

# Policies

## **Practitioner's Use of Delegates for Querying Purposes**

A delegate is an agent or employee of a prescriber or dispenser to whom the task of accessing K-TRACS data has been assigned. Delegates have been allowed because time is limited for prescribers and dispensers. Delegates must be licensed, registered, or certified by a state regulatory or administrative agency.

Any licensed prescriber or dispenser who is registered with the K-TRACS program as a Data Requester can have up to 2 delegates. There is an exception to the limit on delegates for ERs and other settings where staff rotates shifts. To request an exemption, contact the K-TRACS staff at [pmpadmin@pharmacy.ks.us](mailto:pmpadmin@pharmacy.ks.us).

The Data Requester will be held responsible for their delegates' use of the system. The Data Requester should request their delegates' querying history periodically to confirm compliance with the PMP Act. The Data Requester should also notify the K-TRACS office when a delegate is no longer employed with them so that their access can be deactivated.

## **K-TRACS Reports and a Patient's Permanent Medical Record**

Information contained in the K-TRACS report is privileged medical treatment information that should not be shared or discussed with anyone who is not, in some way, involved in the provision of medical treatment of the subject in the report. A K-TRACS report is a direct reflection of medical records that exist on site at the dispensing pharmacies. The report should be viewed as a snapshot of the patient's controlled substance history at a given point in time, based on records available at the pharmacy level.

PDMP legislation does not have restrictions regarding the management of patient medical records. Conversely, the opinion of the K-TRACS Advisory Committee is that the PDMP Patient History Report should not be filed in the patient medical chart or in a separate file. This measure will prevent unauthorized disclosure of the PDMP Patient History Report from being accessed and distributed by unauthorized individuals. If the K-TRACS Report is to be stored alongside other patient medical records, it must be clearly marked "Do Not Copy," and it should never be included when sending a patient's medical records to another health provider, as the contents of the report are subject to change.

Users are permitted to contact other health providers to discuss the contents of a K-TRACS report as it relates to the care of a mutual patient. If another health provider wishes to obtain their own hard copy of a patient's K-TRACS report, they should be advised to establish their own user account with K-TRACS and submit a separate request for the report. The report, or the contents of the report, should not be faxed, mailed, emailed or otherwise disseminated.