensing prescribers licensed under part 177 or dispensed to an address in this state by a pharmacy licensed in this state...”
- Michigan Board of Pharmacy Rules 338.3162b – 338.3162d outline requirements for MAPS reporting
- Michigan Board of Pharmacy Rule 338.3153(1) states:

A licensee shall keep and make available for inspection all records for controlled substances, including invoices and other acquisition records, but excluding sales receipts, however a copy of each receipt shall be retained for 90 days. Acquisition records, except for executed DEA 222 order forms, may be kept at a central location, subject to the approval of the administrator. The approval shall specify the nature of the acquisition records to be kept and the exact location where the acquisition records will be kept. All records shall be readily retrievable within 48 hours.



# Prescription Audit Project - Background

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- Began August 2017
- Informed Michigan Pharmacist Association (MPA) and Board of Pharmacy prior to launch to reduce confusion among pharmacists



# Prescription Audit Project - Background

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- Prior to project, accuracy of MAPS data was doubted in a Federal case in early 2017
- Results:
  - Government compared 19,000 prescriptions in licensee's medical records to MAPS and found MAPS data was 99.5% accurate
  - Defendant's counsel failed to identify a single error
  - Ultimately was admissible



# Prescription Audit Project

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- 6 Unique data points are reviewed to determine accuracy:
  - Prescriber information (name, DEA number)
  - Patient information
  - Medication (name, strength)
  - Quantity
  - Days supply
  - Date written/issued

# Prescription Audit Project - Process

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1. Generate 25 pharmacies at random from pharmacy license list
2. Generate a MAPS dispenser activity report for 12 months of dispensations and generate 12 prescriptions at random
3. Mail prescription audit letter and attached list of prescription numbers generated to pharmacy
4. Once prescription copies are received, review data points to determine accuracy and document on Summary document





# Prescription Audit Project – Process (cont.)

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5. If errors, send error correction letter to pharmacy
  - 7 days to correct
  - Re-run MAPS dispenser activity to check error corrections
6. If no errors, send confirmation letter
7. If pharmacy repeatedly fails to correct errors, file a complaint against pharmacy and pharmacist in charge for failure to correct data

# Prescription Audit Project – Process (cont.)

## Letter to Pharmacies (original)



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
LANSING

SHELLY EDGERTON  
DIRECTOR

10/2/2018

Pharmacy Name  
Address 1  
Address 2  
City, State Zip

Dear Pharmacist In Charge:

MCL 333.7333a of the Michigan Public Health Code and Michigan Board of Pharmacy's Administrative Rules 338.3162b – 338.3162d require that veterinarians, pharmacists, and dispensing prescribers report dispensed controlled substances, schedules 2 through 5, on a daily basis to the Michigan Automated Prescription System (MAPS).

Additionally, the Michigan Board of Pharmacy's administrative rules require licensees to maintain records for controlled substances and to make them available for inspection by the Department. R 338.3153(1)

Accurate reporting is paramount, as MAPS is a tool used by health professionals, law enforcement, regulatory agencies, and benefit plan managers. In the effort to ensure accurate reporting, MAPS is randomly selecting pharmacies on a monthly basis to audit prescriptions in comparison to the data reported to MAPS.

Pharmacy Name has been randomly selected by MAPS to audit prescriptions in comparison to the data reported.

Please see the attached list of prescriptions selected for MAPS review. Please fax copies of the original prescriptions and a copy of the attachment, in one fax submission, no later than 7/9/2018 to (517) 241-5072.

Should you have any questions, please contact MAPS at (517) 373-1737 or by email at [BPL-MAPS@michigan.gov](mailto:BPL-MAPS@michigan.gov). Thank you for your understanding and cooperation.

Sincerely,

Bureau of Professional Licensing  
Michigan Automated Prescription System  
Ph: (517) 373-1737  
Ex: (517) 241-5072  
[BPL-MAPS@michigan.gov](mailto:BPL-MAPS@michigan.gov)

Enclosure

Pharmacy Name 10/2/2018	
Prescription Number	
1.	124856
2.	124857
3.	124865
4.	125007
5.	125047
6.	125069
7.	125141
8.	125227
9.	125259
10.	125281
11.	125331
12.	125602

\_\_\_\_\_  
Pharmacist-in-charge name

\_\_\_\_\_  
Professional License Number

BUREAU OF PROFESSIONAL LICENSING  
611 W. OTTAWA • P.O. BOX 30670 • LANSING, MICHIGAN 48909  
[www.michigan.gov/bpl](http://www.michigan.gov/bpl) • 517-373-8088



# Prescription Audit Project – Process (cont.)

## Error Correction Letter



RICK SNYDER GOVERNOR      STATE OF MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS LANSING      SHELLY EDGERTON DIRECTOR

10/2/2018

«Pharmacy\_Name»  
«Address\_1»  
«Address\_2»  
«Address\_3»  
«City», «State» «ZIP»

Dear Pharmacist in Charge:

We appreciate your response to our (date) letter requesting copies of certain prescriptions for our review. We have finished inspecting those prescriptions, and the attached table details the errors in the data submitted to the Michigan Automated Prescription System (MAPS) by your facility. Correction of prescription data errors must be completed by (date 11 calendar days from the date of this letter) to maintain compliance with the Board of Pharmacy's administrative rules.

Practitioners rely on MAPS to provide consistent, complete, and accurate information regarding their patients' controlled substance history and to assist them in their effort to prevent controlled substance abuse and diversion; therefore, you can understand why accurate and timely reporting of prescription data by dispensing prescribers is critical for the success of the program. While we realize occasional errors can occur, continuous errors, late submissions, and non-reporting of prescription data affect the integrity of MAPS, so please keep in mind that failure to submit correct prescription data may result in possible sanctions regarding your license and the license of your facility.

In addition, we are asking all licensees required to submit data to MAPS to be mindful that the Michigan Board of Pharmacy rules state all of the following must be on a controlled substance prescription:

Full patient name	Full patient address	Date of prescription	Prescribers signature
Prescriber's DEA#	Prescriber's full address	Prescriber's professional designation	

While the above list is not a comprehensive list, it is frequently the information those receiving MAPS data find most pertinent. For a full list of requirements, please reference Michigan Board of Pharmacy R 338.3161 (1-5).

We welcome the opportunity to help you with any questions you may have regarding the attached information, so please do not hesitate to contact us if you need assistance at 517-373-1737 or by email at [BPL\\_MAPS@michigan.gov](mailto:BPL_MAPS@michigan.gov). Thank you for your understanding and cooperation.

Sincerely,

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Bureau of Professional Licensing  
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Ex: (517) 241-5072  
[BPL\\_MAPS@michigan.gov](mailto:BPL_MAPS@michigan.gov)

To assist in correcting the prescription(s) noted, please review the "User Support Manual" located on our website, [www.michigan.gov/mimapsinfo](http://www.michigan.gov/mimapsinfo), under the "Practitioners and Pharmacists" link. Reference the "Rx Management" section in the User Support Manual.

BUREAU OF PROFESSIONAL LICENSING  
611 W. OTTAWA • P.O. BOX 30670 • LANSING, MICHIGAN 48909  
[www.michigan.gov/bpl](http://www.michigan.gov/bpl) • 517-373-8068

Rx #	Prescriber DEA	Drug	Quantity	Date Written	Patient DOB	Day Supply



# Prescription Audit Project – Process (cont.)

## Summary Sheet (“Checklist”)

«Pharmacy\_Name»  **MAPS DATA SUMMARY**

**Rx Number:** «Rx\_Number»

<b>Patient:</b>	<b>Prescriber:</b>	
«Patient_First_Name»	«Prescriber_First_Name»	<input type="checkbox"/>
«Patient_Last_Name» «Patient_DOB»	«Prescriber_Last_Name» «Prescriber_DEA»	<input type="checkbox"/>
«Patient_Address»	«Prescriber_Address»	<input type="checkbox"/>
«Patient_City» «Patient_State»	«Prescriber_City» «Prescriber_State»	
«Patient_Zip_Code»	«Prescriber_ZIP_Code»	

**Drug:** «Drug\_Name»

**Quantity:** «Qty»

**Day supply:** «Days\_Supply»

**Refills:** «Refill»

**Date written:** «Rx\_Written\_Date»

**date filled:** «Rx\_Fill\_Date»

«Pharmacy\_Name»  **MAPS DATA SUMMARY**

**Rx Number:** «Rx\_Number»

<b>Patient:</b>	<b>Prescriber:</b>	
«Patient_First_Name»	«Prescriber_First_Name»	<input type="checkbox"/>
«Patient_Last_Name» «Patient_DOB»	«Prescriber_Last_Name» «Prescriber_DEA»	<input type="checkbox"/>
«Patient_Address»	«Prescriber_Address»	<input type="checkbox"/>
«Patient_City» «Patient_State»	«Prescriber_City» «Prescriber_State»	
«Patient_Zip_Code»	«Prescriber_ZIP_Code»	

**Drug:** «Drug\_Name»

**Quantity:** «Qty»

**Day supply:** «Days\_Supply»

**Refills:** «Refill»

**Date written:** «Rx\_Written\_Date»

**date filled:** «Rx\_Fill\_Date»



# Prescription Audit Project – Process (cont.)

## Confirmation Letter



RICK SNYDER GOVERNOR      STATE OF MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS LANSING      SHELLY EDGERTON DIRECTOR

10/2/2018

«Pharmacy\_Name»  
«Address\_1»  
«Address\_2»  
«Address\_3»  
«City», «State» «ZIP»

Dear Pharmacist in Charge:

Thank you for providing the Michigan Automated Prescription System (MAPS) section with documentation related to the recent compliance audit. Upon review of the documentation, it has been determined that data submitted to MAPS is accurate compared to the provided hard copy prescriptions. No further action is required from your pharmacy at this time.

We are asking all licensees required to submit data to MAPS to be mindful that the Michigan Board of Pharmacy rules state all of the following **must** be on a controlled substance prescription:

Full patient name	Full patient address	Date of prescription	Prescribers signature
Prescriber's DEA#	Prescriber's full address	Prescriber's professional designation	

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# Prescription Audit Project - Results

- As of September 6, 2018:
  - 84 different pharmacies have been audited
  - Prescriptions: 1,322
  - Data points: 7,932
- Errors:
  - Prescriptions: 69 (5.22%)
  - Data points: 75 (0.95%)

	Prescriber	Medication	Quantity	Date Written	Patient Info	Day Supply
# of Errors	19	0	0	37	2	17
Error Percentage	1.43%	0	0	2.79%	0.15%	1.29%



# Prescription Audit Project – Results (cont.)

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- Accuracy of MAPS data was again doubted in a Federal case in late 2017
- Results:
  - Able to provide USAO statistics on audit project results
  - At the time, 674 prescriptions had been reviewed from 49 different pharmacies, resulting an accuracy rate of 98.99%
  - MAPS data was ultimately admitted as evidence against the defendant

# Questions?

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*Thank You!*



CUSTOMER DRIVEN. BUSINESS MINDED.