Electronic Prescribing of Controlled Substances and PDMP integration

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# Topics

- Electronic prescribing
- Use of PDMPs in electronic prescribing
- Michigan Opioid Laws, CDC Guidelines and Prescribing Practice



- No financial relationships to disclose
- Buprenorphine / Naltrexone provider, A2
- Medical Director Dawn Farm
- Consultant, DEA/DOJ

# Electronic Prescribing Controlled Substances (EPCS)

- Started off as Computerized Physician Order Entry (CPOE)
  - Adopted during Meaningful Use
  - Allowed paper prescriptions
  - NO CS by CPOE initially; later adopted.
- ePrescribing
  - No authentication required after logon
  - No CS
- EPCS



#### ATTENTION DETECTIVE KEVIN MCGUIRE



## Allergic to "naloxone"?

B BOOMMENT CONTAINS YOR PARTOGRAPH, MICHOPPHITED BIOMATURE LINE BLUE PATTERN RACKGROUND, THERMOCHINGMO INK MAMOON A. RASHEED, MD DEA #BR4567092 LIC. #MD055855L NPI # 1760448468 MARK S. TOMICH, PA-C DEA #MT4570203 LIC. #MA059541 NPI # 1841700762 600 NORTH PENN STREET 234 W. MAIN STREET CONNELLSVILLE, PA 15425 UNIONTOWN, PA 15401 (724) 628-3010 TEL., (724) 628-3262 FAX (724) 550-4600 TEL AGE DATE 10/23 18 ADDRESS B Patient is allergic to Aspirin, Nyloxin. LABEL REFILL - 0 - 1 - 2 - 3 - 4 - BRN SUBSTITUTION PERMISSIBI IN ORDER FOR A BBAND NAME BOOD CT TO BE DISPENSED, THE PRESCRIBER MUST HAND-WRITE BRAND NECESSARY OR "BRAND MEDICALLY NECESSARY" IN THE SPACE BELOW.

PP86703-04-18

# Getting started with EPCS: 4 steps

- Find out if your EHR has EPCS
- Identify proofing
- Two factor authentication
- Software access

Find out if your EHR has EPCS
 Inpatient vs outpatient
 Software upgrade may be needed (\$\$\$)

### Identify proofing

- Private practice: EHR will walk you through security questions when EHR was purchased.
  - May require interview with vendor
- Hospital practice: produce MI license and DEA

Two factor authentication

#### Two factor authentication

- Two Step vs. Two Factor
- Two Step:
  - Need password to log on to VPN (virtual private network), then password to log on to hospital server.
  - Google sign on using SMS (texting)
  - Claims of security breaches with SMS

#### Two factor authentication

- Two Step vs. Two Factor
- Two Factor: something you know + something you have



# **Two Factor Authentication**



# **Two Factor Authentication**



## **Two Factor Authentication**



#### Software access

Requires endorsement by another prescriber who already has EPCS access.

# To Send EPCS:

Christensen Recovery Services	riani.	o raileu RA. U	Penu. 2 Pe	nd-0 New-0	Leur- I I Han	eowe.me-o		MacPractice
Select Dr./Staff	Compose Rx	Med Entry	P	rior Auth/Order	s/Resources	Pt. Deta	ails Diagnoses	Admin
Christensen Recovery Services/Rec Prior Auth: Inc-0 Pend-0 New-0 Pro Sheet Orders DME/CPAP/02/Sup Patient: Ann Icteric DOB: 12/3/ Surescripts Benefit/Drug History: no	sources Carl Christe ogress Note Face plies 1952 Gender: Fema t available for this patie	nsen MD Ile Int. PBM: SURES	Compose New: PME/C detail	Rx CPAP/O2/Suppl	les		Designated Dr/Prescribe	r. C. Christensen
	To display Ann Icteri	ic 's drug costs	ar natio	on from their drug	benefit card (la	st updated: Never):	Save	
RxBIN:	R	kPCN: macy Selection N	N	RxGroup: lay pricing inform	ation: Select Pa	RxMember ID:	-	
Pending	Rx Review / Prescri	be Transmit /	Prescribe					
Date	D	rug		Sig	# Ref	ill Source		
06/02/19	Norco 10 mg-325 m	ng tablet	1 ever	ry 4-6 hours	42 0	C. Christensen	EDIT 🔍 🗶	
	Drug	Real-Ti #	ime Benefits: Pt. Pay	Patient- and Pha Pharmacy	armacy-Specifi Total Saving	ic s Mos	Add/Select Pharmacy sage	
Norco 10	mg-325 mg tablet	42	The second second	A		1		
Powered by pharmacy	y RelayHealth - The Patie	nt Pay Amount di	splayed is an es	timate based on the	e selected	Select preferred pharm	nacy to display Benefits Information.	
		Dava Search		Drug Sets	Compounds	Doctor's List	PDMP Automated	
Include 1	obsolete' drugs	Ophthalmic o	only	Insulin+S	upplies	Pediatric Do	osing	
Allergy	/ Intolerance						View Log	
Codeine							Mild	
Norco							Severe	

# Authentication: requires password and token (two factor)



VZVV VVI-FI -	12:40 PM	7 31% L
Q Search		ĘĴ
Requests		
EXC N	OSTAR <sup>®</sup>	
NewCrop	o token is:	02
10	54 4	03
You	r token expires in	15,
		Ð
eRx	+	
NewCrop	Add Account	

# Dispensing History: confirms scrip sent

Dispense Audit Information	-		×
Audit Time 5/24/2019 1:25:08 PM	Network:	Retail	
	User:	Christensen MD, Carl	-
	When:	5/24/2019 1:25:08 PM	
	Status:	Verified	
	Type:	NewRx	
	Quantity:	30	cy - Ypsilanti 1971104
	Refills:	1	
	Destination:	Barron Pharmacy - Ypsilanti 4870 Clark Road Ypsilanti, MI 481971104 (2373176)	
	Fax:	(734) 528-9146	
	Telephone:	(734) 528-9144	
		Details	Done



At day's end, all rx left on this page are unfinished work.

## Resistance to EPCS: New York



Source: MSSNY Member E-Prescribing Survey, December 2015

# Benefits of EPCS

- Literature on benefits in terms of O.D. etc is tied in to PDMPs. However:
- Improved patient safety
- Time savings (vs paper for CS and electronic for non-CS)
- Claims of savings: 15, 769 per FTE\*
- Increased security
- Reduced doctor shopping via medication module and PDMP review
- "Enables Prescriber Pattern Analysis"
- Enhances Patient Satisfaction \*\*

https://go.drfirst.com/hubfs/2016-03-24/2h8klr/8842/141586/EPCS\_Whitepaper\_DrFirst\_3.2016.pdf

\*Clinicians Guide to E prescribing, <u>www.mgma.com</u>, 2011 |

# Benefits of EPCS: DEA

- Stealing/printing prescription pads, and writing non-legitimate paper scrips.
- Altering a legitimate prescription to obtain a higher dose or or more dosage units (change 10 to 40).
- Phoning in non-legitimate prescriptions late in the day when it is difficult for a pharmacy to complete confirmation call to the practitioner's office; and
- Altering a prescription record at the pharmacy to hide diversion from pharmacy stock.
- \$avings due to reduced number of phone calls, and elimination of storage of paper records (\*\*\*)

Econome Impact Analysis of the Interim Final Electronic Prescription Rule. <u>https://www.deadiversion.usdoj.gov/ecomm/e\_rx/eia\_dea\_218.pdf</u> 168 Effect of New York State Electronic Prescribing Mandate on Opioid Prescribing Patterns

D. Danovich, J. Chacko, J. Greenstein, B. Ardolic, N. Berwald

Annals of Emergency Medicine Volume 70, Issue 4, Pages S67-S68 (October 2017) DOI: 10.1016/j.annemergmed.2017.07.195



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	Pre-NYM EPCS (N= 1366)		Post-NYM EPCS (N= 642)	
Arthralgia/Myalgia ( <i>p</i> <0.0001)	272	19.9%	115	17.9%
Back Pain ( <i>p</i> <0.0001)	178	13.0%	86	13.4%
Dental Pain ( <i>p</i> <0.0001)	157	11.5%	64	10.0%
Fracture ( <i>p=</i> 0.0015)	138	10.1%	90	14.0%
Soft Tissue Injury ( <i>p</i> <0.0001)	136	10.0%	55	8.6%
Urolithiasis ( <i>p=</i> 0.0169)	112	8.2%	79	12.3%
Abdominal Pain ( <i>p</i> <0.0001)	109	8.0%	46	7.2%
Other ( <i>p</i> =0.0024)	64	4.7%	34	5.3%
Neuropathic Pain ( <i>p</i> <0.0001)	63	4.6%	21	3.3%
Genital Pain ( <i>p</i> <0.0001)	49	3.6%	15	2.3%
Abscess ( <i>p</i> =0.0195)	35	2.6%	18	2.8%
Headache ( <i>p</i> =0.0011)	18	1.3%	3	0.5%
UTI ( <i>p</i> =0.1266)	14	1.0%	7	1.1%
Post-operative Pain ( <i>p</i> =0.0455)	12	0.9%	4	0.6%
Corneal Abrasion (p=0.2850)	9	0.7%	5	0.8%



Figure 1. Prescriptions by diagnosis category Pre- and Post-NYM EPCS.

Annals of Emergency Medicine 2017 70, S67-S68DOI: (10.1016/j.annemergmed.2017.07.195) Copyright © 2017 <u>Terms and Conditions</u>

# MAPS, the Michigan Opioid Laws, and the CDC Guidelines

# What is this NARx Score???

#### NarxCare Report

<sup>№</sup> Nar<sub>X</sub>Care<sup>™</sup>

Report Prepared: 0	9/28/2018	Date Range: 09/28/2016 - 09/28/2018
Risk Indicators		
NARX SCORES Narcotic Sedative Stimulant 541 481 000	OVERDOSE RISK SCORE 550 (Range 000-999)	ADDITIONAL RISK INDICATORS (2) >- 5 oploid or sedative providers in any year in the last 2 years > 100 MME total and 40 MME/day average

This NarxCare report is based on search criteria supplied and the data entered by the dispensing pharmacy. For more information about any prescription, please contact the dispensing pharmacy or the prescriber. NanxCare scores and reports are intended to aid, not replace, medical decision making. None of the information presented should be used as sole justification for providing or refusing to provide medications. The information on this report is not warranted as accurate or complete.

Relative Risk of Fatal Overdose by NARx score Huizenga, Breneman, Appriss, Inc



- ►<100 1 ►500-599 32
- ► 100-199
  8
  ► 600-700
  56
- ► 200-299 10
  ► 700-800 76
- 300-399 10
   800-900 101
- ► 400-499 16
  ► 900-999 168

https://apprisshealth.com/wp-content/uploads/sites/2/2017/02/NARxCHECK-Score-as-a-Predictor.pdf

#### Drug-Related Overdose Death Rate by Overdose Risk Scores

3.0



Note: Excludes decedents whose death was prior to 2015, because 2 years of prescription history data not available. Overdose Risk Score is the maximum over the entire PDMP history for that patient

## Where there's a will.....

PRESCRIPTIONS
Total Prescriptions: 24

Total Private Pay: 1

Fill Date	ID	Written	Drug	Qty	Days	Prescriber
01/10/2019	+	01/10/2019	Acetaminophen-Cod #3 Tablet	12	3	Sa Hur
01/09/2019	2	01/07/2019	Suboxone 8 Mg-2 MG SL Film	15	7	Ca Chr

## What About Sedatives?

- Benzodiazepines: Xanax, Klonopin, Valium, Librium
- Sleepers: Ambien, Lunesta, Sonata
- Gabapentin, Pregabalin (Lyrica)
- Muscle Relaxers: Flexeril, Robaxin, Zanaflex
  SOMA

# What are the RISKS of Sedatives?

- Benzodiazepines TRIPLE the risk of opioids if you currently uses them.\*
- They DOUBLE the risk even if you have stopped (?)\*
- Benzodiazepines are associated with dementia\*\*
- SOMA: part of the Holy Trinity (Soma, Norco, and Xanax)
- Benzodiazepines may paradoxically increase pain!\*\*\*
- Pregabalin (Lyrica) is the most common non-opioid found to be involved in OD deaths (MAPS data)

https://www.michigan.gov/documents/lara/BPL\_ApprissStatewideOpioidAssessementM ICHIGAN\_03-29-2018\_620258\_7.pdf

\*Park TW et al. BMJ 2015; 350:h2698 \*\*Billioti de Gage S et al. BMJ 2012; 345 e 6231 \*\*\*Ciccone DS et al. J Pain Symptom Manage 2000 Vol 20(3), p180.

	Number of Dispensations (N=103,214,576)		Total Pat (N=7,57	tients <sup>1</sup> 5,033)	De (N=	aths² 4,444)	Deaths per 1,000 Patients with a prescription <sup>3</sup>
Drug Type	n	%	n	%	n	%	
Narcotic <sup>4</sup>	51,117,258	49.53%	6,391,737	84.38%	3366	75.74%	0.52
Buprenorphine MAT	2,171,525	2.10%	72,780	0.96%	380	8.55%	5.82
Sedative	31,028,518	30.06%	2,849,423	37.62%	2924	65.80%	0.97
Stimulant	14,934,746	14.47%	934,717	12.34%	508	11.43%	0.53
Neuropain	1,953,315	1.89%	201,248	2.66%	346	7.79%	1.96
Ginarcotic	373,205	0.36%	116,584	1.54%	64	1.44%	0.52
Steroid	949,011	0.92%	108,737	1.44%	61	1.37%	0.54
Cannabinoid	75,510	0.07%	22,669	0.30%	6	0.14%	0.36
Unassigned	44,431	0.04%	18,216	0.24%	0	0.00%	0.00
Anesthetic	2,006	0.00%	832	0.01%	0	0.00%	0.00
Other	565,074	0.55%	136,163	1.80%	19	0.43%	0.12

included to ensure a full year of history in the PDMP. 4. Narcotic drug type excludes Buprenorphine MAT prescriptions.

While the largest proportion of deaths are associated with narcotic (75.7%) and sedative (65.8%) dispensations, the controlled substances with the highest death rates are those for buprenorphine MAT (5.82 deaths per 1,000 patients),

neuropain (1.96 deaths per 1,000 patients), and sedatives (0.97 death per 1,000 patients).

## Michigan Opioid Laws and the CDC Guidelines: where did "7 days" come from?

- Michigan Law: 7 days CS prescription for acute pain with MAPS report, 3 days without.
- No automatic refills for schedule 3 meds.
- No pre written prescriptions for schedule 2 meds.
- NOTE: if you have to refill a schedule 2 prescription offsite, you MUST have EPCS!

## Michigan Opioid Laws and the CDC Guidelines: where did "7 days" come from?

- CDC Guidelines (#6):
  - Long term opioid use often begins with treatment of acute pain.
  - When opioid are used for acute pain, clinicians should prescribe the lowest effective dose of immediate-release (IR) opioid and should prescribe no greater quantity than needed for the expected duration of pain severe enough to require opioid.
  - Three days or less will often be sufficient; more than seven days will rarely be needed.

## Michigan Opioid Laws and the CDC Guidelines: where did "7 days" come from?

- Exclusions:
- CHRONIC pain (put it on the scrip!)
- End of life care
- Cancer pain

# Opioid selection, dosage duration, follow up and discontinuation : Guideline 6

- Note: it will be impossible to prescribe additional opioids offsite unless you have EPCS available
  - Exception: schedule 3 meds: codeine, tramadol, buprenorphine.
- Do not prescribe ER/LA opioids for treatment of acute pain!
- https://www.michigan.gov/documents/lara/LARA\_DHHS\_Opi oid\_Laws\_FAQ\_05-02-2018\_622175\_7.pdf

# Effect of duration of first use

FIGURE 1. One- and 3-year probabilities of continued opioid use, by duration of first episode in weeks (base case)



Duration is expressed in terms of weeks (1-26) with increments of 1 week. Discontinuation is defined as 180 opioid-free days and allowable gap to assess continuous opioid use in first episode was 30 days. One-week duration is defined as having an episode lasting 7 or more days.

MMWR, March 17, 2017/66 (10); 265-269



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MMWR, March 17, 2017/66 (10); 265-269



# What's wrong with postop pain meds?

(Chad Brummet, MD) JAMA Surgery. 2017; 152 (6): e 170504

- Long term use of opioids after surgery <u>did not depend</u> on the TYPE of surgery (minor vs. major)!
- Overall, 6% of postop patients continued to use opioids.
- Risks for persistent opioid use:
  - Tobacco
  - Alcohol and Substance Use Disorders
  - Mood disorders
  - Anxiety
  - Dose (M.E.D.) <u>did NOT matter</u>\*
  - \*Sekhri, Shaina, et al. "Probability of Opioid Prescription Refilling After Surgery: Does Initial Prescription Dose Matter?." Annals of Surgery (2017).

# First Narcotic Prescription and Future Use (no scrip x 1 year)



Alarge percentage of patients' first narcotic prescription are written in Surgery (15.8%), ED/Urgent Care (14.3%), and Dentistry (16.1%), though these specialties make up 10.2%, 3.6%, and 7.0% of prescribers, respectively

15.1% of patients are still filling narcotic prescriptions 6 months to 1 year after their first narcotic fill





30

Source: Michigan PDMP Oct. 23, 2017, supplemented by NPPESNPI file

Excludes prescribers missing primary specialty classification, Other specialty includes specialties not classified elsewhere; Excludes patients whose first narcotics fill was in 2016, because 1 year of follow-up data not available. Incident narcotic prescriptions were written in 2014 or later; criteria used due to insufficient prescription data prior to 2013.

# Decrease in oxycodone related mortality after PDMP-Florida

Drug and Alcohol Dependence Volume 150, 1 May 2015, Pages 63-68

Abrupt decline in oxycodone-caused mortality after implementation of Florida's Prescription Drug Monitoring Program 🖈

Chris Delcher \* 🖄 🖾, Alexander C. Wagenaar \*, Bruce A. Goldberger <sup>b</sup>, Robert L. Cook <sup>c</sup>, Mildred M. Maldonado-Molina \*

#### Highlights

- A 25% drop in oxycodone-caused deaths occurred after the start of the Prescription Drug Monitoring Program (PDMP) in Florida.
- Our findings suggest that health care provider use of the PDMP played a role.
- Results have implications for national prescription drug abuse policy.

#### AJPH RESEARCH

#### Opioid Overdose Deaths and Florida's Crackdown on Pill Mills

Alene Kennedy-Hendricks, PhD, Matthew Richey, PhD, Emma E. McGinty, PhD, MS, Elizabeth A. Stuan, PhD, Colleen L. Barry, PhD, MPP, and Daniel W. Webster, ScD, MPH

(Am J Public Health. 2016;106:291–297. doi:10.2105/AJPH.2015.302953)

# "Modest Decrease" in opioid prescriptions

Research

#### **Original Investigation**

#### Effect of Florida's Prescription Drug Monitoring Program and Pill Mill Laws on Opioid Prescribing and Use

Lainie Rutkow, JD, PhD, MPH; Hsien-Yen Chang, PhD; Matthew Daubresse, MHS; Daniel W. Webster, ScD, MPH; Elizabeth A. Stuart, PhD; G. Caleb Alexander, MD, MS

JAMA Intern Med. 2015;175(10):1642-1649. doi:10.1001/jamainternmed.2015.3931 Published online August 17, 2015.

# Prescriptions decreased, mortality increased: I-STOP



Drug and Alcohol Dependence Volume 178, 1 September 2017, Pages 348-354



Full length article

Impact of New York prescription drug monitoring program, I-STOP, on statewide overdose morbidity

Richard Brown \* 🖾, Moira R. Riley <sup>b</sup> 😤 🖾, Lydia Ulrich <sup>c</sup>, Ellen Percy Kraly <sup>d</sup> 🖾, Paul Jenkins <sup>b</sup> 🖾, Nicole L. Krupa <sup>b</sup> 🖾, Anne Gadomski <sup>b</sup> 🖾

# PDMP: decrease in pills, no increase in mortality





CrossMark

Prescription drug monitoring programs, nonmedical use of prescription drugs, and heroin use: Evidence from the National Survey of Drug Use and Health

Mir M. Ali a.\*, William N. Dowd b, Timothy Classen c, Ryan Mutter a, Scott P. Novak d

\* Center for Behavioral Health Statistics & Quality, Substance Abuse & Mental Health Services Administration, 5600 Fishers Lane, Rockville, MD 20852, United States

<sup>10</sup> Behavioral Health Economics, RTI International, United States

<sup>c</sup> Department of Economics, Loyola University Chicago, United States

<sup>d</sup> Behavioral Health Epidemiology, RTI International, United States

#### HIGHLIGHTS

· First paper to examine the role of prescription drug monitoring program (PDMP) on individual level opioid related outcomes.

- · Significant association between PDMP implementation and reduction in 'doctor shopping' behavior.
- · No significant associations between PDMP implementation or its associated features on heroin initiation.
- No significant associations between PDMP implementation on nonmedical use/initiation/abuse of opioids.

# PUBLIC HEALTH CODE (EXCERPT) Act 368 of 1978

 (4) A person that receives data or any report under subsection (2) containing any patient identifiers of the system from the department shall not provide it to any other person except by order of a court of competent jurisdiction. Does HIPAA provide extra protections for mental health information compared with other health information?

- Generally, the Privacy Rule applies uniformly to all protected health information, without regard to the type of information. One exception to this general rule is for psychotherapy notes, which receive special protections.
- Psychotherapy notes are treated differently from other mental health information both because they contain particularly sensitive information and because they are the personal notes of the therapist that typically are not required or useful for treatment, payment, or health care operations purposes, other than by the mental health professional who created the notes.

https://www.hhs.gov/sites/default/files/hipaa-privacy-rule-and-sharing-info-related-tomental-health.pdf



U.S. Food and Drug Administration Protecting and Promoting Your Health

### **Drug Safety Communications**

FDA identifies harm reported from sudden discontinuation of opioid pain medicines and requires label changes to guide prescribers on gradual, individualized tapering

#### Safety Announcement

[4-9-2019] The U.S. Food and Drug Administration (FDA) has received reports of serious harm in patients who are physically dependent on opioid pain medicines suddenly having these medicines discontinued or the dose rapidly decreased. These include serious withdrawal symptoms, uncontrolled pain, psychological distress, and suicide.



U.S. Food and Drug Administration Protecting and Promoting Your Health

### **Drug Safety Communications**

While we continue to track this safety concern as part of our ongoing monitoring of risks associated with opioid pain medicines, we are requiring changes to the prescribing information for these medicines that are intended for use in the outpatient setting. These changes will provide expanded guidance to health care professionals on how to safely decrease the dose in patients who are physically dependent on opioid pain medicines when the dose is to be decreased or the medicine is to be discontinued.



U.S. Food and Drug Administration Protecting and Promoting Your Health

### **Drug Safety Communications**

Rapid discontinuation can result in uncontrolled pain or withdrawal symptoms. In turn, these symptoms can lead patients to seek other sources of opioid pain medicines, which may be confused with drug-seeking for abuse. Patients may attempt to treat their pain or withdrawal symptoms with illicit opioids, such as heroin, and other substances.

https://www.hhs.gov/ash /advisorycommittees/pain/reports/ index.html

#### PAIN MANAGEMENT

#### **BEST PRACTICES**



#### PAIN MANAGEMENT BEST PRACTICES INTER-AGENCY TASK FORCE REPORT

Updates, Gaps, Inconsistencies, and Recommendations

**FINAL REPORT** 

# Pain Management Best Practices: Inter-agency Task Force Report

A review of the CDC Guideline (as mandated by the Comprehensive Addiction and Recovery Act legislation): The Task Force recognizes the utility of the 2016 Guideline for Prescribing Opioids for Chronic Pain released by the CDC and its contribution to mitigating unnecessary opioid exposure and the adverse outcomes associated with opioids.

# Pain Management Best Practices: Inter-agency Task Force Report

It also recognizes unintended consequences that have resulted following the release of the guidelines in 2016, which are due in part to misapplication or misinterpretation of the guideline, including forced tapers and patient abandonment.

# Pain Management Best Practices: Inter-agency Task Force Report

The CDC recently published a pivotal article in the New England Journal of Medicine on April 24, 2019, specifically reiterating that the CDC Guideline has been, in some instances, misinterpreted or misapplied.<sup>1</sup> The authors highlight that the guideline does not address or suggest discontinuation of opioids prescribed at higher dosages.



# Questions?



