

## **Responding to MPDR Compliance Audit Findings**

The purpose of this Fact Sheet is to assist pharmacies in resolving reporting issues identified by the Montana Prescription Drug Registry (MPDR) during a routine Pharmacy Compliance Audit. The MPDR's most recent audit identified your pharmacy as being out of compliance with MPDR reporting requirements, as detailed in the audit letter you received with this Fact Sheet.

**Before taking any other actions**, go to the MPDR's home page at [www.MPDR.mt.gov](http://www.MPDR.mt.gov) and download the MPDR Reporting Guide for Pharmacies (Reporting Guide). The Reporting Guide provides detailed, illustrated instructions for interacting with the MPDR's online services.

**Failure to promptly correct all problems identified during an MPDR Pharmacy Compliance Audit may result in a complaint being filed with the Board of Pharmacy. Both the pharmacy and the Pharmacist-In-Charge (PIC) may face disciplinary action from the Board.**

### **What Are the MPDR's Reporting Requirements?**

Refer to **page 5** of the Reporting Guide.

### **Can We Be Excused from Submitting Zero Reports?**

Refer to **Page 9** of the Reporting Guide.



### **Audit Finding: The pharmacy has not registered to report to the MPDR.**

1. Check the license number identified in the MPDR audit letter. If this is a new license that was issued to a previously-licensed pharmacy in response to a change of ownership or location, then the pharmacy may not have registered the new license, and may still be reporting under the old license. Refer to **Page 11** of the Reporting Guide to resolve this registration issue.
  - All future MPDR reports must be submitted under the new license. You may need to contact your software vendor or your pharmacy's corporate office for assistance.
  - If the pharmacy was previously excused from submitting zero reports, a new MPDR Zero Reporting Attestation Form must be submitted for the new license number. Refer to **Page 9** of the Reporting Guide.
2. If there has been no change of pharmacy ownership or location, then follow the registration instructions beginning on **Page 10** of the Reporting Guide.
  - If the pharmacy does not dispense controlled substances in Montana, you must immediately register and submit a Zero Report to the MPDR. In addition, the pharmacy may be eligible to be excused from submitting future Zero Reports to the MPDR. Refer to **Page 9** of the Reporting Guide for more information.

# FACT SHEET: RESPONDING TO COMPLIANCE AUDIT FINDINGS



MONTANA PRESCRIPTION  
**DRUG REGISTRY**  
Check the history. It matters.

## **Audit Finding: The pharmacy is not submitting timely reports to the MPDR.**

1. Check the license number identified in the MPDR audit letter. If this is a new license that was issued to a previously-licensed pharmacy in response to a change of ownership or location, then the pharmacy may not have registered the new license, and may still be reporting under the old license. Refer to **Page 11** of the Reporting Guide to resolve any outstanding registration issues.
  - All future MPDR reports must be submitted under the new license. You may need to contact the pharmacy's software vendor or corporate office for assistance.
2. If the pharmacy's software vendor or corporate office is reporting to the MPDR, then follow the instructions beginning on **Page 25** of the Reporting Guide to determine which of your pharmacy's prescriptions have been submitted to the MPDR and which ones are missing.
  - Work with the pharmacy's software vendor or corporate office to report any missing data to the MPDR, and to ensure that all future reports are submitted in a timely manner.
3. If the pharmacy does not dispense controlled substances in Montana, then the pharmacy may be eligible to be excused from submitting zero reports to the MPDR.
  - The pharmacy is required to submit timely zero reports until the MPDR Zero Reporting Attestation Form has been received and approved in writing by the MPDR; refer to **Page 9** of the Reporting Guide.
  - The pharmacy must also submit any missing zero reports from prior reporting periods; refer to the zero reporting instructions on **Page 21** of the Reporting Guide.
4. To submit data to the MPDR, follow the reporting instructions beginning on **Page 20** of the Reporting Guide. You may need to work with the pharmacy's software vendor to identify what action must be taken in the pharmacy's computer system to initiate an MPDR report.
  - The pharmacy is required to submit all missing data from the date of Montana licensure and forward, and to ensure that all future reports are submitted in a timely manner.

## **Audit Finding: The pharmacy has not corrected and resubmitted reporting errors in a timely manner.**

The pharmacy is required to correct and resubmit all prescriptions that received errors or warning messages; corrections must be received by close of the next business day after the original MPDR submission was made. Refer to **Pages 25 through 28** of the Reporting Guide for instructions on how to identify reporting errors. Refer also to **Page 30** for instructions on how to correct MPDR data.

**If you have reviewed the recommended pages of the MPDR Reporting Guide for Pharmacies and still have questions, please contact MPDR staff at [dlibsdpdr@mt.gov](mailto:dlibsdpdr@mt.gov) or 406-841-2240.**