

**AUTHENTICATION OF DATA USERS
PDMP MODEL ACT
STATE PROFILES**

NATIONAL PDMP MEETING

September 25, 2009

Washington, DC

AUTHENTICATION OF DATA USERS

Why Review This Subject?

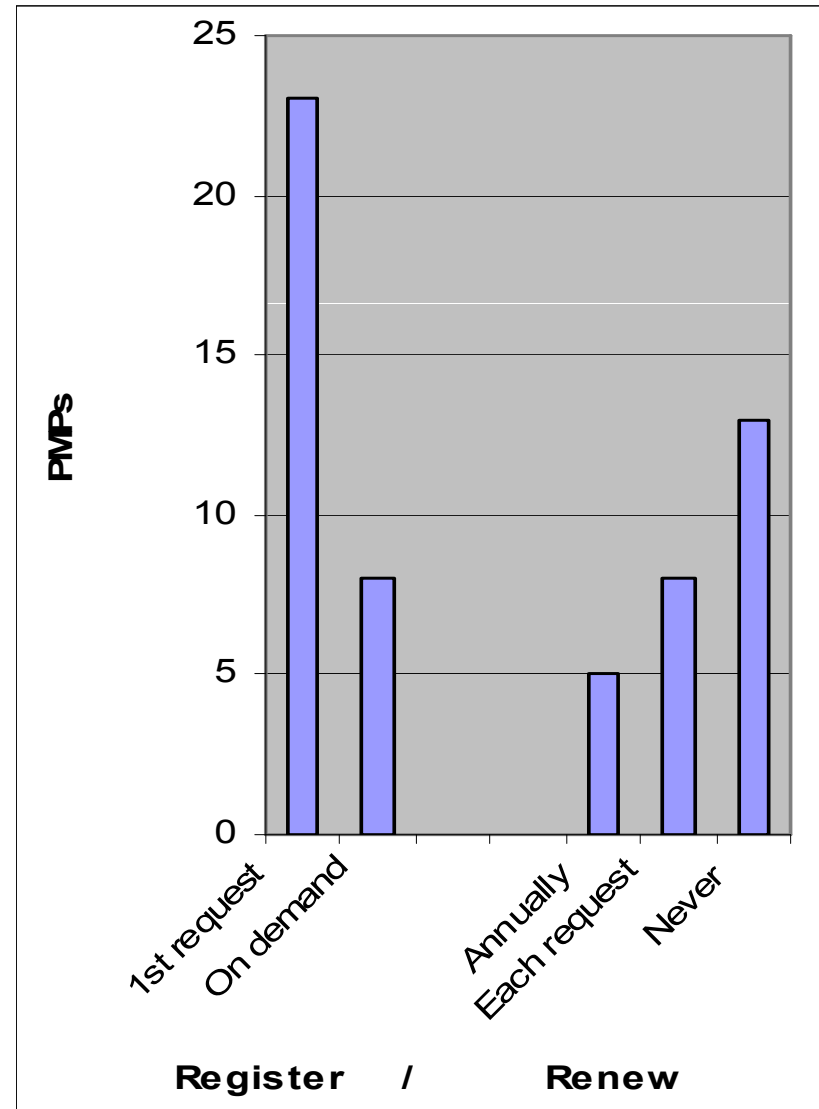
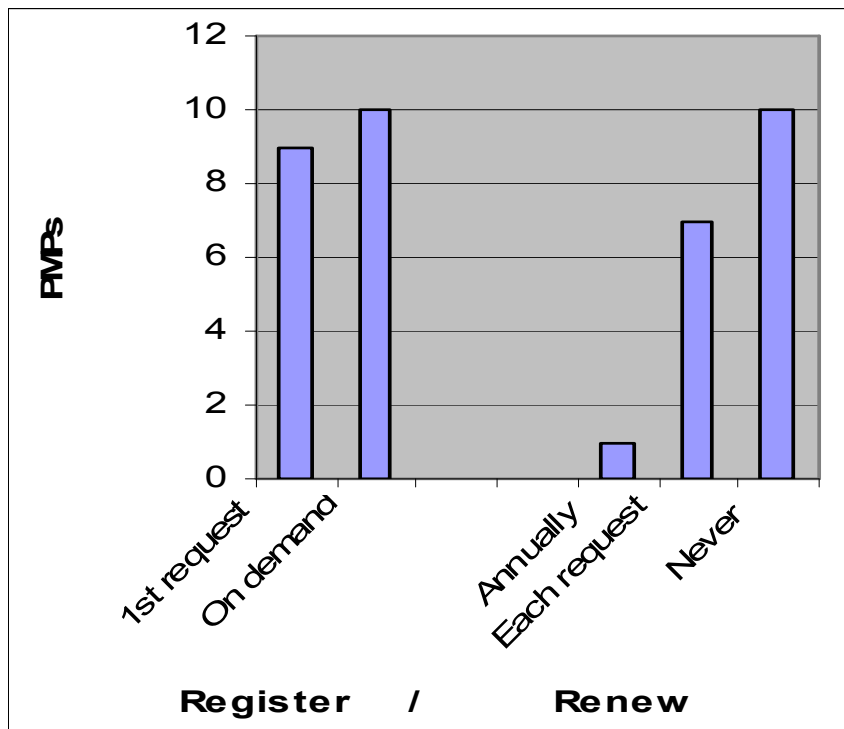
AUTHENTICATION OF DATA USERS

- 2007 - IJIS Institute PMP Committee Survey:
- Disclosing PDMPs:
 - Require out-of-state data requesters to meet same requirements as within disclosing state
 - But want requesting PDMPs' to authenticate the users in requesting state.
- BUT - PDMPs have different requirements and procedures.
- 2009 Survey Update – differing requirements and procedures expand.

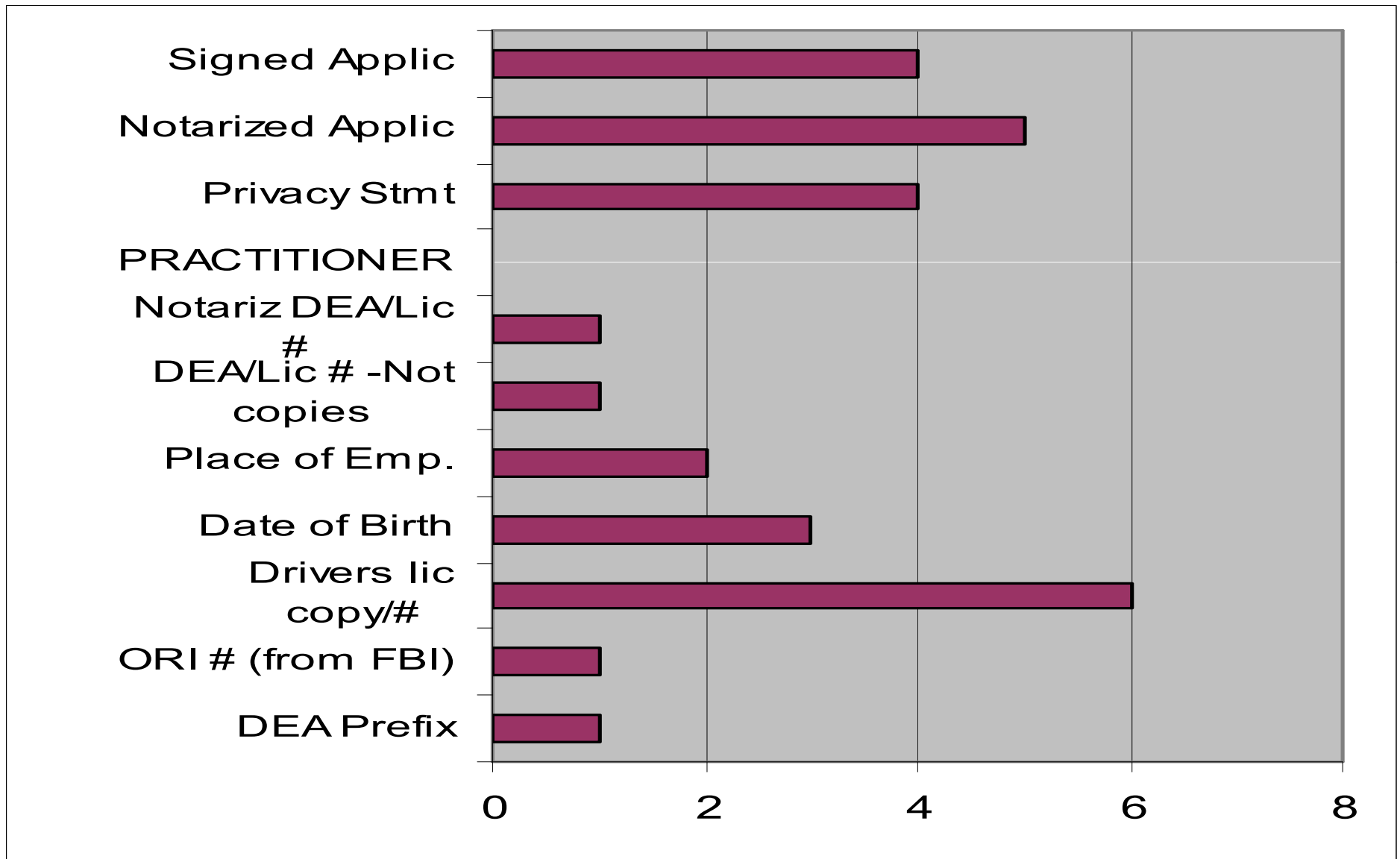
EXAMPLE 1: Registration & Renewal

2006 - 31 States

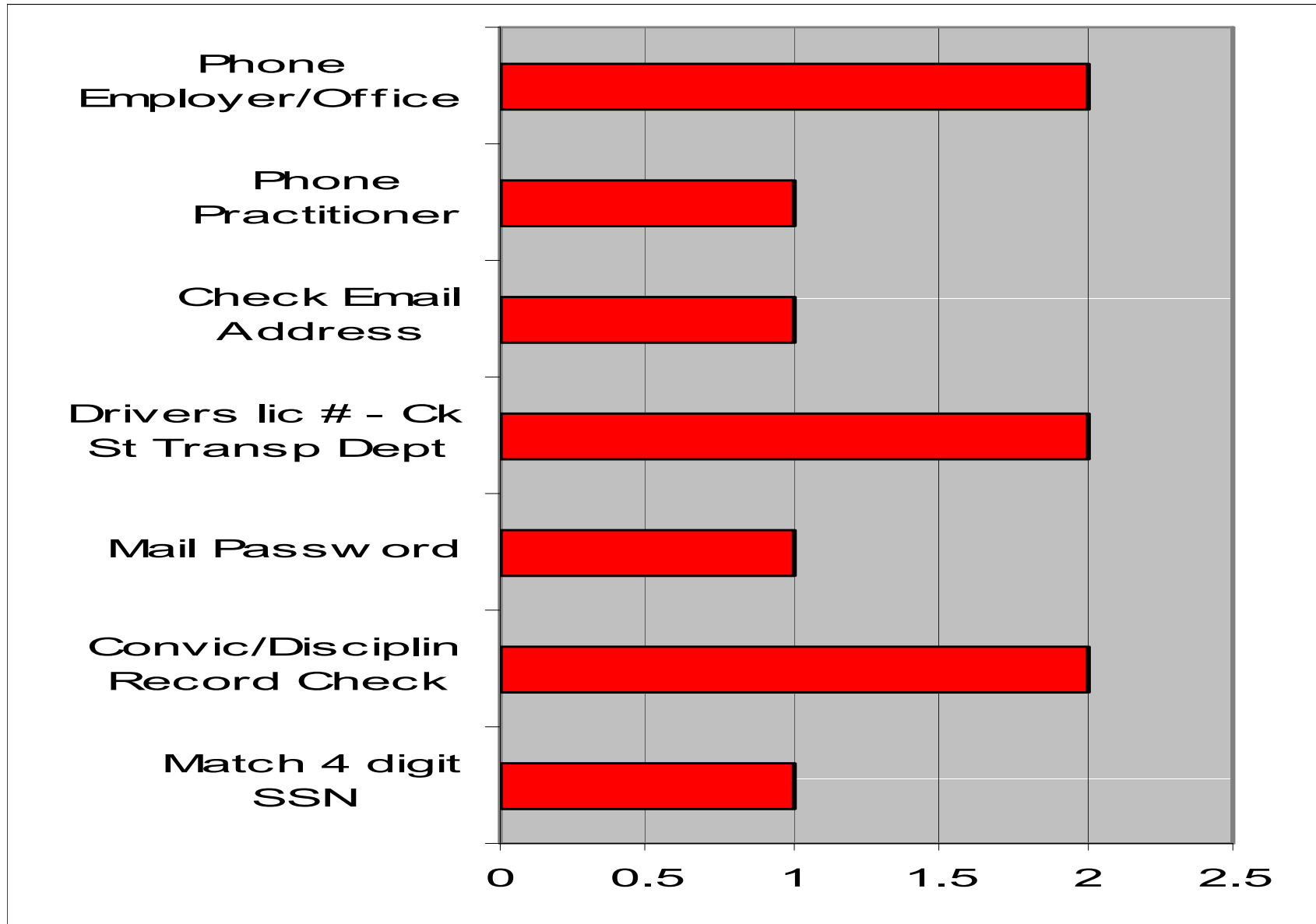
2009 – 38 States



EXAMPLE 2: Requesters Must Submit



EXAMPLE 3: How PMPs Verify Applications?



AUTHENTICATION OF DATA USERS

- 2009 – SAMHSA established NASPER Funding Grants:
 - Appendix F – Minimum Requirements for Authentication and Certification
- SAMHSA accepted almost all of the Alliance's recommendations for modifying the proposed minimum requirements.
- **THANK YOU, SAMHSA**

AUTHENTICATION OF DATA USERS

Questions for NASPER Grants:

Example 1: Apparently a PMP receiving NASPER funds cannot disclose data to a requesting PMP unless:

- Both states meet NASPER authentication requirements.
- Both states have an approved NASPER grant.
- Can this change to encourage interstate data sharing?

Example 2: NASPER requires notarized applications for access to PMP data.

- Some states require notarized applications for professional health care licenses.
- Can the license application substitute for notarizing the data access application?

AUTHENTICATION OF DATA USERS

Other Authentication Issues:

- Example 1: What can PDMPs learn from authentication/certification methodologies of other data systems?
- Example 2: Is security jeopardized if PMPs establish data users' IDs and their passwords on-line?

Committee on Authentication of PMP Data Users

- John Gadea, CT
- Dave Hopkins, KY
- Roseann Rodriguez, CO
- Cheryl Ruff, SC
- Don Vogt, OK
- Theresa Witkowski, IA
- Jim Giglio, Alliance Executive Director
- Chris Baumgartner, Alliance Project Manager
- Steve Bruck, Security Consultant
- Rebecca Rose, BJA
- John Eadie, Committee Chair

Committee on Authentication of PMP Data Users

Topics:

- With Steve Bruck, review other data systems' authentication procedures.
- Identify “Best Practices” for PDMP authentication.
- Draft Guidelines for PDMPs -- minimally acceptable up to best practices.
- Report to ASPMP annual meeting in October.
- Work with SAMHSA on NASPER minimum requirements.

PDMP MODEL ACT

Why Review This Subject?

PDMP MODEL ACT

Data Element Changes?

- ASAP Standard now includes new data elements, for example, method of payment, and ID of person dropping off or picking up the prescription.
- The data elements list in the Model Act doesn't include these changes.

PDMP MODEL ACT

Out-of-State and Mail Order Pharmacies?

- Mail order pharmacies and regular pharmacies are increasing out-of-state prescription shipping.
- The Model Act does not adequately address this issue.

Data Security

- The focus on PDMP data security has increased since the Model Act was last updated in 2002

PDMP MODEL ACT

2007 - IJIS Institute PMP Committee Survey Report:

- 5.5.3 “Several states’ survey comments / explanations stated their laws prevent them from sharing data with other PMPs...”
- “Other PMPs reported their laws do not permit bulk transfer of data...”
- The Model Act does not have language on these issues.

PDMP MODEL ACT

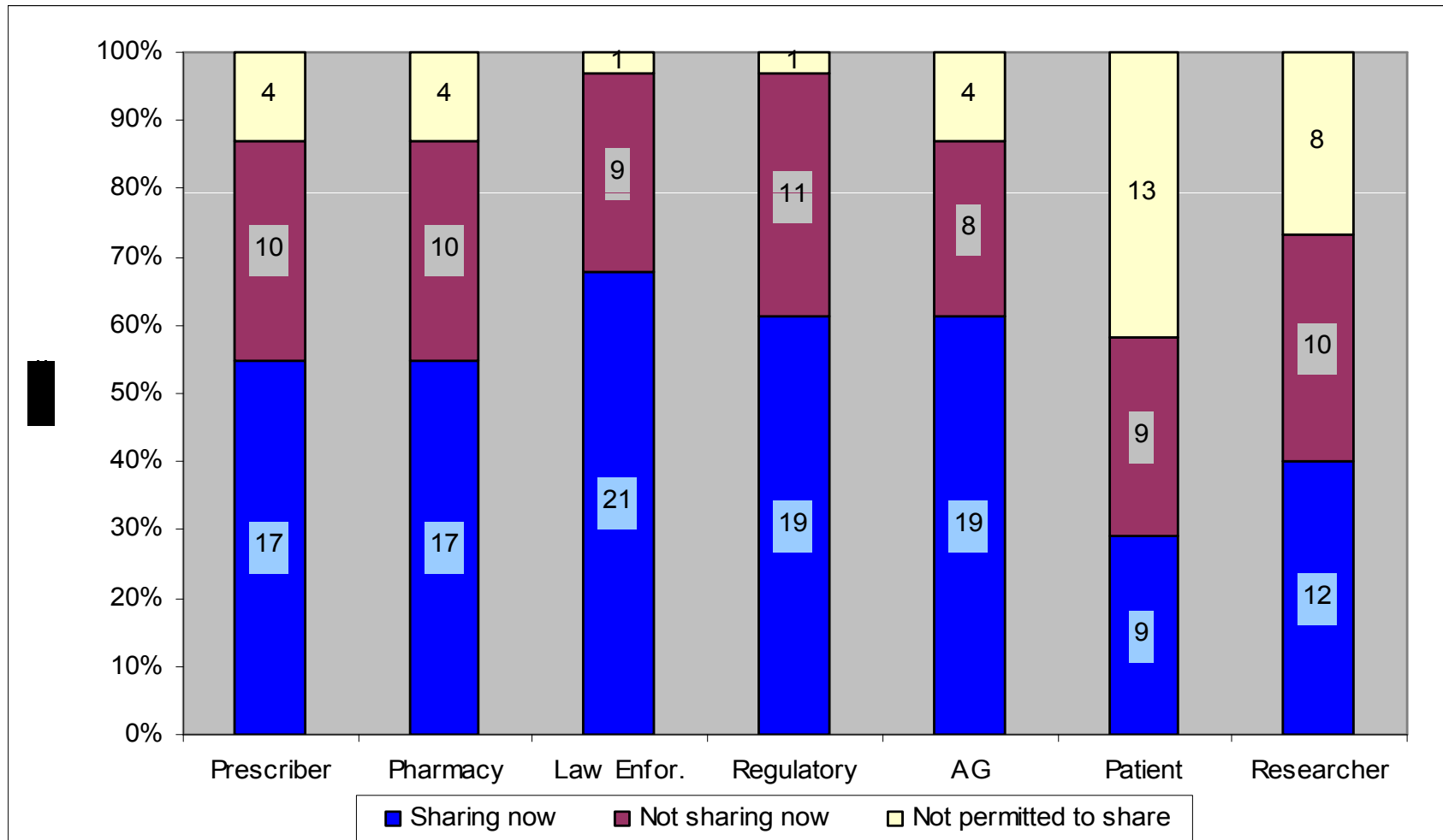
2007 - IJIS Institute PMP Committee Survey Report:

- “The findings from Questions 2, 3, 6 and 7 indicate there is wide variation between PMPs regarding the types of end users who have access to PMP data.”
- The answers to these same questions also reveal a wider variation between who has access to solicited reports and who has access to unsolicited reports.”

Intrastate Sharing Practices and Permission

*** Solicited ***

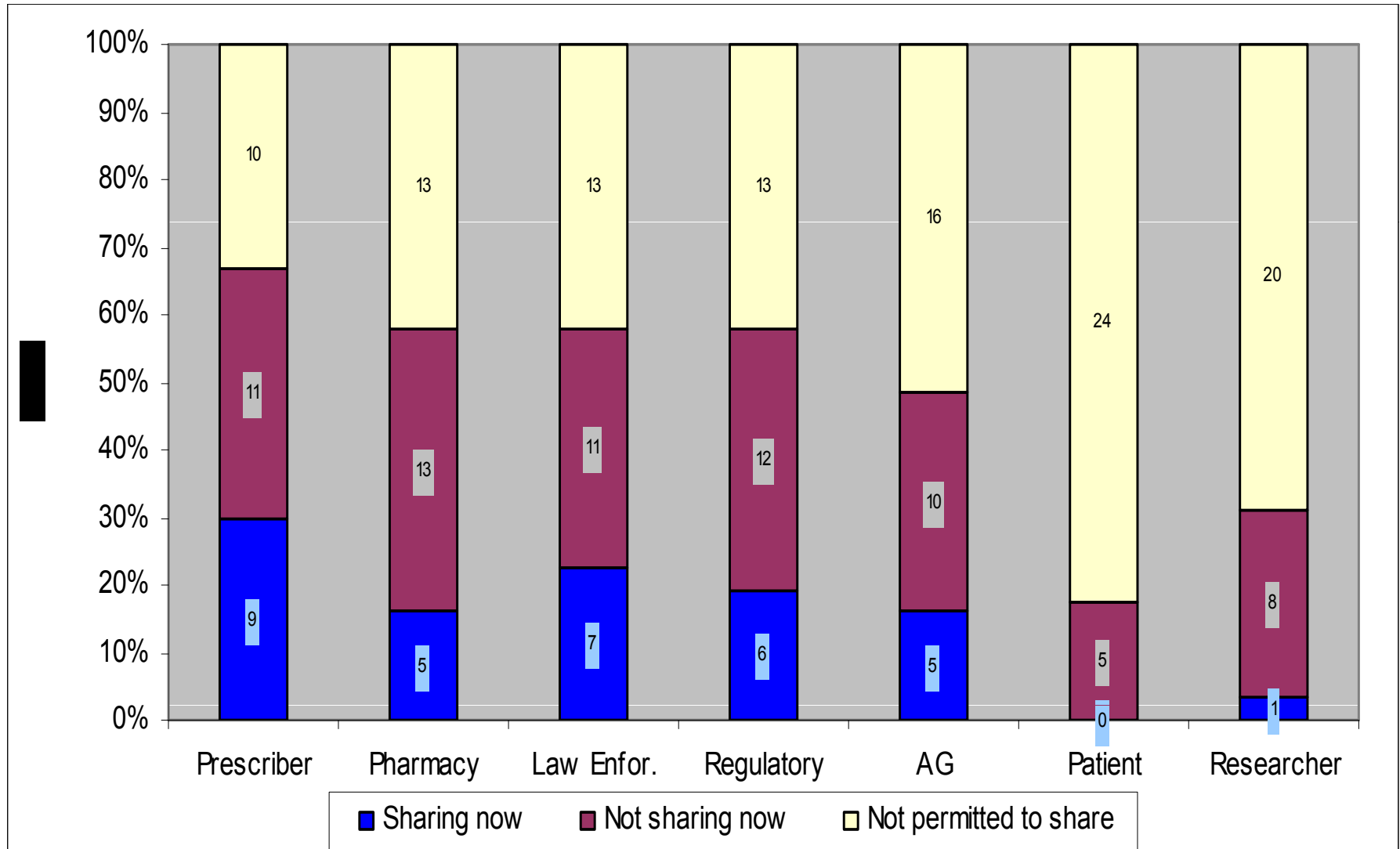
(IJIS Institute PMP Committee Survey 2007)



Intrastate Sharing Practices and Permission *

Unsolicited *

(IJIS Institute PMP Committee Survey 2007)



PDMP MODEL ACT

- When the Model Act was drafted, providing data to prescribers and pharmacists was new.
- Thus, the Model Act doesn't provide language regarding unsolicited reports to prescribers or pharmacists, only to law enforcement and regulatory agencies.
- Documents supporting the Model Act don't explain the importance of both solicited and unsolicited reports.

PDMP MODEL ACT

Many PDMPs claim to follow “Public Health” model.

- Public Health agencies do disease surveillance, collecting data from laboratories and clinicians -- like PDMPs collect Rx data.
- PH agencies provide requested information to practitioners and pharmacies -- like solicited reports.
- However, PH agencies proactively intervene when diseases appear:
 - Notify health care providers – like sending unsolicited reports
 - Inform all agencies, including law enforcement.
 - Do contact tracing,
 - Quarantine ill persons

PDMP MODEL ACT

- Many PDMPs cannot proactively intervene when data identifies probable illness, i.e. abuse and addiction to drugs.
- They are not following a “Public Health” model.

Specifically:

- CDC has identified an epidemic of deaths due to unintended drug poisoning (overdoses)
- Prescription opioids are a major factor.
- A high percentage of the deaths are for persons with a history of substance abuse. (Paulozzi Senate Testimony

March 2008)

PDMP MODEL ACT

- 5.2 million people admitted using pain relievers nonmedically in 2006 (NSDUH).
- 26,400 unintentional drug poisoning deaths in 2006 – **a rate of 8.8 per 100,000 population** in the US.
- At least half, 13,200 deaths are estimated to have involved prescription opioids.
- Conservatively, if we estimate only 10,000 involved opioids, the death rate among nonmedical pain reliever users was **192.3 per 100,000** or **22 times higher than for the general public.**

PDMP MODEL ACT

- PDMP data can identify persons who may be nonmedically using prescription opioids, (or obtaining opioids to sell to such persons).
- Persons nonmedically using have a very high risk of overdose and death.
- Public health responsibilities dictate that PDMPs proactively intervene – like any other epidemic.
- This requires, at minimum, state authority to send unsolicited reports and funds to analyze data and to distribute reports.

PDMP MODEL ACT

- The people dying now are different than during the previous (and smaller) heroin epidemics.
- More are white than African American.
- The death rates are just as high in rural areas, villages, small cities, and medium cities as in large central cities.
- More in their 40s die than in their 20s and 30s.
- If PDMPs don't proactively intervene, friends, neighbors, family members, and co-workers may die – when their lives might have been saved.

COMMITTEE TO REVISE PDMP MODEL ACT

- Adele Audet, MA
- Danna Droz, OH
- Dan Eccher, ME
- Kathy Ellis, CA
- Glen Kimura, HI
- Patrick Knue, TX
- John Eadie, Committee Chair
- Jim Giglio, Alliance Executive Director
- Steve Bruck, Security Consultant
- Rebecca Rose, BJA

COMMITTEE TO REVISE PDMP MODEL ACT

Issues - 1:

- Should the data elements list be updated: e.g. add source of payment?
- Should PDMPs require out-of-state pharmacies to submit data?
- Should PDMPs require in-state mail order pharmacies to report all prescriptions, regardless of state to which shipped?
- Should PDMPs have authority to share data in bulk, e.g. so a mail order pharmacy could submit Rx to PDMP where located; and that state send Rx to other PDMPs based on patient addresses.

COMMITTEE TO REVISE PDMP MODEL ACT

Issues - 2:

- How should authority to share data with other PMPs be established (to make PMIX data exchange possible)?
- How should authority to provide both solicited and unsolicited PDMP reports be established?
- What data security provisions should be included in the Model Act, if any?

STATE PROFILES

Why Review This Subject?

STATE PROFILES

- The public needs access to information about each PDMP.
- PDMPs need more detailed information about each other, and so do the Federal partners.
- Previously, profile information was kept on the NAMSDL website.
- The new PMP Alliance website is the logical location for this information.

STATE PROFILES

Phase I:

State profiles for public access on PMP Alliance website – Fall 2009

- Profile Template for public access developed.
- TTAC will populate as many data elements as possible to save time for PDMP administrators – enough surveys already.
- TTAC will forward partially filled-in profile to each PDMP to review, revise, and complete (Excel Document).

PDMP Profile	
Instructions:	
Large yellow boxes - fill in the requested info	
Small yellow boxes - put a number "1" in each appropriate box	
State/Territory/District:	Alabama
Name of Program:	Prescription Drug Monitoring Program
Acronym, if applicable (for example – "KASPER"):	
Website where PDMP information is available:	229
name of Agency responsible for management of PMP: (<i>Department of Justice, Bureau of Narcotic Enforcement, etc...</i>)	Alabama Department of Public Health
Agency Type (put a number "1" in the appropriate box):	
Pharmacy Board	<input type="checkbox"/>
Department of Health	<input checked="" type="checkbox"/>
Professional Licensing Agency	<input type="checkbox"/>
Law Enforcement Agency	<input type="checkbox"/>
Substance Abuse Agency	<input type="checkbox"/>
Consumer Protection Agency	<input type="checkbox"/>
Other (please specify)	
Contact:	
Name:	Charles C. Thomas, BPharm, R.Ph., FAPhA
Title:	State Pharmacy Director
Agency:	Alabama Dept of Public Health
Street Address:	201 Monroe Street Suite 1010 PO Box 303017
City, State, Zip Code:	Montgomery, AL 36130-3017
E-mail:	charliethomas@adph.state.al.us
Telephone:	334-206-5666
Fax:	334-206-5663
Cell:	334-202-0474 or 334-850-5283

State Population:	4,661,900
Number of Pharmacies within state (DEA registered or state CS registered):	
Number of practitioners authorized to prescribe controlled substances (DEA registered or state CS registered):	
Drugs/Schedules Monitored (put a number "1" in each appropriate box):	
II:	1
III:	1
IV:	1
V:	1
Other drugs, please list _____	
Number of prescription records collected in calendar year 2008:	
Note: if your state operates on a fiscal year basis, please provide:	
Number for the most recent fiscal year:	
Dates for most recent fiscal year:	_____, 2008 to _____, 2009
Frequency of data collection required by law (put a number "1" in the appropriate box):	
Once per month:	
Biweekly:	
Weekly:	1
Daily:	
Other (please specify)	
From which dispenser types do you collect data (put a number "1" in each appropriate box):	
Pharmacies:	1
Dispensing Practitioner:	1

Number of patient history reports produced in calendar year 2008:		
Note: if your state operates on a fiscal year basis, please provide:		
Number for the most recent fiscal year:		
Dates for most recent fiscal year:		_____, 2008 to _____, 2009
Who is authorized to request patient specific information? (put a number "1" in each appropriate box):		
Prescribers:	1	
Pharmacists	1	
Pharmacies		
Law enforcement:	1	
Licensing Boards:	1	
Patient (individual's own information)		
Other (please identify):		
Do state law/rules permit deidentified data to be provided to researchers? (put a number "1" if the answer is "yes"):		
Comments / Limitations		
Year when initial PMP authorizing legislation was signed into law:		2004
Year when PMP initially became operational:		2006
Citations - up to date as of 8/2009:		
Laws/Statute(s) citation(s):	2004 Alabama Legislature Act No. 2004-443	
Website where located:		
Regulation/Rule(s) citation(s):	Code of Alabama, 1975, § 20-2-210, et.seq,	
Website where located:		

STATE PROFILES

Phase II:

- Develop more detailed profiles for PDMPs and Federal partners.
- Spring 2010