

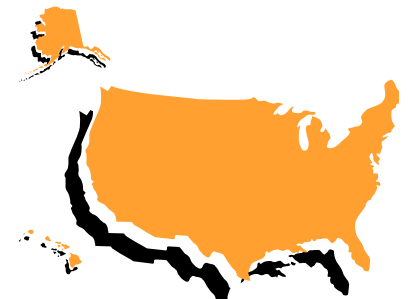
# **Prescription Monitoring Information Exchange**

**Alliance of States  
with  
Prescription Monitoring Programs  
*North Regional Meeting*  
June 2009**



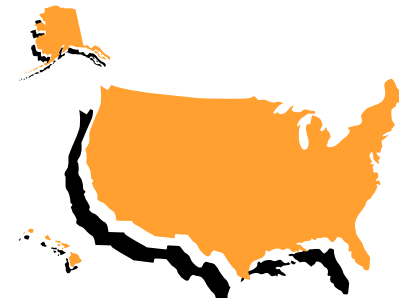
# Contents

- **The Need for Interstate Exchange of PMP Data**
- **The BJA/IJIS PMP Committee**
- **The Prescription Monitoring Information Exchange Project**
- **State Considerations and Planning**
- **Discussion/Q&A**



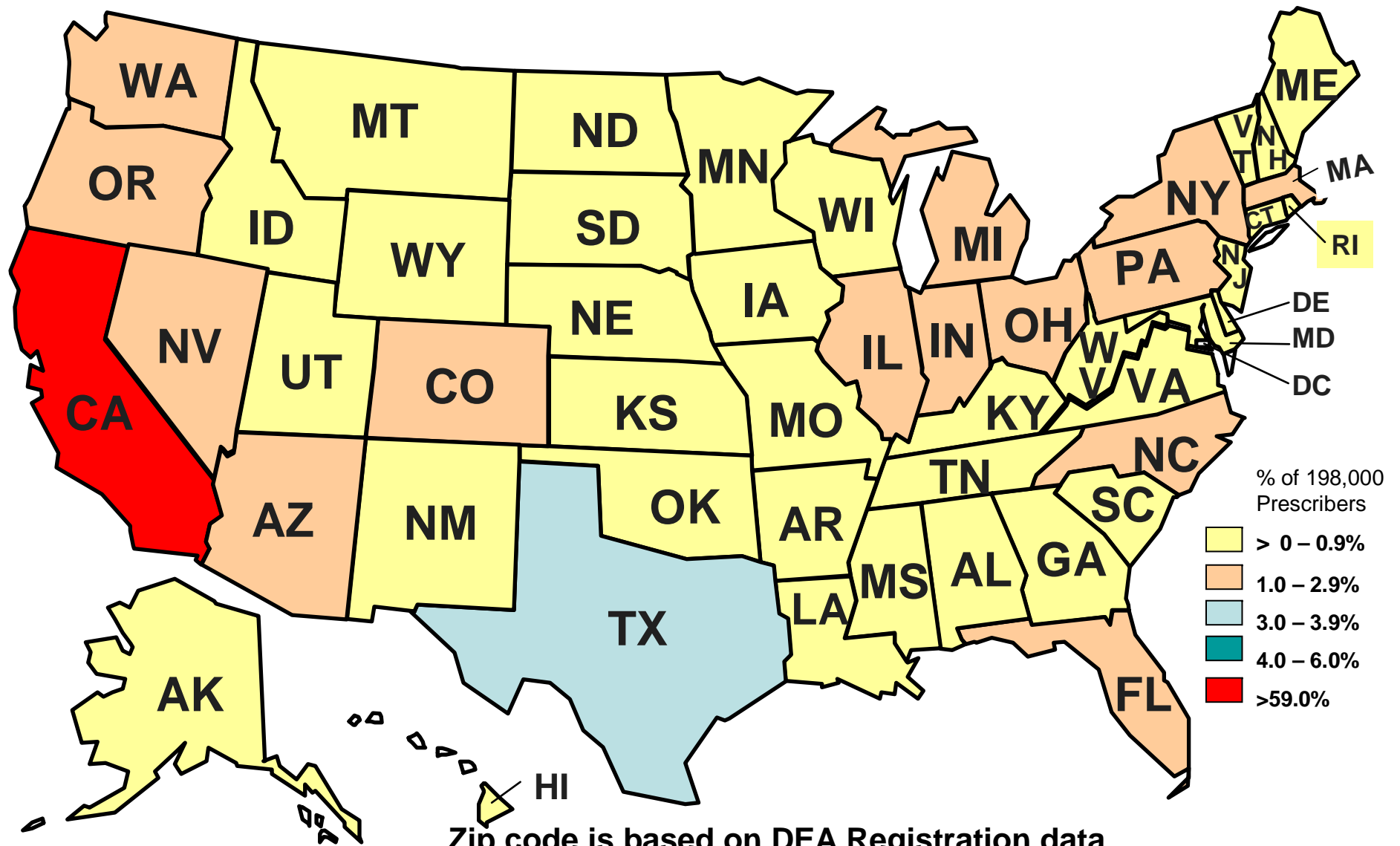
# The Need

- **Abusers/diverters not constrained by state borders**
- **Common requirement from PMP users is to see data from additional states**
- **Controlled substances dispensed within a state prescribed throughout the country**
- **Implement a national-level PMP data sharing solution with state-level control**



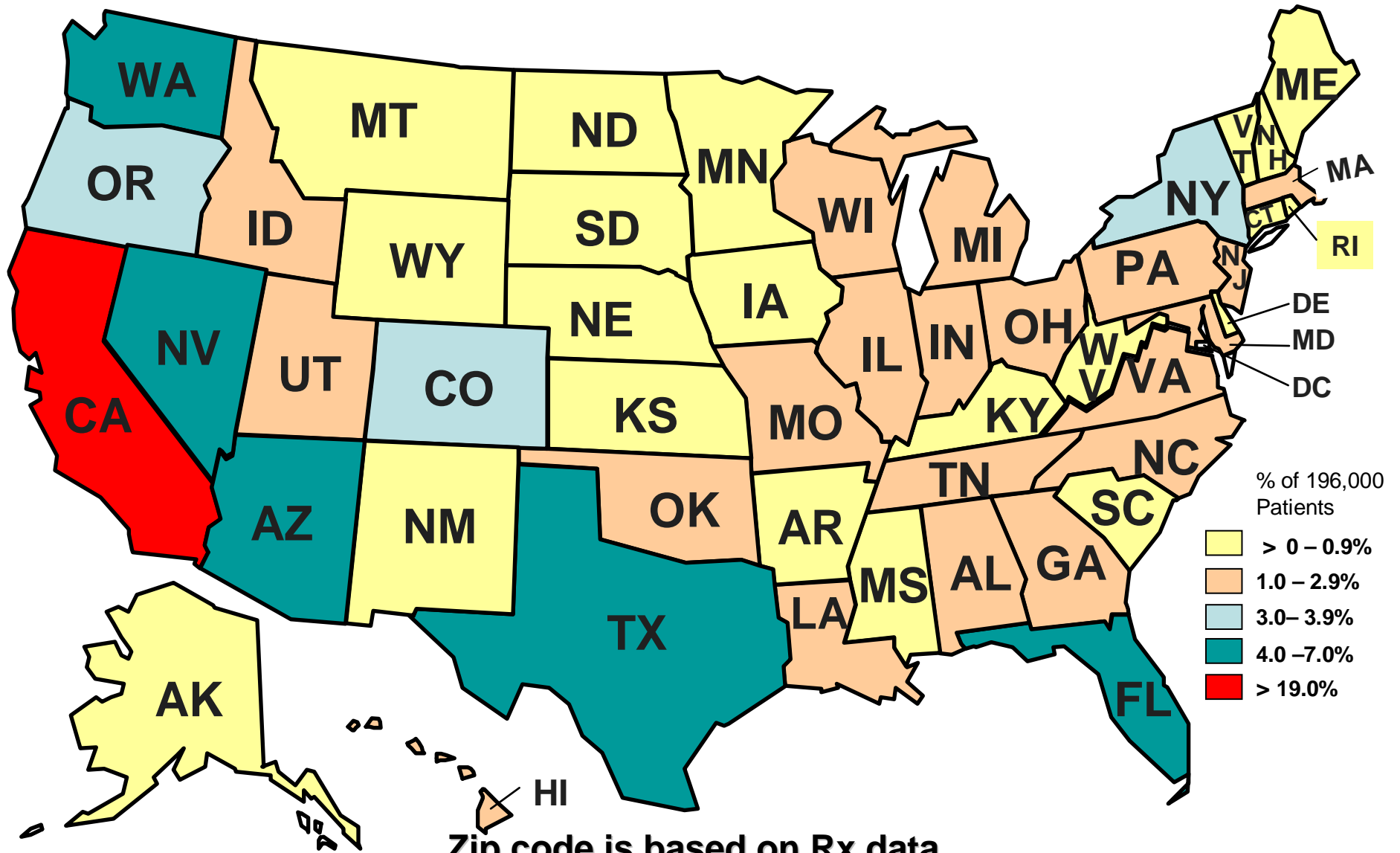
# Zip Code of Prescribers in CA PMP

2007 Data



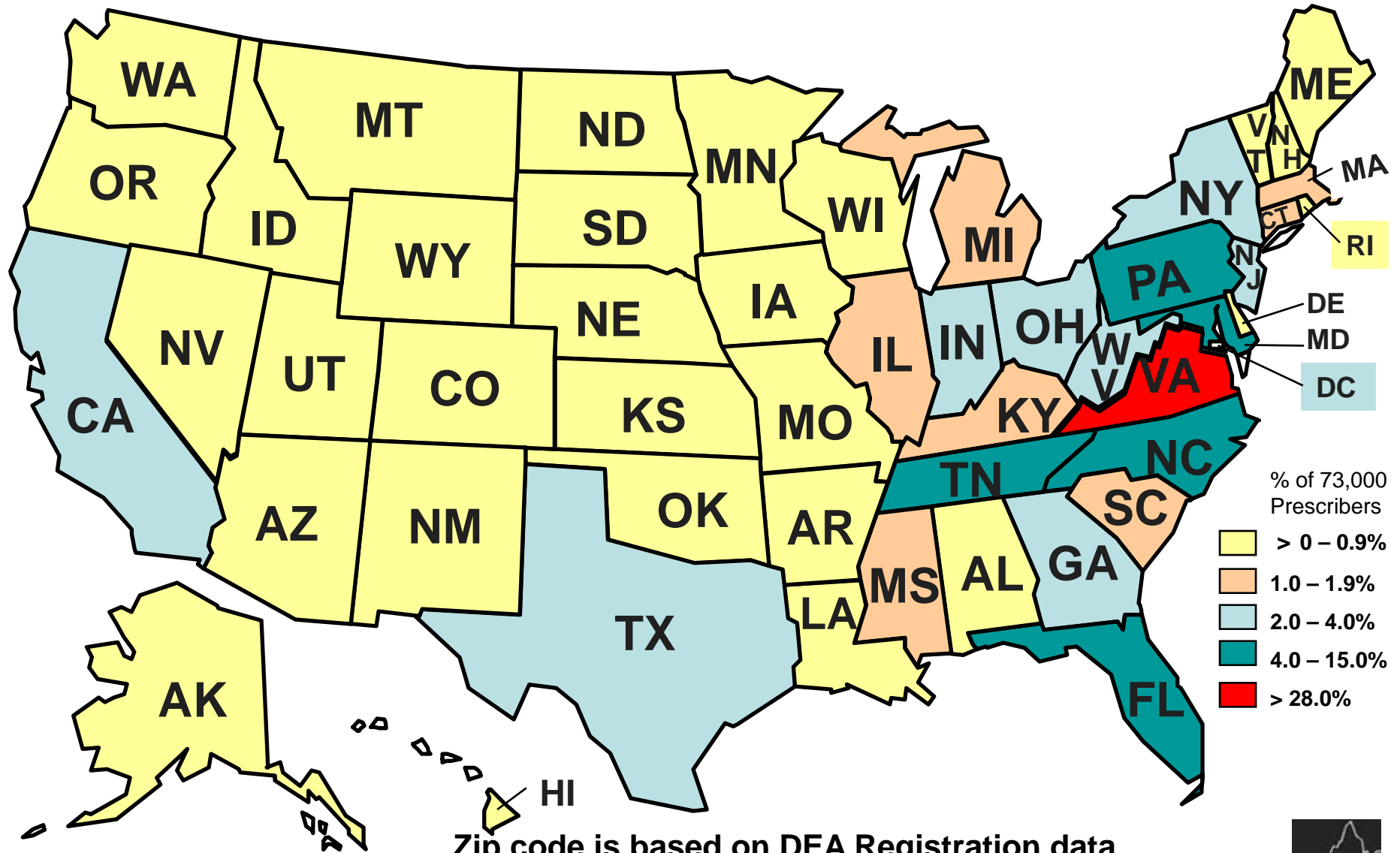
# Zip Code of Patients in CA PMP

2007 Data



# Zip Code of Prescribers in VA PMP

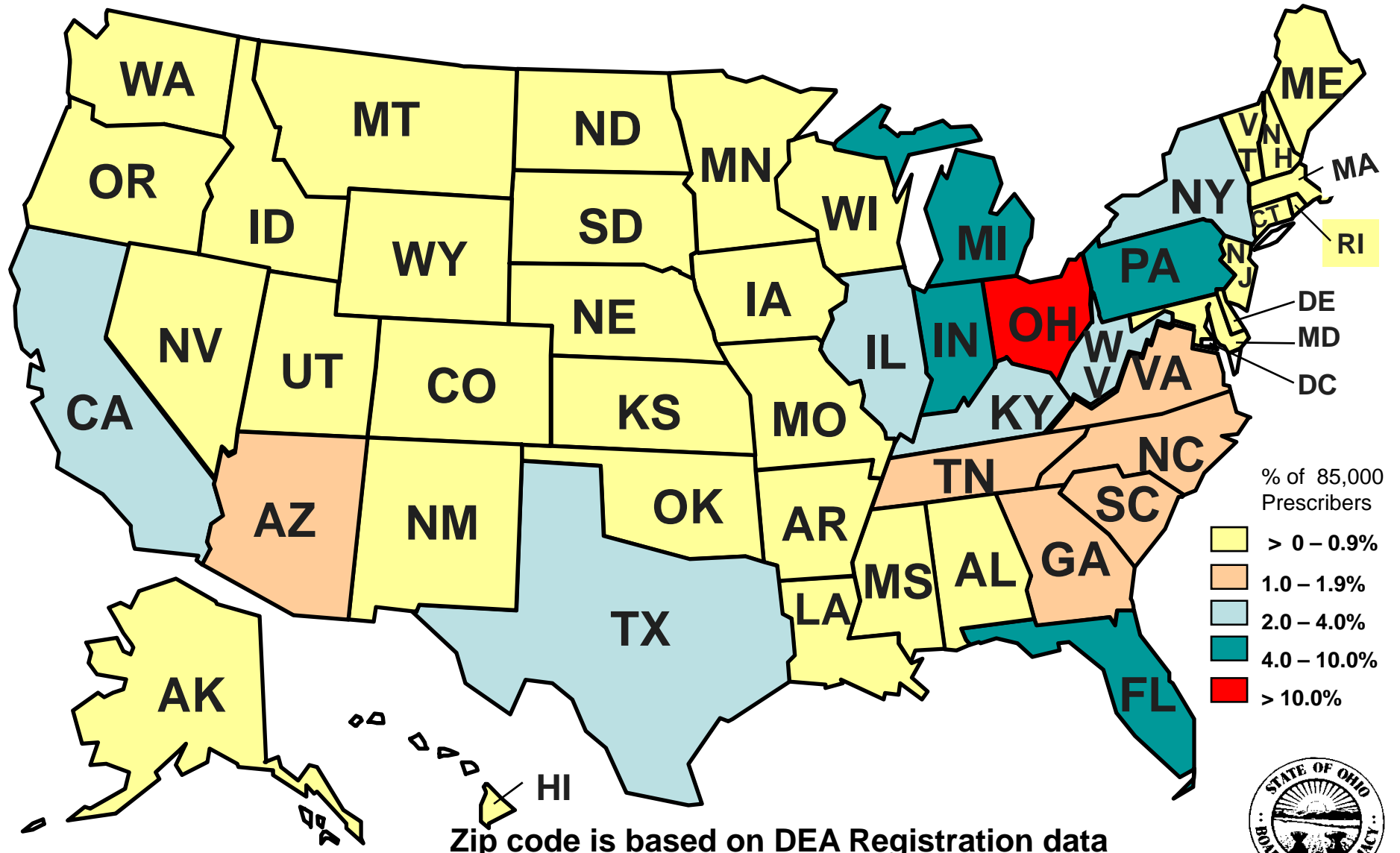
2007 Data





# Zip Code of Prescribers in Ohio PMP

## 2007 Data

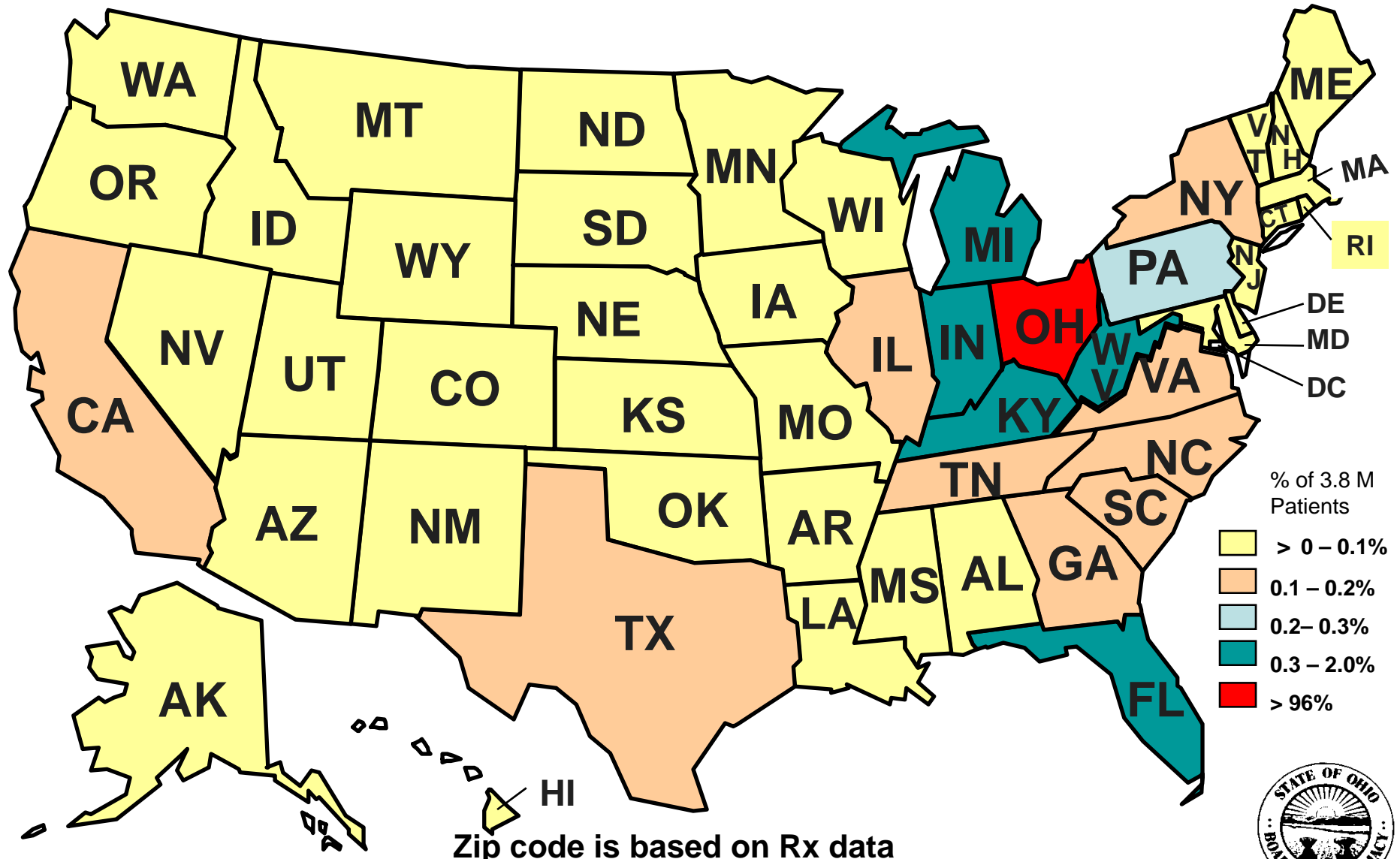


Zip code is based on DEA Registration data



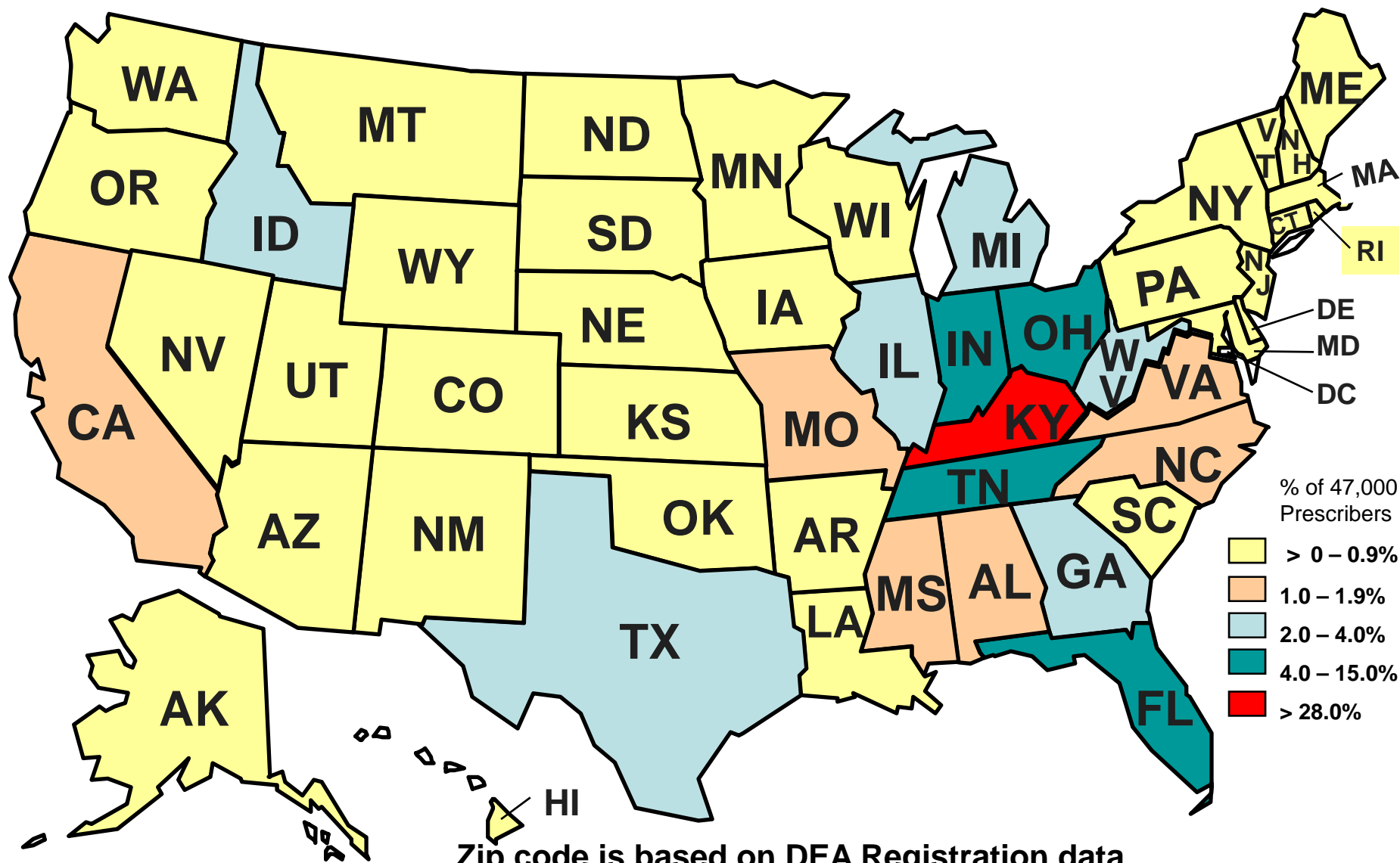
# Zip Code of Patients in Ohio PMP

## 2007 Data



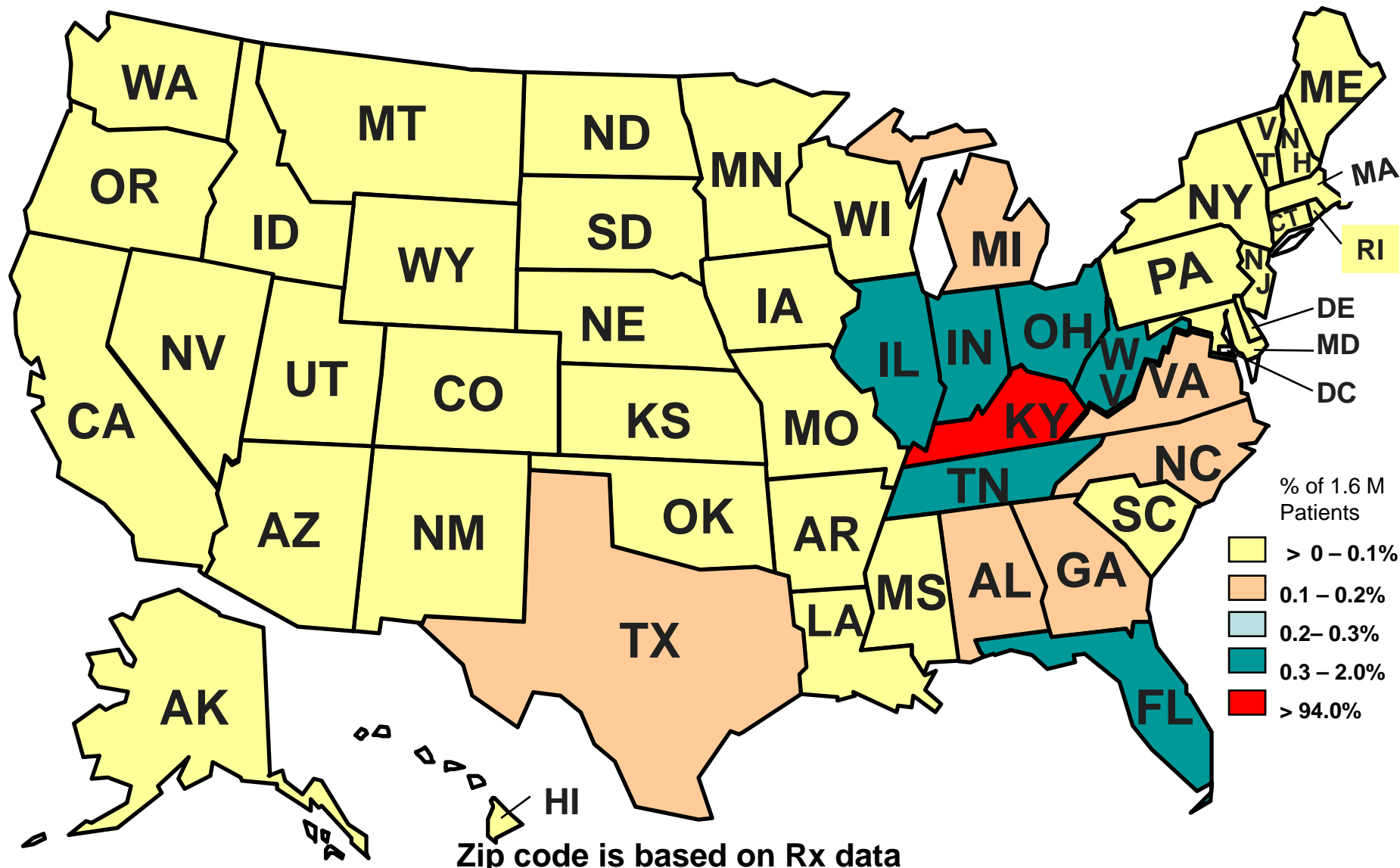
# Zip Code of Prescribers in KY PMP

## 2007 Data



# Zip Code of Patients in KY PMP

2007 Data



# **BJA/IJIS PMP Committee**

## **State Members**

- **Alabama**                      **Donna Jordan**
- **California**                      **Kathy Ellis**
- **Kentucky**                      **Dave Hopkins (Vice Chair)**
- **Massachusetts**                      **Adele Audet**
- **Nevada**                      **Joanee Quirk**
- **Ohio**                      **Danna Droz**
- **Oklahoma**                      **David Hale**



# **BJA/IJIS PMP Committee**

## **Industry Members**

- **Steve Bruck** **BruckEdwards, Inc. (Chair)**
- **Donald Burt Jr., MD** **PatientKeeper, Inc.**
- **Henry Camp** **Medical Systems Dev. Corp.**
- **John Eadie** **Eadie Consulting**
- **Diane Lacy** **Vortx, Inc.**
- **Bill Mohlenbrock, MD** **Crossflo Systems, Inc.**



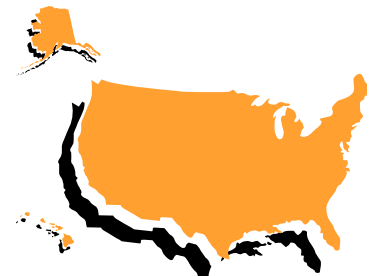
# **BJA/IJIS PMP Committee**

## **Federal Advisors**

- **Mandy Lord**                      **DEA**
- **Chris Traver**                      **BJA**

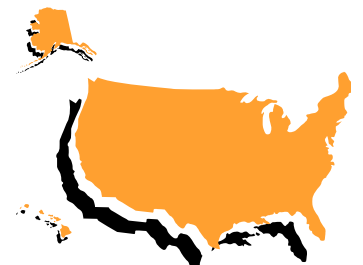
## **Project Managers**

- **Scott Serich**                      **IJIS Institute**
- **Sam Ali**                              **IJIS Institute**



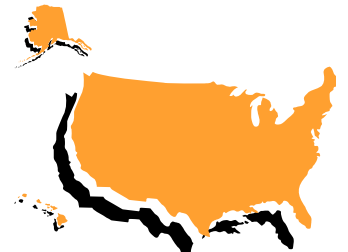
# BJA/IJIS PMIX Phase II

- **Successfully demonstrated a pilot point-to-point exchange of PMP information between California and Nevada on May 31, 2007**
- **Created a set of reference documents describing a standard data model for the exchange**



# BJA/IJIS PMIX Phase III – Goals

- Demonstrate a prototype exchange of PMP information among 3 exchange partner states using intermediate PMIX Hub Server
  - Ohio (exchange partner and Hub Server host)
  - Kentucky, others? (exchange partners)
- Create a set of reference documents to assist states with design and implementation (based on the National Information Exchange Model)
- Develop a cost model for implementation, operation and maintenance of a sustained, production-level Hub
- Target completion March 31, 2009 or ASAP



# **BJA/IJIS PMIX Phase III - Status**

- **Phase III initiated May 2007**
- **Information Exchange Package Document (IEPD) for exchange model completed**
- **Initial definition of Hub Server specifications completed**
- **Hub Server procured and installed at Ohio BOP**
- **Test of simulated request and response through Hub completed June 13, 2008**



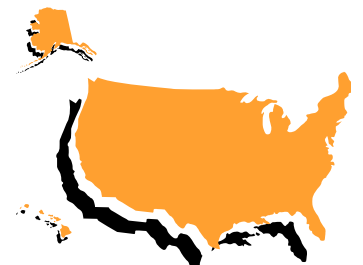
# **BJA/IJIS PMIX Phase III - Status**

- **MOU for exchange of test data in place between Ohio and Kentucky (only two states will exchange initially)**
- **Planned completion revised to April 30 based upon problems identified during testing**
- **Interface Control Document will be simplified (draft version available)**
- **Pilot state PMP testing efforts underway**



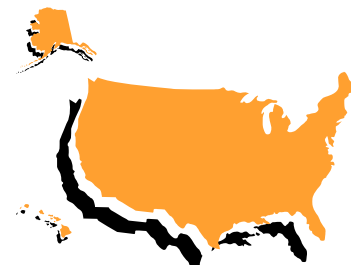
# BJA/IJIS PMIX Phase III - Solution Components

- **Web services capability**
- **Basic Hub **Server** functionality**
  - **Test data only**
  - **Patient reports only**
  - **One requestor type only (physician)**



# BJA/IJIS PMIX Phase III - Solution Components

- **Basic Hub Server **administration** functionality**
  - **Minimal state administrator capability for demo purposes**
- **One level of network security (request and response transmission encryption only)**



# BJA/IJIS PMIX

## Project Design Considerations

- **Access via Web Services (Internet)**
- **No state PMP PHI data will be stored at the Hub**
- **All state PMP PHI data will remain encrypted while passing through the Hub**
- **Future expansion (bulk data transfer, etc.)**



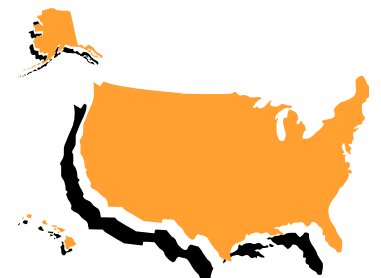
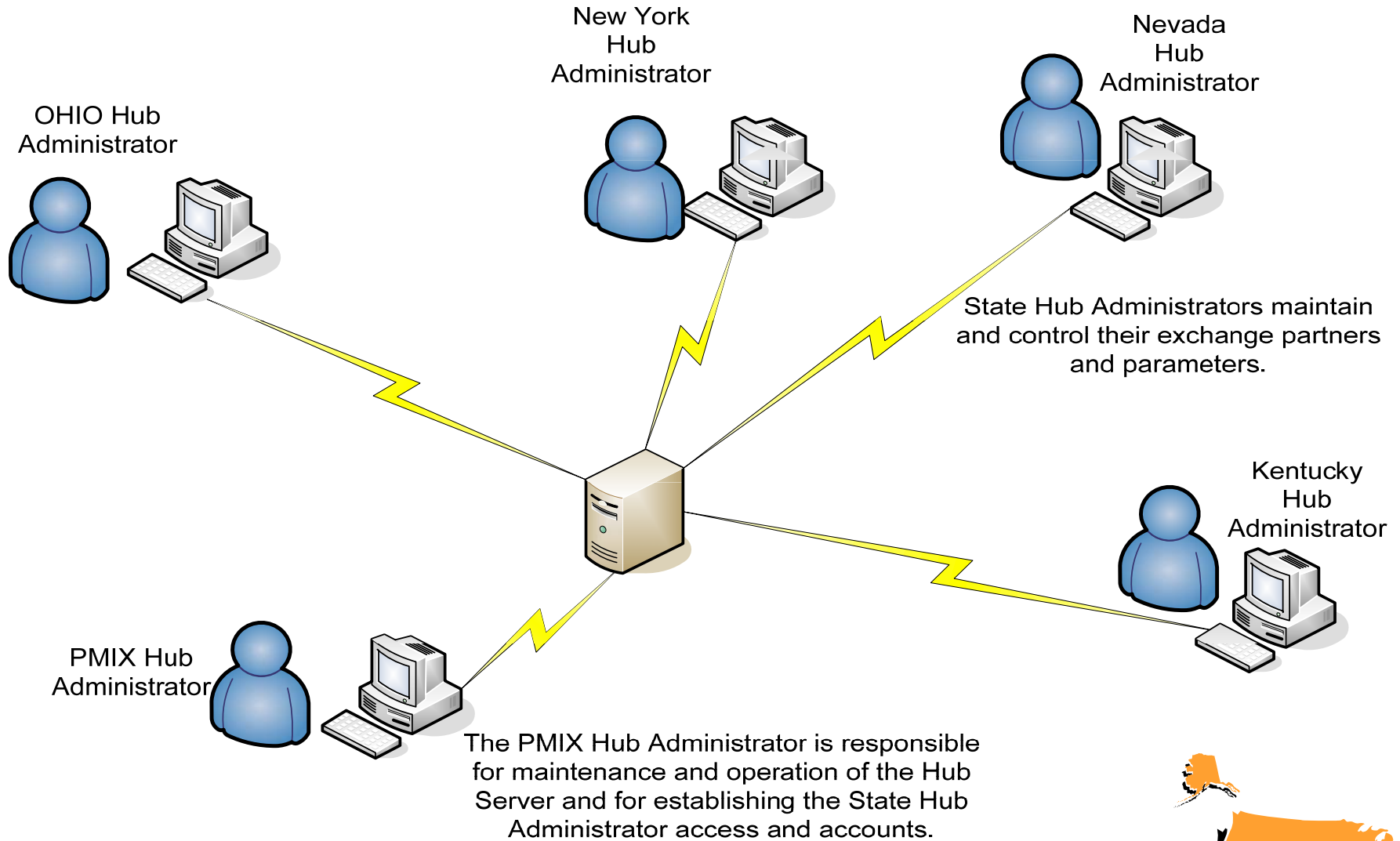
# BJA/IJIS PMIX

## Project Design Considerations

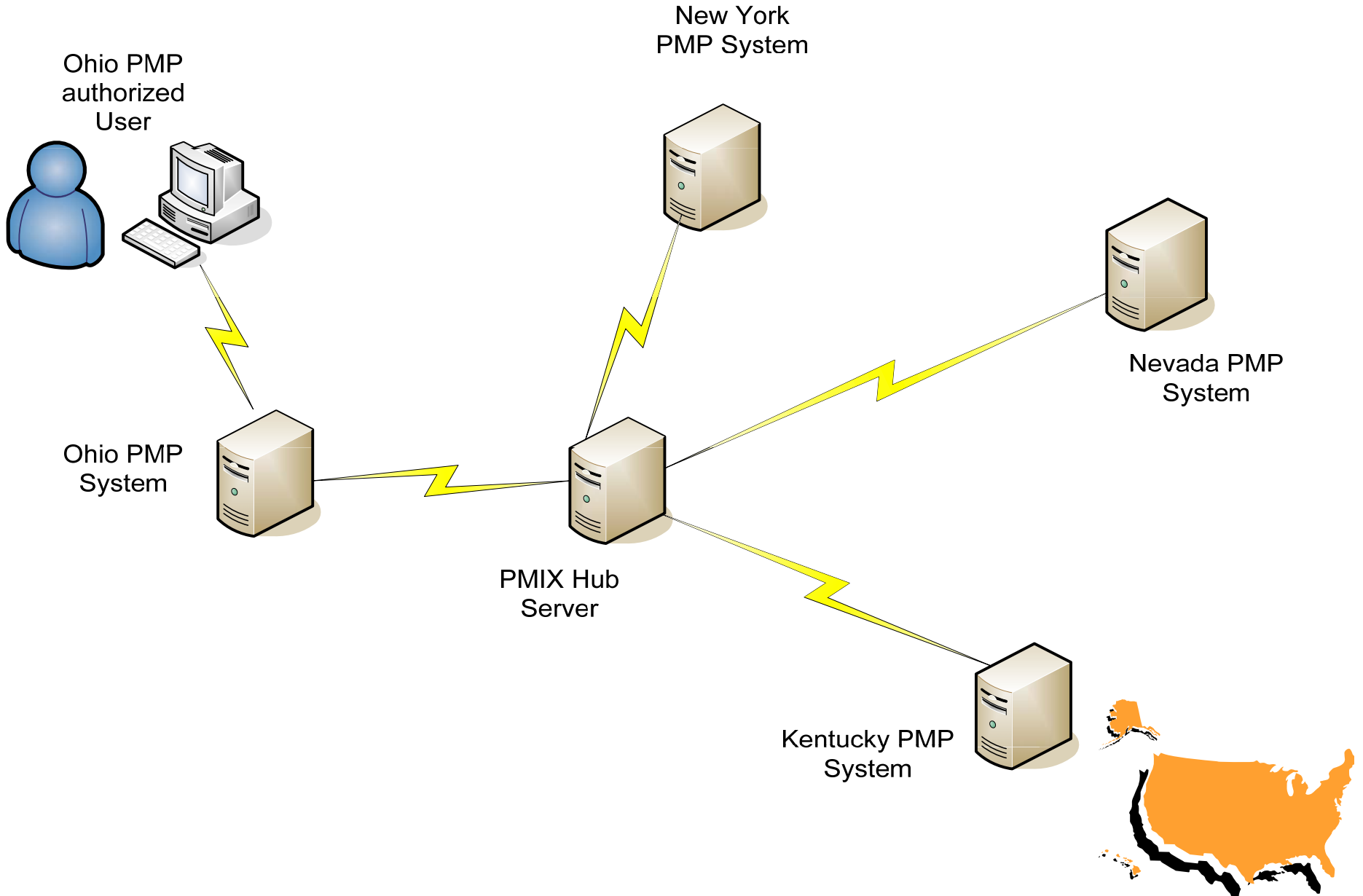
- **Each state will control their exchange parameters**
  - **Exchange state partners**
  - **Allowable exchange entities (e.g.; prescriber types, law enforcement, etc.)**
  - **Report format (e.g.; allow records to be sorted in with other states; or presented as stand-alone report)**



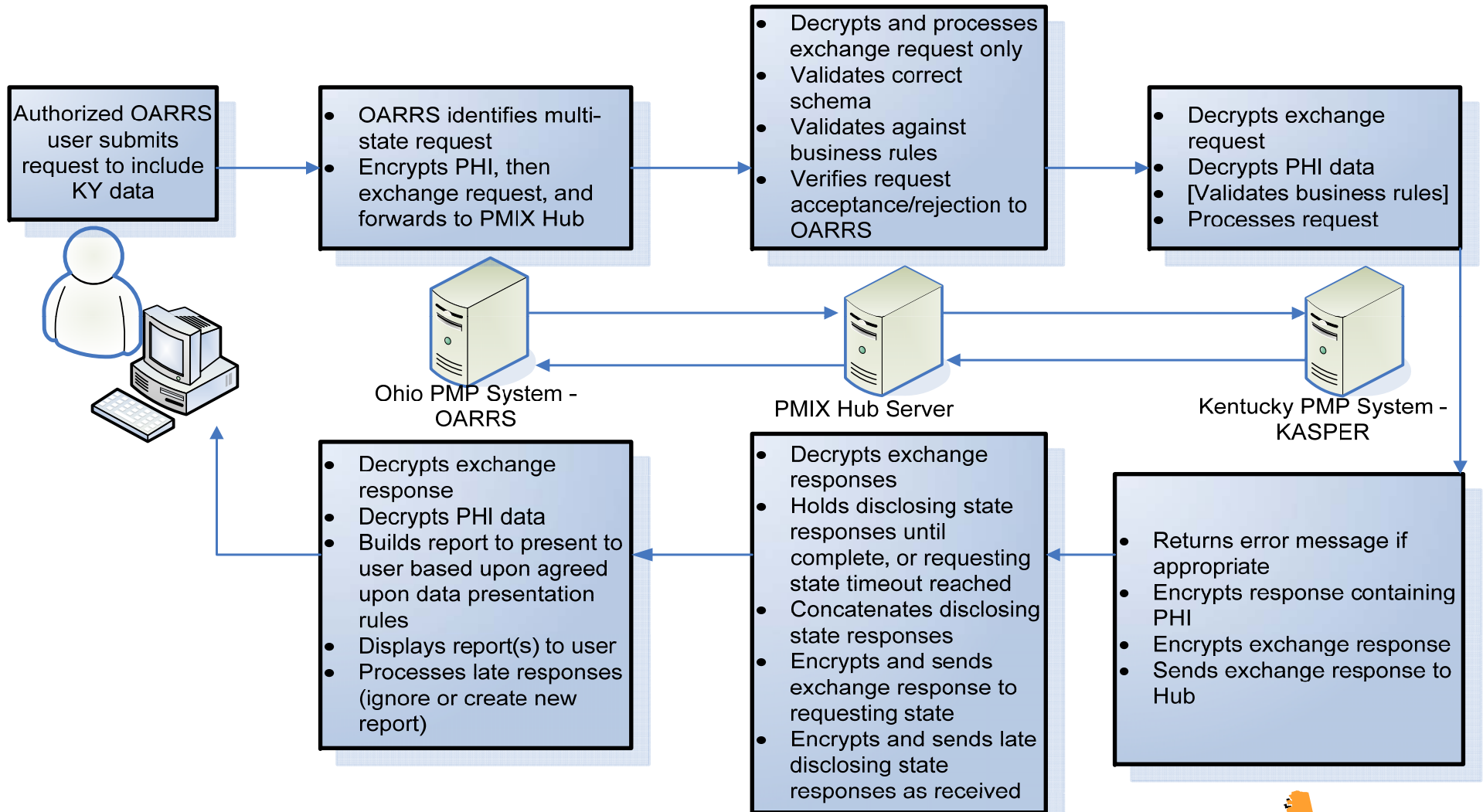
# Hub Administration



# Hub Exchanges



# Hub Exchanges – Example



# Technical Considerations for States

- **Graphical user interface to your PMP**
  - **Authenticated users only**
  - **Allow selection of states for requesting data**
- **Internal system logic to create requests to Hub and to process responses from Hub**
  - **Including displaying multi-state data to end user**



# Technical Considerations for States, cont.

- **Web services** to control Internet access between PMP and Hub
- **Security; two levels of encryption**
  - Request/response message encryption
  - PHI data/report encryption



# **Business Considerations for States**

- **Review/update state statutes/regulations to allow for PMP information exchange**
- **Document “demand” to help justify PMIX participation to legislators and state officials**
- **Review cost model and PMIX reference documents to support development and operational cost estimates**



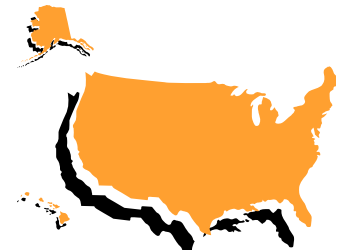
# **Business Considerations for States, cont.**

- **Plan for Memorandums of Understanding**
  - **Sharing test data (if needed)**
  - **Sharing actual data**
  - **Utilizing the PMIX Hub**
- **Utilize BJA Grants to support participation.**



# Legal Considerations for States

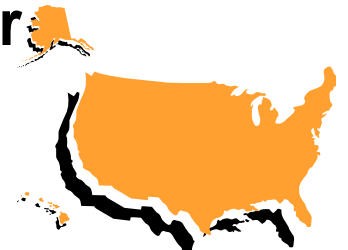
- **HIPAA**
  - Understand exemptions/permitted disclosures
  - Notification of breach (which state responsible?)
  - Tracking disclosures
- **Privacy and security safeguards**
- **Authorization/Authentication of users**
  - Defined for each state
  - Acceptance of requesting state process.



# **Legal Considerations for States Cont.**

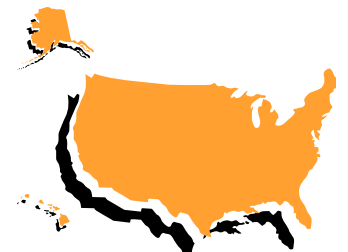
- **List of data elements to be exchanged**
- **Usage and disclosure of data**
  - **Enforcement of penalties for improper use of data**
- **Retention of data (reports)**
- **Addressing state PMP policy or process changes**

**ASPMP – Plan to develop a baseline MOU to provide recommended “standard” terms and conditions; that will allow for state partners to include unique terms or conditions.**



# Cost Model

- **Designed to assist states with planning and budgeting hardware, software and staff support costs for PMIX participation:**
  - **Costs associated with modifying the state PMP to interface with the Hub**
  - **Costs associated with operating and maintaining the state PMP to Hub interface**
  - **Costs associated with operating and maintaining the PMIX Hub**



# Cost Model

- **Assumes participating states will support PMIX Hub costs**
- **Based upon BJA/IJIS PMP Committee state information:**
  - **Analysis of practitioner PMP report usage volumes**
  - **Estimates of state PMP and PMIX Hub staff support requirements**
- **In final review by BJA**



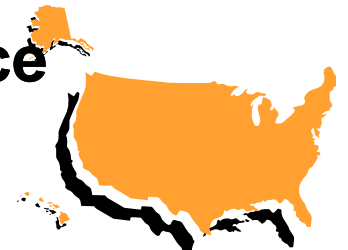
# Cost Model - Recommendation

- **Establish participating state annual base fee**
  - **E.g.; \$10,000 or \$20,000 per state**
  - **Base fee would decline as more states participate**
- **Establish annual “usage fee” based on number of practitioners within each state**
  - **Should align more closely with actual usage than measures such as population**
  - **Provides cost predictability**



# PMIX Governance

- Anticipated that a “governing body” will be created to provide oversight of the PMIX Hub
- Responsibilities
  - Contracting for PMIX Hub operation, maintenance and support.
  - Establishing a fee schedule and procedures for charging PMIX participants and funding PMIX Hub operation
  - Maintaining MOUs/agreements between governing body and individual states
  - Maintaining security policies and ensuring appropriate audits
  - Maintaining legal and regulatory compliance



# Would you like to participate?

- **We are maintaining a list of states interested in testing an interface to the Hub**
  - **Identify interest and readiness**
  - **No firm commitment required**
- **Contact**
  - **Dave Hopkins (Dave.Hopkins@ky.gov)**
  - **Scott Serich (Scott.Serich@ijis.org)**

