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October 22, 2018

A.J. Groeber, Executive Director
State Medical Board of Ohio
30 E. Broad Street, 3rd Floor
Columbus, OH 43215

Steven W. Schierholt, Esq., Executive Director
State Board of Pharmacy
77 South High Street, Room 1706
Columbus, Ohio 43215-6126

Dear Directors Groeber and Schierholt:

On behalf of the nearly 5,000 family physician, family medicine resident and medical student members of the Ohio Academy of Family Physicians, I write to express our continued frustration and dismay at the integrity of the data that generated the August OARRS mandatory use compliance reports. We have asked before and we are asking again - if you can't ensure the accuracy and integrity of the data, please stop sending emails to prescribers suggesting that they are failing to follow Ohio law and administrative rules relative to controlled substance prescribing. These prescriber emails should not resume until data integrity is ensured.

Our office has, to date, received dozens of complaints about the August compliance reports that can be summarized as follows:

- ICD-10 Codes Required by EMR - The largest number of complaints focuses on compliance reports that indicate that ICD-10 codes are missing. Physicians are using EMR systems that require that the ICD-10 code be on the script in order for the script to be sent to the pharmacy. So there is no question that the ICD-10 code is on the script. So why is the prescriber being told they are at fault that the ICD-10 code is missing and it is up to them to figure out what went wrong? Is this a pharmacist problem or a system problem? Whatever the case, for physicians who are using an EMR that requires ICD-10 codes, the physician isn't the problem. Don't blame the physician and expect the physician to figure out what the problem is.

- Incorrect Medical License Number - The second largest number of complaints pertains to emails addressed to a physician but listing an incorrect medical license number. Clearly, tying a physician to the wrong medical license number does not instill great confidence in the integrity of any of the data contained in the communication. A communication to a licensed physician with the wrong medical license number from the state's licensing body is embarrassing and inexcusable.

See additional details on the following page.

- Hospice Patients - The third largest number of complaints concerns a problem that we have brought to your attention numerous times. Hospice patients and skilled nursing facility patients are exempt from reporting requirements but continue to show up in the prescribers' compliance reports.

- ICD-10 Codes Missing for Gabapentin - Next, is the prescriber being faulted for ICD-10 codes missing from gabapentin scripts. Per information on the State Medical Board website, ICD-10 codes are not required for gabapentin, only a statement of intended days-supply is required. (http://med.ohio.gov/Portals/0/Resources/Prescriber%20Resources/AcuteRulesHandout.pdf) So why are gabapentin scripts with no ICD-10 code showing up in OARRS compliance reports?

- Not Practicing Medicine - And finally, in one particularly concerning complaint, a physician received a non-compliance report for August when the physician was not even practicing medicine.

As we have stated in previous letters and meetings, primary care physicians are busy; their time needs to be spent with patients, delivering patient care, not trying to figure out what is wrong with the erroneous data OARRS is sending them. A 2016 study published in the Annuals of Internal Medicine found that during a typical day, primary care physicians spend 27% of their time on clinical activities and 49% on administrative activities. These data-challenged compliance reports contribute to administrative burden which, in turn, contributes to physician burnout and physician workforce shortages.

Conscientious prescribers work hard to maintain best practices in complying with the ever-changing laws and regulations governing OARRS. Prioritizing OARRS data integrity is imperative in making the OARRS system a helpful tool for physicians. Email communications about flawed data need to stop until the integrity of the data is ensured.

We request a written response to this letter with an explanation as to issues summarized above. Physicians deserve accurate data so that areas of real concern can be appropriately addressed.

Sincerely,

Stan Anderson, MD
President

CC: The Honorable John Kasich
Governor, State of Ohio
77 South High Street - 30th Floor
Columbus, OH 43215

Chad Garner
OARRS Administrator
State Board of Pharmacy
77 South High Street, Room 1706
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