

# State of Nebraska Prescription Drug Monitoring Program Workflow Integration Policy

Policy: State of Nebraska Prescription Drug Monitoring Program Workflow Integration		
Effective Date: 03/25/2023	Review Date: 12/12/2024	Referenced Procedures:
Intended Audience: All Dispensers and Pharmacies required to report to the PDMP; Providers and Health Care Entities who will be implementing and utilizing the system		
Approval: 3/25/2023 3/27/2025 Title: Health Information Technology Board		

## STATEMENT

In accordance with the standards set forth under the Health Insurance Portability and Accountability Act (“HIPAA”) as well as federal and state statutory and regulatory requirements (hereafter referred to as “Regulatory Requirements”), CyncHealth is committed to ensuring the confidentiality, integrity, and availability of protected health information and electronic protected health information (PHI/ePHI), as well as any sensitive and confidential data it creates, receives, maintains, and/or transmits. For the purposes of this policy, PHI, ePHI and sensitive and confidential data shall be referred to herein as “Covered Information.”

## DEFINITIONS

- **Electronic Protected Health Information (ePHI):** Information that is “individually identifiable health information” and is created, received, maintained, or transmitted in any electronic form or medium.
- **Health Information Technology Board (HIT Board):** A seventeen-member board of healthcare professionals appointed by the Governor of Nebraska to oversee the State of Nebraska Health Information Exchange and the State of Nebraska Prescription Drug Monitoring Program (PDMP).
- **Interoperability:** The ability to exchange health information between electronic systems.
- **Prescription Drug Monitoring Program (PDMP):** The system in Nebraska established as a standalone medication query platform that collects all prescriptions dispensed from pharmacies and other dispensers, established through Neb. Rev. Stat. § 71-2454.
- **Protected Health Information (PHI):** Information that is “individually identifiable health information” and is created, received, maintained, or transmitted in any form or medium.
- **Workflow Integration:** The process of connecting the PDMP data to Electronic Health Record systems or pharmacy management software with the PDMP for purposes of administrative efficiency, patient safety, and reduction of provider burden.

## REFERENCES

- **Health Insurance Portability and Accountability Act of 1996, Pub. L. No. 104-191 (“HIPAA”)**
- **Neb. Rev. Stat. § 71-2454**
- **Neb. Rev. Stat. § 71-2455**
- **Medicare Access and CHIP Reauthorization Act of 2015, Pub. L. No. 114-10, Title I, § 101**
- **SUPPORT for Patients and Communities Act, § 5042 (Medicaid PARTNERSHIP Act)**
- **471 Neb. Admin. Code § 18-009**

## PURPOSE

The purpose of this policy is to document the State of Nebraska HIT Board’s responsibilities surrounding Nebraska PDMP data use. The objective is to provide clarity surrounding definitions and the relationships between the State of Nebraska HIT Board and CyncHealth. This policy seeks to establish parameters in compliance with regulatory requirements related to enabling providers and facilities to implement and maintain interoperability with the PDMP.

## SCOPE AND APPLICABILITY

This policy covers the Nebraska PDMP data use and data sharing overseen by the State of Nebraska HIT Board.

## ROLES AND RESPONSIBILITIES

The State of Nebraska HIT Board, with the support of both CyncHealth’s Vice President – PDMP & Pharmacy Programs and Chief Legal Counsel, will be responsible for the enforcement, interpretation, management, review, and education of this policy. Likewise, CyncHealth staff will be responsible for acknowledgement and adherence to this policy.

## POLICY

Nebraska Revised Statute 71-2454 (6) – (7)(f) allows for PDMP data sharing if the entity receiving the data has privacy protections at least as restrictive as those set forth in this section and has implemented and maintains the minimum safeguards required by subsection (6) of this section, the statewide health information exchange described in Nebraska Revised Statute 71-2455, in accordance with policies adopted by the Health Information Technology Board and in collaboration with the department, may release the prescription drug information and any other data collected pursuant to this section to:

(f) Electronic health record systems or pharmacy-dispensing software systems for the purpose of integrating prescription drug information into a patient's medical record.

This policy is to authorize CyncHealth to facilitate workflow integration with healthcare facilities to connect to the PDMP through interoperability methods, which aligns with state and federal policies and regulations in addressing the opioid crisis. These include, but are not limited to, CMS Quality Payment Program Merit-based Incentive Payment System, SUPPORT Act Section 5042, and Nebraska Medicaid

regulations Title 471 NAC 18. This policy would enable healthcare providers to meet regulatory requirements and reduce the burden of clinicians in meeting these requirements. CyncHealth may work with healthcare facilities which have met all statutory, regulatory, and technical interoperability requirements of CyncHealth to implement PDMP workflow integration.

CyncHealth will perform integrations using data transmission standards set by RxCheck, the PDMP data-sharing hub funded by the Bureau of Justice Assistance and utilized by the Nebraska PDMP. Currently accepted standards include:

- NCPDP Script v10.6
- NCPDP Script 2017071
- NIEM
- PMIX
- FHIR r4
- Additional formats as made available

CyncHealth shall provide a report to the Health Information Technology Board of existing and recently implemented integrations with healthcare providers and facilities.

## COMPLIANCE

CyncHealth staff will be required to comply with all information security policies and procedures as a condition of employment or contract with CyncHealth. CyncHealth staff who fail to abide by the requirements outlined in the HIT Board PDMP Data Requests Policy and Procedures will be subject to disciplinary action up to and including termination of employment or contract.

## ANNUAL REVIEW

<b>Date:</b>	<b>Reviewed By:</b>	<b>Comments/Updates:</b>
12/21/2024	HIT Board – Policy Review Committee	Updates to policy words, references