

## IT Security & Prescription Monitoring



Oregon PMP Conference

December 5, 2008

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## Work Experience

- **Managed PMP for Maine (April 04 to November 06)**
  - System Managed by GHS Data Management
  - No breaches of the system (or other PMPs that I know of)
  - Web based querying for Prescribers & Pharmacists
  - Access to information is very similar to proposal in Oregon
- **Current PMP Manager for Washington State (implementation is underway)**
  - WA Law allows broader access to law enforcement and government agencies than the Oregon proposal
  - WA plans to have the entire system managed by an outside vendor as Maine did



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## Outline

- Statute, Regulations, & Policy
- Submitting the Data
- Storing the Data
- Reporting the Data
- Security Audits



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### Statute, Regulations, & Policy

- Restrict who has access
- Restrict reasons for access
- Restrict how they access
- Require validation of the requestor
- Set penalties for misuse



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### Submitting the Data

- Use secure website for automated or single uploads.
- Use of a secure web form for uploading single transactions for dispensers without a point of sale system.
- Use encryption on any media used to mail in records (cd or diskette).
- National Institute of Standards and Technology (NIST) & HIPAA



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### NIST

- Founded in 1901, NIST is a non-regulatory federal agency within the U.S. Department of Commerce. NIST's mission is to promote U.S. innovation and industrial competitiveness by advancing measurement science, standards, and technology in ways that enhance economic security and improve our quality of life.
- Computer Security Division (CSD) Publications give guidelines: <http://csrc.nist.gov/>
- CSD is charged with creating security requirements for Federal Information and information systems



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### Storing the Data

- Physical Security
- Application Security
- Database Security
- Network Security
- National Institute of Standards and Technology (NIST) & HIPAA



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### Reporting the Data

- Registration Requirements
- System Authentication (login)
- Features – timeout, inactivate accounts, audit trails, passwords
- Query Access vs. Request Only
- National Institute of Standards and Technology (NIST) & HIPAA
- Training & Privacy Statements



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### Security Audits

- Required Annually (contract)
- Included in Regulation
- Verifies physical, network, application, database, and policies
- Audit performed by a neutral third party



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# Contact Info

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