

NABP PMP InterConnect

Developed by the National Association of Boards of Pharmacy[®] (NABP[®]), the NABP PMP InterConnectSM was created by the Association to protect public health. Founded in 1904, NABP is the impartial non-profit organization that supports the state boards of pharmacy in protecting public health. NABP aims to ensure the public's health and safety through its many programs, which range from pharmacist competency assessment programs to pharmacist license transfer to accreditation programs for Internet pharmacies and wholesale distributors. For more details on NABP and how it assists the state boards of pharmacy through its programs, please see page 5.

Overview of the NABP PMP InterConnect

Background on NABP Involvement

Recognizing NABP's background in assisting boards of pharmacy and other regulators in protecting the public health, NABP was approached by several prescription monitoring program (PMP) administrators in the fall of 2010 about building a low cost, easy to implement, and highly enhanced solution for interstate data sharing that could be implemented in under a year.

NABP PMP InterConnect Design and Intent

At its core, the NABP InterConnect was designed to facilitate interoperability and interstate data sharing between PMPs.

Under the direction of a group of nationally representative PMP administrators, development of the NABP InterConnect began in January 2011. The administrators made several specific requests of the NABP InterConnect design and function:

- Utilize the messaging specification that was an outgrowth of the Bureau of Justice Assistance efforts with Prescription Monitoring Information Exchange (PMIX), which would allow for seamless communication of program information between PMP programs;
- Encrypt the requests and responses from PMP to PMP using highly secure, widely-deployed encryption technologies, ensuring no Protected Health Information or Personally Identifiable Information is exposed to any entity other than the disclosing and requesting PMPs;
- The NABP InterConnect should be:
 - Built using open standards
 - Cost effective
 - Easy to implement
 - Low maintenance
- The NABP InterConnect should include a rules engine that would allow PMPs to maintain complete control and autonomy over PMP data exchanges with other states participating in NABP InterConnect.

This group of PMP administrators also asked for a simplified process of participating in the InterConnect without having to draft and sign complex memorandums of understanding (MOUs) with every other participating state to ensure that each state's access rules would be respected and enforced. Through the MOU, each state agrees to participate in the program and investigate reports of unauthorized disclosures of any information obtained by one of its users from another state, and NABP takes on the responsibility for ensuring that the state's access rules are enforced via the rules engine. This rules engine, coupled with the single MOU, provides a highly effective and efficient pathway for interstate data sharing.

The NABP InterConnect, which launched for nationwide use on July 27, 2011, has effectively met and in many cases exceeded each of the criteria and expectations set by the PMP administrators.

Governance of NABP PMP InterConnect

The NABP InterConnect is governed by a Steering Committee, comprised exclusively of representatives of the PMPs that are participating in the system. The Steering Committee serves as the governing and advisory body as it relates to the administration and function of the NABP InterConnect. No outside organization, public or private, has access to the NABP InterConnect, a vote about, influence over, or the ability to direct the administration and function of the NABP InterConnect. Outside parties and subject matter experts may, however, be asked to provide information for the Steering Committee's consideration from time to time.

Steering Committee Structure/Function

Currently, there are 13 members on the Steering Committee: Arizona, Connecticut, Indiana, Kansas, Michigan, Mississippi, New Mexico, North Dakota, Ohio, South Carolina, Utah, Virginia (chair), and West Virginia. Additional members will join as they agree to participate and execute the MOU with NABP.

At the Steering Committee meeting held on August 30-31, 2011, the Steering Committee unanimously adopted "Operating Principals" that will govern the activities and interactions of the committee.

Within those operating principals, the committee dictated the following:

- There shall be a chairperson of the committee, to be appointed annually by the NABP president.
- Voting (active) members of the committee shall be composed of those states that have executed an MOU with NABP for participation in NABP InterConnect.
- The committee, through the chairperson, may invite other states to participate in the Steering Committee as guests. The committee, through the chairperson, may invite other guests to participate, attend or observe the Steering Committee meetings. Such individuals may include the technology solution provider for NABP InterConnect; NABP software vendors; relevant federal or state agencies or national associations dedicated to patient safety, safe drug use, and deterring diversion of controlled substances; or any other person as determined by the discretion of the chairperson.

The First 200 Days: NABP PMP InterConnect by the Numbers

- In the first 200 days since launch, the NABP PMP InterConnect has processed 158,562 requests between Connecticut, Indiana, Michigan, Ohio, and Virginia.
- The average hub response/processing time for those requests: 1.73 seconds
- The average PMP response time for those requests: 5.74 seconds
- In total, using NABP InterConnect, authorized users of the PMPs only waited an average of 7.5 seconds for a consolidated multi-state PMP report.

- The chairperson will appoint a dispute resolution committee to mediate any disputes between states participating in the NABP PMP InterConnect. The dispute resolution committee shall be composed of three members from states not involved in the dispute, and the committee will be representative of the different types of agencies, eg, law enforcement, health agency, or board of pharmacy, where possible.
- All formal recommendations of the Steering Committee that comprise a significant policy or technical change to the NABP InterConnect, or would otherwise have a fiscal impact on NABP must be ratified by the NABP Executive Committee.
 - This arrangement is consistent with how all NABP committees and task forces are managed and administered. Further, the NABP executive director/secretary and Executive Committee are responsible for ensuring that all actions of such committees are congruent with the NABP Constitution and Bylaws of NABP, are consistent with the actions of other committees, adhere to state and federal laws and regulations applicable to not-for-profit associations, and adhere to the principals set forth by NABP regarding advancing public health initiatives.

NABP PMP InterConnect Development and Implementation Time Line

January 2011

NABP and Appriss Inc begin development of NABP InterConnect after consulting with PMP administrators who helped set the business requirements and functional specification for the NABP InterConnect.

March 2011

NABP holds an initial Steering Committee meeting of PMP administrators that also included outside participants, such as the Bureau of Justice Assistance, Drug Enforcement Administration, the Alliance of States with Prescription Monitoring Programs, the IJIS Institute, and members of industry.

May 2011

Development of NABP InterConnect is completed and NABP begins to work with state PMP software vendors to develop the appropriate interface for NABP InterConnect

July 27, 2011

NABP InterConnect launches for nationwide use.

August 4, 2011

Users of the Indiana’s INSPECT program and the Ohio Automated Rx Reporting System (OARRS) program perform the first successful state-to-state data exchange in a live environment.

August 16, 2011

Ohio authorizes statewide access for prescriber and pharmacist users of the OARRS program for Indiana data using NABP InterConnect.

August 18, 2011

NABP, Appriss, and representatives from the Mississippi and Ohio PMPs participate in PMIX architecture meetings sponsored by the Alliance of States with Prescription Monitoring Programs. The purpose of the meeting was to develop a PMIX architecture that would provide a framework for sharing data between multiple interstate sharing “hubs.”

August 22, 2011

Virginia PMP goes live on NABP InterConnect.

August 30-31, 2011

Steering Committee meeting held to:

- Finalize governance structure;
- Discuss bringing additional PMPs onboard in 2011;
- Solicit guidance and feedback about administrative matters;
- Approve certain functionality enhancements recommended for NABP InterConnect; and
- Strategize about ways to make PMP program information more useful in medical decision-making involving medication therapy.

On an ongoing basis, NABP has been engaged in discussions with the Bureau of Justice Assistance and the Office of National Drug Control Policy relative to its efforts in this area, and looks forward to continued collaboration and dialogue on this important project.

The Steering Committee shall meet, either in person, or via teleconference, at least once annually, and additionally at the discretion of the chairperson, or as requested by a simple majority of the members of the Steering Committee.

Adoption of NABP PMP InterConnect

As of February 2012, 13 states have executed a MOU with NABP to participate in the NABP InterConnect: Arizona, Connecticut, Indiana, Kansas, Michigan, Mississippi, New Mexico, North Dakota, Ohio, South Carolina, Utah, Virginia, and West Virginia.

The following PMPs intend to sign on to use NABP InterConnect and have MOUs under review: Delaware, Louisiana, Montana, Nevada, North Carolina, Rhode Island, and South Dakota.

It is anticipated that approximately 20 states will be sharing data using NABP InterConnect in 2012.

Cost/Funding

Funding for Implementation and Participation

NABP is paying for all costs associated with the development and implementation of the NABP InterConnect, as well as five years of annual participation fees for each participating PMP using, exclusively, its own revenues derived from program resources described previously in this document and its reserves. NABP has the financial resources to make this commitment without the need to use any outside funding sources.

NABP received an unrestricted educational grant from Purdue Pharma L.P. in the amount of one million dollars. Although not restricted by Purdue in any way, the NABP Foundation® has determined that this grant will not be used for any costs associated with the development, implementation, or ongoing operational costs of the NABP InterConnect. This grant will be administered through the NABP Foundation which is a separate non-profit organization. Funds held by the NABP Foundation are used for special educational or public safety projects that are separate from and outside NABP’s core programs and activities. Additionally, no grantor has any access to, influence, decision-making authority, or consideration relative to the NABP InterConnect and its administration and functions. As described above, the governance and administrative guidance for the NABP InterConnect is in the hands of the Steering Committee.

The NABP Foundation is making the Purdue unrestricted grant funds available to any state that needs and requests financial assistance to modify its PMP software to participate in the NABP InterConnect. Again, no NABP Foundation or other grant funds are being used directly for the NABP PMP InterConnect. To this end, as of October 10, 2011, the NABP Foundation has paid out \$203,340 to state PMPs or their software vendors for purposes of connecting individual states via the NABP InterConnect.

NABP PMP InterConnect

Purdue Pharma, L.P. Grant Disbursements as of 10/31/11

The NABP Foundation is making the Purdue unrestricted grant funds available to any state that needs and requests financial assistance to modify its prescription monitoring program (PMP) software to participate in the NABP InterConnect.

Date	Vendor	State PMP	Grant Disbursements
6/13/2011	Health Information Design Inc	South Carolina PMP	\$40,035
7/1/2011	Mahantech Corp	West Virginia PMP	\$43,200
8/10/2011	Health Information Design Inc	North Dakota PMP	\$40,035
8/29/2011	Health Information Design Inc	Kansas PMP	\$40,035
8/29/2011	Health Information Design Inc	Arizona PMP	\$40,035

Total Grant Disbursements:	\$203,340
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Funding for Enhancements

NABP is currently exploring several different types of pilots and expanded offerings for PMPs that would serve as significant enhancements to the NABP InterConnect and would benefit each participating PMP. Several participating PMPs have already engaged with health information exchanges, major chain pharmacies and pharmacy software systems that are interested in leveraging the “network” that will be created with NABP InterConnect. Similarly, NABP is finalizing the establishment of a PMP Clearinghouse that would serve as a single point of submission for entities that have to report to multiple PMPs. As the Clearinghouse and other pilots evolve towards operational systems, NABP plans to reinvest any net revenues from the systems back into the PMPs for future enhancements and functionality.

Beyond the NABP PMP InterConnect

At its August 30, 2011 meeting, the Steering Committee advised NABP to continue exploring uses of NABP InterConnect, beyond interstate data sharing. Specifically, the committee advised NABP to establish or explore the establishment of the following:

- PMP Clearinghouse for data submission;
- Integration of PMP data into Health Systems Pharmacy Software systems and Emergency Room Software Systems in order to integrate queries of the PMP programs into the normal workflow and enhance patient care; and
- To ensure greater continuity of patient care, NABP should work with state-level stakeholders and health professionals to explore integration of all prescription data into PMP, thus giving health professionals a much clearer and greater picture of the patient’s drug therapy.

Background on NABP

Organization/Mission

Founded in 1904, the National Association of Boards of Pharmacy is the impartial professional organization that supports the state boards of pharmacy in protecting public health. NABP aims to ensure the public’s health and safety through its pharmacist license transfer and pharmacist competency assessment programs, as well as through its Verified Internet Pharmacy Practice Sites^{CM} (VIPPS[®]), Vet-VIPPS[®], Verified-Accredited Wholesale Distributors[®] (VAWD[®]), and durable medical equipment, prosthetics, orthotics, and supplies (DMEPOS) accreditation programs. NABP’s member boards of pharmacy are grouped into eight districts that include all 50 United States, the District of Columbia, Guam, Puerto Rico, the Virgin Islands, Australia, eight Canadian provinces, and New Zealand. The Association is governed by its Executive Committee, whose officers and members are elected during the Association’s Annual Meeting.

NABP is a 501(c)(3) charitable and educational organization that has over 100 years of experience in providing regulatory support and assistance to its member boards, Food and Drug Administration, the Department of Justice, and other state and federal regulatory and patient safety agencies and organizations, all in the interest of protecting the public’s health, safety, and welfare.

The NABP Foundation is a separate 501(c)(3) charitable organization founded to educate the public about important health issues related to the practice of pharmacy and use of prescription medications. Its most important programs include the State Newsletter Program, as well as the **NABPLAW[®]** Online service, providing quick and targeted access to pharmacy laws in all 50 states, plus DC, Guam, Puerto Rico, and the US Virgin Islands. In addition, the NABP Foundation provides development assistance to NABP for new programs

How the Organization Supports Itself

NABP offers a wide array of products and services that our member boards of pharmacy utilize as they work to protect the public health through the regulation of the practice of pharmacy and the prescription drug supply chain.

Competency Assessment Programs

NABP's primary source of revenue comes from its competency assessment programs, such as the North American Pharmacist Licensure Examination® (NAPLEX®), the Multistate Pharmacy Jurisprudence Examination® (MPJE®), and the Foreign Pharmacy Graduate Equivalency Examination® (FPGEE®). Such competency assessment programs comprised 52% of 2010 gross revenue. Fees for the assessments offered by NABP are paid by the candidates for licensure and certification and not the states.

Accreditation Programs

NABP's accreditation programs include the DMEPOS accreditation program, (for which NABP is a Centers for Medicare and Medicaid Services-deemed accreditation entity), the VAWD program, the VIPPS program, and the Vet-VIPPS program. NABP's accreditation programs comprised 25% of 2010 gross revenue. Fees for accreditation are borne by the pharmacies and wholesale distributors and not the states.

License Transfer

NABP also facilitates a license transfer program to assist its member states in processing pharmacist licensure transfer requests from state to state. This program accounted for 11% of 2010 gross revenue.

As noted above, the fees associated with these programs are paid by applicants for licensure and registration and are part of state licensing requirements. State boards of pharmacy are responsible to NABP for a member fee of \$250 per year, which has remained unchanged since 1985.

The long-term stability of these various programs, coupled with careful financial planning, has contributed to NABP's financial strength. NABP can continue implementing new initiatives, such as the NABP PMP InterConnect, that will fulfill its mission of assisting its member boards and other regulators in protecting the public health.



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