**Interim Policy**

**Allowable Uses for Harold Rogers Prescription Drug Monitoring Program Grant Funds**

**March 21, 2012**

Under BJA's previous policy, Harold Rogers Prescription Drug Monitoring Program grant funding could only be used in support of interstate data sharing via the RxCheck hub (formerly referred to as the PMIX hub). However, in an attempt to expedite and maximize data sharing between states, BJA has adopted an interim policy allowing for HRPDMP grant funding to be used by states adopting alternative hub solutions that are in conformance with the Prescription Monitoring Information Exchange (PMIX) Architecture.

HRPDMP funding leverages the significant national investment in PDMP interoperability, taking advantage of consensus-driven solutions recommended by the PMIX working group which includes state PDMP administrators, national partners, and private industry stakeholders. The RxCheck hub, designed to be a reference implementation of the PMIX specifications, remains the only hub solution that is confirmed to fully meet all of the specifications and guidelines of the PMIX working group. But recent progress towards the formal establishment of a national PMIX Architecture that builds on the existing PMIX specifications has resulted in the need to update this policy in order to support states in pursuing interstate data sharing capabilities.

Development of the PMIX Architecture is being managed through a governance process led by the Alliance of States with Prescription Monitoring Programs (ASPMP). However, the final vote to adopt the Architecture by ASPMP membership has been delayed until at least June, 2012. BJA feels strongly that such a delay should not hinder the ability of states to move forward with interstate data sharing. Therefore, BJA has adopted an interim policy that requires conformance to the PMIX Architecture in its current form, as agreed upon by the ASPMP technical working group. The current Architecture includes two related but distinct conformance targets: (1) the PMIX Hub-to-Hub Specification which governs the flow of PDMP information across hub solutions, and (2) the PMIX State-to-Hub Specification which governs the interface by which a state shares PDMP data to/from a hub, directly with another state, or with any other exchange partner. States receiving HRPDMP funds (or by proxy, their hub provider) are required to meet conformance target #1 in order to enable BJA's baseline goal of a nationwide PMIX capability. At this point in time BJA strongly recommends (but does not require) that all states meet conformance target #2 in order to promote adoption of a common state interface, thereby enabling standardization, agility, and flexibility in future PDMP information sharing activities.

The Architecture includes both core PMIX Specifications in order to, among other purposes, ensure adequate standards are established to enable end-to-end information sharing that preserves and protects all Personally Identifiable Information (PII) and Protected Health Information (PHI) data. While this goal is still possible without universal adoption of the State-to-Hub Specification, usage of a nonstandard state interface does introduce potential complexity and additional cost to the exchange by requiring message translation, additional security encryption schemes, and/or modification to the interface to accommodate future state information sharing requirements. Additionally, the State-to-

Hub Specification represents the culmination of years of work on the part of the PMIX Working Group and developed through consensus of state PDMP's, Federal agencies, and private industry partners. Therefore BJA requests that states opting not to meet conformance target #2 provide written justification for an alternative approach as part of their funding application or, in the case of an existing award, to the BJA Policy Advisor.

Upon consideration by the ASPMP community of the PMIX Architecture and associated conformance rules, BJA may again revisit this policy to ensure that all states remain well positioned to fully participate in a national interstate sharing solution.

This policy applies to all current and future HRPDMP grant recipients.  Grantees that have questions regarding this new policy should contact BJA Policy Advisor Danica Szarvas-Kidd at (202) 305-7418.  For more information about the PMIX Architecture, including the current PMIX specifications, please see the Alliance of States with Prescription Monitoring Programs' website at http://www.pmpalliance.org/content/prescription-monitoring-information-exchange-pmix.