

SBAR: Request to add promethazine/codeine and pregabalin to PDMP

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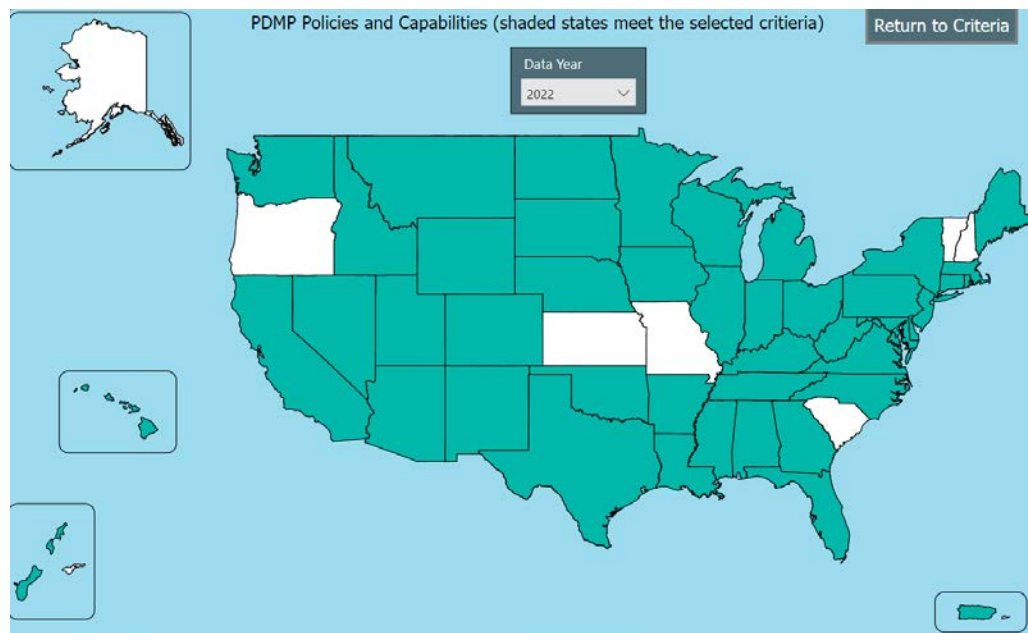
Situation:

- Promethazine with codeine and pregabalin are schedule V medications that are not reported to the Oregon PDMP.
- Promethazine with codeine is indicated for cough, is frequently abused, sought by fraudulent means, and a target of pharmacy robberies.
 - 2 major pharmacy chains no longer stock promethazine with codeine- Walmart (effective 11/19/2021) and Rite Aid (effective 8/1/2022).
 - The board has received requests from licensees requesting promethazine with codeine be added to the PDMP.
- Pregabalin is indicated for a variety of neurological conditions (e.g. seizures, pain, anxiety), is misused to potentiate the ‘high’ of other substances – similar to gabapentin (another gabapentinoid), and carries a risk of respiratory failure when used in combination with opioids or other central nervous system depressants.

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Background:

- In 2009, SB 355 established the PDMP.
- In 2011, pharmacies began uploading schedules II-IV to the PDMP
- In 2020, gabapentin and naloxone were added to the PDMP
- In 2018, Oregon’s Secretary of State Recommended that OHA take the following actions to more effectively operate the PDMP within existing state statutes and rules:
 - “12. Allow for additional information to be collected by the PDMP. This should include:
 - a. prescriptions for Schedule V controlled substances and other drugs of concern;”
- Oregon is 1 of 7 states that does not require schedule V medications be included in PDMP reports.



• Figure 1- <https://www.pdmpassist.org/Policies/Maps/PDMPPolicies>

Related Resources

- Drug Enforcement Administration / US Department of Justice

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| | <ul style="list-style-type: none"> ○ Two Washington Men and an Oregon Man Charged with Conspiracy to Obtain Controlled Substances by Fraud ○ Florida-Based Pharmaceutical President Indicted in Counterfeit Promethazine-Codeine Drug Trafficking Conspiracy ○ 14 Charged With Writing Fake Prescriptions To Make “Lean” ○ Nine Indicted in Counterfeit Promethazine-Codeine Drug Trafficking Conspiracy ○ Chicago Woman Sentenced for Obtaining Promethazine with Codeine by Fraud • Oregon Secretary of State Audit <ul style="list-style-type: none"> ○ Report 2018-40 OHA Health Authority Constraints on Oregon's Prescription Drug Monitoring Program Limit the State's Ability to Help Address Opioid Misuse and Abuse ○ Report 2022-07 Recommendation Follow-up Report: Oregon Health Authority Some Constraints Still Remain in Oregon’s Prescription Drug Monitoring Program • US Food and Drug Administration <ul style="list-style-type: none"> ○ FDA warns about serious breathing problems with seizure and nerve pain medicines gabapentin (Neurontin, Gralise, Horizant) and pregabalin (Lyrica, Lyrica CR) • Other Articles <ul style="list-style-type: none"> ○ How Gabapentin Differs From Pregabalin. Pharmacy Times. September 2015. ○ Evoy KE, Sadrameli S, Contreras J, Covvey JR, Peckham AM, Morrison MD. Abuse and Misuse of Pregabalin and Gabapentin: A Systematic Review Update. Drugs. 2021 Jan;81(1):125-156. doi: 10.1007/s40265-020-01432-7. PMID: 33215352. <p><u>Related Statutes and Rules:</u></p> <ul style="list-style-type: none"> • ORS 431A.855(1)(a) The Oregon Health Authority, in consultation with the Prescription Monitoring Program Advisory Commission, to establish and maintain a prescription monitoring program for monitoring and reporting of: <p>(A) Prescription drugs dispensed by pharmacies licensed by the State Board of Pharmacy that are classified in <u>schedules II through IV</u> under the federal Controlled Substances Act, 21 U.S.C. 811 and 812, as modified by the board by rule under ORS 475.035;</p> <p>(B) Prescribed <u>gabapentin</u> and naloxone dispensed by pharmacies; and</p> <p>(C) <u>Other drugs</u> identified by rules adopted by the authority.</p> <p>(b)(A) To fulfill the requirements of this subsection, the authority shall establish, maintain and operate an electronic system to monitor and report drugs described in paragraph (a) of this subsection that are dispensed by prescription.</p> • OAR 333-023 |
| A | <p>Assessment:</p> <ul style="list-style-type: none"> • Promethazine with Codeine is known to be diverted and abused for recreational purposes. • Pregabalin is known to be misused and when taken in combination with CNS depressants can result in serious breathing problems. • Board to discuss if adding promethazine with codeine and pregabalin to the PDMP is in the best interest of the public health and safety. • Board will need to provide direction to board staff to write an official communication to the Oregon PDMP program requesting the addition. |
| R | <p>Recommendation:</p> <ul style="list-style-type: none"> • Board discussion |

Board Review Date: 8/12/2022