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American Academy of Pediatrics

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Maryland Chapter



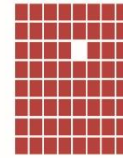
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Maryland Chapter AMERICAN COLLEGE OF EMERGENCY PHYSICIANS

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TO: The Honorable Shane E. Pendergrass, Chair
Members, House Health and Government Operations Committee
The Honorable Robbyn Lewis

FROM: Pamela Metz Kasemeyer
J. Steven Wise
Danna L. Kauffman
Richard A. Tabuteau

DATE: February 27, 2019

RE: **OPPOSE** – House Bill 847 – *Prescription Drug Monitoring Program – Disclosure of Data – Managed Care Organizations*

The Maryland State Medical Society, the Maryland Chapter of the American Academy of Pediatrics, the Maryland Chapter of the American College of Emergency Physicians, the Maryland Section of the American College of Obstetricians and Gynecologists, and the Mid-Atlantic Association of Community Health Centers, **strongly oppose** House Bill 847

House Bill 847 would require the Prescription Drug Monitoring Program (PDMP) to disclose prescription monitoring data to a managed care organization (MCO) purportedly for the purpose of: complying with: (i) the corrective managed care program of the Medicaid pharmacy program; or (ii) the standards developed by the Medicaid opioid drug utilization review workgroup.

First and foremost, it is important to recognize that the MCOs have information on their own enrollees' prescription data through claims data and can coordinate with the Maryland Medicaid Fee for Service program with respect to fee for service claims. Second, there is nothing reflected in the policy recommendations of the Medicaid opioid drug utilization review workgroup that requires direct access to PDMP data by the MCOs. The recommendations can be found at <https://mmcp.health.maryland.gov/healthchoice/opioid-dur-workgroup/Pages/healthchoice-opioid-response.aspx>. Third, in providing data to other entities under the statute, it is clearly only when there has been a subpoena issued or there is an investigation, neither which would be required under House Bill 847.

We do not believe that there is a legitimate and rational basis for providing access to PDMP data to MCOs. MCOs can utilize their claims data and communicate directly with treating providers if they believe there is an issue related to medical necessity, utilization, or other issues associated with a patient's history or provider's practice patterns. This bill simply erodes the current principles of why the PDMP was established. The PDMP must remain a health care tool to inform the prescribing practices of physicians and not a tool for enforcement or profiling by MCOs or insurers. An unfavorable report is requested.

For more information call:

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