

Cabinet and Governor Appointed Agencies' Performance Audit Action Item(s) & Status
Prescription Monitoring Program: Evaluating system processes and program oversight

(See also [cabinet agency response](#) for full context to Washington State Auditor's Office (SAO) [report](#), October 2022)

The Department of Health (Health) was included for this performance audit.

The report offers recommendations to legislators, the Department of Health and the Pharmacy Commission.

SAO Recommendations to Health (Rec) Summary:

1. Continue to work with the Prescription Monitoring Program (PMP) system vendor to develop other methods to monitor pharmacy submissions over time to identify pharmacies with recurring problems.
2. Conduct periodic analyses of PMP data to identify pharmacies that have: a. Not regularly submitted prescriptions to the PMP within one business day of distributing and b. Significant reductions in the number of prescription records uploaded to the PMP compared to their normal activity
3. Once DOH has completed the analyses in recommendations 1 and 2, a. Follow up with these pharmacies and provide guidance to help educate them on submission requirements. b. Develop a process to determine what steps DOH will need to take to educate pharmacies, how the agency will determine if it is ineffective, and when a complaint should be forwarded to the Pharmacy Commission.
4. Update administrative rules [WAC 256-470-030(3)] to align with state law [RCW 70.225.020(3)(b)] to require pharmacies upload data within one business day of distributing prescriptions.
5. Update both rules [WAC 256-470] and the dispenser guide to require pharmacies to include data in the "date sold" field if the prescription has already been sold prior to the time of upload.
6. Establish a process to monitor errors to: a. Ensure pharmacies that have a significant number of errors correct them in a timely manner. b. Identify common types of errors and determine whether it would be appropriate to provide training or additional guidance to pharmacies. c. Notify the Pharmacy Commission if a pharmacy displays a history of excessive errors or fails to correct errors within the required timeline.
7. Establish a timeframe in agency rules to ensure pharmacies correct prescription records in a timely manner. Automatic notifications sent to pharmacies should include the requirements for correcting errors and the consequences for noncompliance.
8. Assess the resources needed to perform this monitoring and determine whether additional funding is needed and should be requested.
9. Clearly document policies and procedures for monitoring pharmacies for compliance, and ensure DOH staff understands and follows them.
10. Before approving any waiver, check the PMP system to see if the requesting pharmacy has reported distributing any controlled substances in the past.
11. Give the Pharmacy Commission a list of the approved waivers.
12. Consult with the agency's assistant attorney general to determine whether DOH has the authority to require pharmacies to perform a reconciliation between the records submitted to the PMP system and their own records. • If DOH has that authority, amend WAC 246-470 to require this reconciliation. • If DOH does not have the authority, then work with the Legislature to update state law to obtain this authority.
13. Ensure all licensed Washington pharmacies receive the system reports needed to ensure that the pharmacy system reconciles to the PMP system.
14. Establish a workgroup to discuss the needs of the Better Prescribing, Better Treatment Collaborative. DOH should serve in an advisory role to this workgroup and explore how it could help it achieve its goals.

SAO Recommendations to the Pharmacy Commission Summary:

15. Establish a process to review controlled substance dispensing and PMP waivers in its inspections and report back to DOH so that PMP program staff can determine the appropriateness of individual waivers once DOH has implemented the step above in recommendation number 11.

16. Incorporate a review of whether pharmacies have completed this reconciliation in their inspections once DOH has implemented the two steps in recommendations 12 and 13.
17. Assess the resources necessary to perform this work and determine whether additional funding is needed and should be requested.

The table below shows the current status of action items the agency initiated to address issues identified in the performance audit report. Please see the [cabinet agency response](#) for additional context and any additional steps already taken.

For an explanation of the columns below, [see the legend](#).

Issue/ Rec	Status	Action Steps	Lead Agency	Due Date	Current Resources?	Budget Impact?	Legislation Required?	Notes
Rec 1-5	Completed	Continue to work with the PMP system vendor to explore new methods to monitor pharmacy submissions and develop and refine the compliance module available in the PMP system	Health	July 31, 2023	NA	NA	NA	The new pharmacy compliance dashboard was released on 9/6/2022. The department continues to work with the PMP vendor to identify improved compliance workflows and paid and unpaid features that may further assist enhancing PMP compliance further.
Rec 1-5	Completed	Conduct periodic analysis of PMP data to identify pharmacies not regularly submitting prescriptions to the PMP within two business days.	Health	July 31, 2023	NA	NA	NA	The PMP team reviews compliance reports for pharmacy submissions weekly and follows up with pharmacies with higher rates of delinquencies to provide education and/or troubleshooting help.
Rec 1-5	Completed	Work with the PMP vendor to explore the feasibility of new functionality that could track variations in dispenser uploads.	Health	July 31, 2023	NA	NA	NA	The PMP team continues to explore enhanced pharmacy compliance features. This is an ongoing conversation between the PMP and the PMP vendor, as well as other PMPs across the country.
Rec 1-5	Completed	Continue to develop, document, and refine PMP compliance processes and pharmacy education to improve pharmacy submission rates and data accuracy in the PMP.	Health	July 31, 2023	NA	NA	NA	In November of 2022, error reports reflected approximately 9400 errors on error report. In of May 2023 the state counts approximately 1100 errors more than 30 days old in the queue. This can be credited to the new compliance dashboard and internal PMP workflows introduced around errors, and education for pharmacy submitters. By summer of

Issue/ Rec	Status	Action Steps	Lead Agency	Due Date	Current Resources?	Budget Impact?	Legislation Required?	Notes
								2024, the error count more than 30 days old typically hovers between 100-200.
Rec 1-5	Completed	Review, revise, and document the process for educating uploaders and Pharmacy Commission Complaints.	Health	Jan. 31, 2023	NA	NA	NA	PMP team created and documented, in the PMP Desk Manual, the new process of education uploaders and handling pharmacy complaints. These workflows will continue to be assessed as we perform weekly errors and delinquency checks and will revise as needed.
Rec 1-5	Completed	Explore the best approach to clarify to pharmacies that they must upload prescriptions within one business day of dispensing.	Health	Sept. 30, 2023	NA	NA	NA	This recommendation required rule making to clarify definitions of 'dispensing' and 'distributing'. Upcoming ASAP standard updates may impact this item in the future as well. Rulemaking was completed early August, 2024, rules to be effective early September, 2024.
Rec 1-5	Completed	Explore the best approach to ensure dispensers report the date a prescription was distributed to a Patient.	Health	Sept. 30, 2024	NA	NA	NA	This recommendation required rule making to clarify definitions of 'dispensing' and 'distributing'. Upcoming ASAP standard updates may impact this item in the future as well. Rulemaking was completed early August, 2024, rules to be effective early September, 2024.
Rec 6-7	Completed	Establish a new process for tracking errors based around the new compliance tracker from the PMP vendor due in fall of 2022.	Health	March 31, 2023	NA	NA	NA	The new pharmacy compliance dashboard was released on 9/6/2022. The department continues to work with the PMP vendor to identify improved compliance workflows and paid and unpaid features that may further assist enhancing PMP compliance further.
Rec 6-7	Completed	Analyze error submissions to determine other common errors and how to best correct them.	Health	March 31, 2023	NA	NA	NA	The PMP team reviews compliance reports for pharmacy submissions weekly and follows up with pharmacies with higher rates of delinquencies to provide education and/or troubleshooting help.

Issue/ Rec	Status	Action Steps	Lead Agency	Due Date	Current Resources?	Budget Impact?	Legislation Required?	Notes
Rec 6-7	Completed	Provide training and guidance to pharmacies on common errors and how to avoid and correct them.	Health	July 31, 2023	NA	NA	NA	The PMP team reviews compliance reports for pharmacy submissions weekly and follows up with pharmacies with higher rates of delinquencies to provide education and/or troubleshooting help.
Rec 6-7	Completed	Notify PQAC of pharmacies that have excessive errors and fail to correct them.	Health	March 31, 2023	NA	NA	NA	The PMP and PQAC leadership met to discuss SAO recommendations and determined the point at which PMP will file formal complaints with PQAC.
Rec 6-7	Completed	Begin working with the PQAC to explore guidelines around “excessive errors” for pharmacies and a reporting process.	Health	July 31, 2023	NA	NA	NA	Along with the above policy on errors and complaints to be filed, the PMP created automated error notification emails that are sent to dispensers on the PMP error reports. The emails request that the corrections be made within 5 business days.
Rec 6-7	Completed	Explore the best approach to set and clarify a timeframe for error corrections.	Health	March 31, 2024	NA	NA	NA	Along with the above policy on errors and complaints to be filed, the PMP created automated error notification emails that are sent to dispensers on the PMP error reports. The emails request that the corrections be made within 5 business days.
Rec 8-9	Completed	Assess new compliance module functionality and determine necessary staff resources based on new features available in the module.	Health	July 1, 2023	NA	NA	NA	After incurring some additional staffing turnover/changes in early 2023 the PMP team has redistributed work flows amongst the team and has determined that all current workflows, including compliance workflows, can be maintained with the current number of FTE's on the team. New features and tools are assessed as they become available.
Rec 8-9	Completed	Review, revise, and train staff on existing procedures. Establish new procedures as	Health	March 31, 2023	NA	NA	NA	The PMP team has been cross trained to the various workflows in use and have them documented in the PMP Desk Manual for reference. Any new workflows

Issue/ Rec	Status	Action Steps	Lead Agency	Due Date	Current Resources?	Budget Impact?	Legislation Required?	Notes
		new functionality and features are available.						will be added to the manual and can be used by staff at any time.
Rec 10-11	In progress	Work with the vendor to schedule the development and release of the waiver withdrawal tool.	Health	July 1, 2023	NA	NA	NA	This tool is currently set to be released in Q4, 2024 or Q1 2025.
Rec 10-11	Completed	Conduct a work session with the PQAC inspectors and the PMP team to develop a system whereby the inspectors can relay the information obtained during their inspections.	Health	March 31, 2023	NA	NA	NA	The PMP team and PQAC leadership met to discuss SAO recommendations. PQAC leadership has instructed pharmacy inspectors to reach out to PMP team if they find pharmacies that are out of compliance with rules or dispensing with a waiver on file.
Rec 10-11	Completed	Begin providing the Pharmacy Commission with a list of pharmacies that have a waiver from reporting to the PMP because they do not dispense Schedule II-V drugs.	Health	March 31, 2023	NA	NA	NA	The PMP sends PQAC a quarterly waiver list of waived dispensers. This list is shared with inspectors so they can reference the list in the course of their inspections.
Rec 12-13	Completed	Consult with an assistant attorney general to determine who has the authority to require pharmacies to perform the recommended reconciliation	Health	March 1, 2023	NA	NA	NA	PMP team consulted with the AG in Dec 2022 to determine who has authority to require pharmacies to perform reconciliations. The PMP team met with PQAC to discuss this recommendation, as well as AAG advice around reconciliation.
Rec 12-13	Completed	Begin to explore the feasibility of requiring PMP reconciliations with PQAC.	Health	July 1, 2023	NA	NA	NA	PMP and PQAC determined it is not feasible at this time to require PMP reconciliations.
Rec 15	Completed	Conduct a work session with the PQAC inspectors to develop a system to ensure they note whether the pharmacies they inspect dispense controlled substances and whether the pharmacies have a waiver	Pharm. Comm.	Jan 31, 2023	NA	NA	NA	The PMP team and PQAC leadership met to discuss SAO recommendations. PQAC leadership instructed pharmacy inspectors to reach out to PMP team if they find pharmacies out of compliance with rules or dispensing with a waiver on file.

Issue/Rec	Status	Action Steps	Lead Agency	Due Date	Current Resources?	Budget Impact?	Legislation Required?	Notes
Rec 15	Completed	Conduct a work session with the PQAC inspectors and the PMP team to develop a system whereby the inspectors can relay the information obtained during their inspections.	Pharm. Comm.	March 1, 2023	NA	NA	NA	The PMP team and PQAC leadership met to discuss SAO recommendations. PQAC leadership instructed pharmacy inspectors to reach out to PMP team if they find pharmacies out of compliance with rules or dispensing with a waiver on file.
Rec 15	Completed	Ensure PQAC stakeholders are aware of this component of the inspection process.	Pharm. Comm.	March 15, 2023	NA	NA	NA	The PMP team and PQAC leadership met to discuss SAO recommendations. PQAC leadership instructed pharmacy inspectors to reach out to PMP team if they find pharmacies out of compliance with rules or dispensing with a waiver on file.
Rec 15	Completed	Implement these processes.	Pharm. Comm.	March 30, 2023	NA	NA	NA	The PMP team and PQAC leadership met to discuss SAO recommendations. PQAC leadership instructed pharmacy inspectors to reach out to PMP team if they find pharmacies out of compliance with rules or dispensing with a waiver on file.