



Arizona State Board of Pharmacy

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Arizona Controlled Substances Prescription Monitoring Program

PMP Clearinghouse Reporting Requirements

If a medical practitioner dispenses a controlled substance listed in schedule II-V, or if a prescription for a controlled substance listed in any of those sections is dispensed by a pharmacy in this state, a health care facility in this state for outpatient use or a board-permitted nonresident pharmacy for delivery to a person residing in this state, the medical practitioner, health care facility or pharmacy must report the following information as applicable and as prescribed by the board by rule.

Currently, the law requires both pharmacies serving outpatients and prescribers who dispense out of their offices to report the dispensing of controlled substances in Schedule II, III, IV and V to the PMP. Mandatory reporting by pharmacies began on October 17, 2008. ASBP began collecting dispensing practitioner's data in October 2009.

- **Are pharmacies now required to report naltrexone dispensations to the CSPMP?**
 - Recently, the Arizona Board of Pharmacy has received many questions regarding the reporting requirements of opioid antagonists to the CSPMP. The questions stem from part of Senate Bill 1087 focusing on ARS 36-2608. The intent of this language was to require naloxone dispensations to be reported to the CSPMP as well as any future fast acting emergency opioid antagonists. At this time, there is no requirement to report naltrexone or any full opioid antagonists to the CSPMP for the maintenance of substance use disorder. Again, please only report naloxone at this time.
- **Where do I need to go to submit data to the AZ CSPMP?**
 - To register for the Arizona CSPMP Clearinghouse, please navigate to https://pmpclearinghouse.net/users/sign_in and click on the "Create an Account" link.
- **How do I report?**
 - As of January 12, 2017, the State of Arizona began requiring pharmacies and providers who dispense out of their office to report controlled substance dispensations to the State of Arizona via PMP Clearinghouse. Dispensations must be reported at least once daily after dispensing the prescription. If you are a chain pharmacy, your data will likely be submitted by your home or corporate office. Please verify this with your corporate office. If you are an independent



pharmacy or a dispensing practitioner that works with a pharmacy or practice management system vendor, please forward the reporting requirements to your software vendor, as they may be able to submit the data on your behalf.

All Arizona pharmacies dispensing controlled substances and all practitioners dispensing controlled substances must report the required dispensing information to Appriss, Inc. (Appriss), a private contractor that collects all data and manages the technical aspects of the program. The PMP Clearinghouse allows users to submit data through the web portal via manual entry using the Universal Claim Form (UCF) or upload of ASAP files. For users who prefer an encrypted transfer method, SFTP access is also available. For details on data submission options, please refer to Section 5 [Data Delivery Methods](#) in the AZ Data Submission User Guide.

- **Am I able to manually upload dispensations to the PMP?**
 - Yes. Pharmacies and providers who dispense can manually enter prescription information into the PMP Clearinghouse system using the Universal Claim Form (UCF) within the PMP Clearinghouse web portal. This form allows you to enter patient, prescriber, dispenser, and prescription information. For step by step instructions please visit section [5.3 Manual Entry \(UCF\)](#) in the Data Submission User Guide.

- **My pharmacy already has a clearinghouse account, can we create another account to be used for a backup individual?**
 - Yes. Clearinghouse allows data submitters to add new users to the system who have the same rights and access to submitting data and viewing file status. This practice allows you to create an account to be used for a backup individual. Please visit section [8.1 Adding Users to Your Upload Account](#) in the Data Submission User Guide for step by step instructions on how to add users to an existing clearinghouse account.

- **What information needs to be included in my data submissions?**
 - The laws and regulations for reporting to the State of Arizona are continuously subjected to amendments. It is the responsibility of dispensers to be aware of such updates as they are enacted and promulgated. This list is not all inclusive, please refer to the [ASAP 4.2 Specifications](#) in the Data Submission Guide for a complete list of specific contents needed within your data submissions.
 - The name, address, telephone number, prescription number, and DEA registration number of the dispenser;



- The name, address, gender, date of birth, and telephone number of the person or, if for an animal, the owner of the animal for whom the prescription is written;
 - The name, address, telephone number, and DEA registration number of the prescribing medical practitioner;
 - The quantity and National Drug Code (NDC) number of the schedule II, III, IV, or V controlled substance dispensed;
 - The date the prescription was dispensed;
 - The number of refills, if any, authorized by the medical practitioner;
 - The date the prescription was issued;
 - The method of payment identified as cash or third party; and
 - Whether the prescription is new or a refill.
- **Are out-of-state pharmacies required to report to the AZ Prescription Monitoring Program if shipping medications into AZ?**
 - Yes, if your pharmacy ships medication to patients in AZ, you would need to report that medication to the AZ CSPMP. Out of state pharmacies that have an active DEA number AND an active AZ pharmacy permit number are required to report to the AZ CSPMP daily. (Please note that in order to ship medications into AZ your pharmacy must have an active AZ pharmacy permit.) You can verify your pharmacy permit status at <https://pharmacy.az.gov/node/5218>
 - **Do veterinarians need to report dispensations to the PDMP?**
 - No, as of now veterinarians are not required to report dispensations to the AZ CSPMP.
 - **I missed a few days of reporting, do I need to go back and report those days?**
 - Yes, AZ requires daily reporting of your controlled substance dispensations. If you have missed any days of reporting you need to be sure and upload all days that were missed.
 - **My pharmacy rarely dispenses controlled substances, do I still need to report daily or can I apply for a waiver from the daily reporting requirement?**
 - The Arizona State Board of Pharmacy decided in its March 22, 2017 meeting to no longer accept waivers for PMP reporting. If your pharmacy has an active DEA number, an active AZ pharmacy permit number, and your pharmacy is not limited to veterinary dispensing, *it would be required to submit a daily report*, including zero reports, for controlled substances schedules II-V. The same reporting requirement exists for dispensing practitioners, there are no waivers. If you are a practitioner that dispenses controlled medication out of your office you are *required to report daily*.



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- **I created a clearinghouse account, but why am I not seeing AZ as an option to upload to?**
 - A user can submit a request to send data to the new state by navigating to Accounts >> Multi State Approval. From this screen, a user can select which state they wish to submit data to. When a new state is selected, the request is sent to the state PMP administrator for the selected state to approve. The state will be identified as pending (yellow) until approval has been granted (green). Until the state PMP administrator has approved the request, data cannot be submitted to the state's PMP system.



- **Where do I go to correct PMP errors?**

- Both pharmacies and dispensing practitioners can access the Error Correction page through your PMP Clearinghouse account. The Error Correction page displays information about the records within a selected data file that need correcting. To access this page, click the “ Pending Dispensation Error ” message in the Status column of the File Listings page or UCF Listings Page. The Correct button, located at the end of each row, allows you to make corrections to the record. Once you click Correct from the Error Correction page, the Errors page is displayed. This page displays detailed information about the records within a selected data file that need correcting, including all the fields contained within the record and the originally submitted value, and allows you to correct those records.

Both pharmacies and dispensing practitioners may also correct errors via file submission. The ASAP 4.2 standard requires a pharmacy to select an indicator in the DSP01 (Reporting Status) field. These indicators allow you to submit new records, revise and resubmit records, and void (delete) erroneous records. Please see section [6.3.3 Error Correction via File Submission](#) for detailed instructions.

- **Will I receive a submission report?**

- Yes, email status reports are automatically sent to all users associated with a specific data submitter account. These reports are used to identify errors in files that have been submitted and to confirm zero report submissions. You will only receive a status report if you are a user associated with the data submitter account.

- **How do I report compounded prescriptions that do not have NDC numbers?**

- When reporting compounded medications to the CSPMP, only the schedule II-V medications within the compound need to be reported. If you are manually entering your prescription information into the Clearinghouse system using the Universal Claim Form (UCF), click the Compound checkbox in the Drug Information section of the page while creating a new Universal Claim Form. Complete the required fields for the first drug ingredient, then click Add New to add additional drug ingredients. Please see the [CDI: Compound Drug Ingredient Detail](#) section of the ASAP 4.2 specifications for a list of specific data needed in your submission file.



- **My pharmacy had a DEA update and is now reporting under a new DEA number, do I need to notify the AZ CSPMP?**
 - Yes, if your pharmacy DEA number changes, and you are now reporting your dispensations under a new DEA number, please contact the AZ CSPMP Administrators at pmp@azpharmacy.gov to make them aware of the change. Without notifying the CSPMP Administrators, your submission account associated with your old DEA number will show as delinquent in reporting.

- **I am a provider that no longer dispenses any controlled substances out of my office, do I need to notify the AZ CSPMP I will no longer be reporting?**
 - Yes, if you are a provider that was previously dispensing medications from your office and reporting to the AZ CSPMP, please notify the CSPMP Administrator that you are no longer dispensing. Without notification, your submission account will show as “Delinquent” in reporting.

- **Are methadone treatment clinics required to report in-office dispensing?**
 - No, methadone treatment clinics are not required to report dispensations to the AZ CSPMP. Per ARS § 36-2608 (F): “The reporting requirements of this section do not apply to the following”:
 - (5) “A facility that is registered by the United States drug enforcement administration as a narcotic treatment program and that is subject to the recordkeeping provision of 21 Code of Federal Regulations section 1304.24.”

- **How do I know I need to report to the AZ CSPMP?**
 - If you are an outpatient dispensing pharmacy that has an active AZ pharmacy permit, an active DEA number, and are not limited to veterinary dispensing, you are required to report to the AZ CSPMP daily. If you are a prescriber that dispenses controlled medication out of your office, you are required to report to the AZ CSPMP daily.

- **My pharmacy is closed on the weekends, do I need to submit a report on the days we are closed?**
 - Yes. On the days your pharmacy or office is closed, you can upload your dispensations the next open business day and include the days that were missed in that submission file.

- **I submitted a zero report but ended up dispensing medication, is there a way I can fix this?**
 - Yes. If you are a pharmacy or dispensing practitioner that submitted a zero report, and then realized you had a dispensation to report, you can upload that



dispensation and it will override the zero report that you already submitted. There is no need to void the zero report.

- **I have been submitting my reports daily under an old DEA number by mistake, do I need to go back and update those reports with my correct DEA number?**
 - Yes. If your pharmacy was issued a new DEA number but your submissions were still being reported under your old DEA, you need to correct those files via file submission or from the Error Correction page via Clearinghouse. You will need to correct the submitted files from the date you were issued your new DEA number. For step by step instructions on how to correct those files, please see section [6.3 Error Correction Page](#) in the Data Submitter Guide.

- **Our pharmacy is a hospital pharmacy with a DEA number and an AZ pharmacy permit, but we do not dispense for outpatient use, are we required to report to the AZ CSPMP?**
 - No. If you do not dispense for outpatient use, you do not need to report to the CSPMP.

- **What is the definition of outpatient and inpatient?**
 - "Outpatient" means an individual who is not a residential patient in a health care institution.
 - "Inpatient" means any patient who receives non-self administered drugs from a hospital pharmacy for use while within a facility owned by the hospital.