

## **Additional Guidance to Harold Rogers Prescription Drug Monitoring Program (HRPDMP) Grantees on Interstate Data Sharing Activities**

**In Reference to BJA's Interim Policy on Allowable Uses for HRPDMP Grant Funds (March 21, 2012)**

**April 17, 2012**

On March 21, 2012, BJA issued a statement clarifying the current policy on allowable uses for HRPDMP grant funds. With this new interim guidance, BJA has expanded the number of ways that grantees may use HRPDMP funds to support interstate data sharing activities to include alternative hub solutions that conform to the Prescription Monitoring Information Exchange (PMIX) Architecture (see <https://www.bja.gov/Programs/PDMPInterimPolicy.pdf> for complete details). Since that time, BJA has received numerous inquiries from the field regarding the implications of the Interim Policy on grantees. This document attempts to respond to these questions and clarify the potential impact to current and future HRPDMP grantees.

### **PMIX Architecture and Hub Solutions**

Although the Alliance of States with Prescription Monitoring Programs (ASPMP) membership has yet to formally review the PMIX Architecture as of March 21, 2012 (the date the interim policy went into effect), BJA recognizes and requires adherence to the PMIX Architecture in its current form. The rationale for this is as follows: 1) The Architecture is largely a formalization of the existing PMIX Specifications which were already required, with the addition of a new Hub-to-Hub specification and several operational elements needed to support a multi-hub environment; 2) The Architecture has been drafted by a technical working group charged by ASPMP and with participation of ASPMP staff, state Prescription Monitoring Programs (PMPs), PMP software providers, and interstate hub providers to confirm Architectural decisions are operationally expedient; 3) The current PMP marketplace requires timely action to ensure that as interstate sharing capabilities are adopted, states and their hub providers are adhering to consistent national standards that will enable nationwide communication between states regardless of the chosen solution.

As indicated in the Interim Policy, the RxCheck hub (formerly PMIX hub) is currently the only hub that is confirmed to fully meet the specifications of the PMIX Architecture. This is a direct result of the fact that RxCheck was designed from the beginning to serve as a reference hub implementation, to be enhanced per the direction of the PMIX Committee in accordance to the PMIX Specifications and other functional requirements. This in no way prohibits states from using HRPDMP funds to implement alternative solutions that can be certified conformant to the PMIX Architecture. To date, no alternative hub solutions have been certified conformant with the PMIX Architecture, nor even with the PMIX Specifications.

BJA is addressing this issue in two ways: the first has previously been discussed and consists of expediting the formalization of the PMIX Architecture as a grant requirement for interstate data sharing; the second lies in the creation of a formal certification process by which state PMPs or hub solution providers may evaluate conformance to the PMIX Architecture. BJA is working closely with the IJIS

Institute and its Springboard Initiative to put this process in place as soon as possible. It is incumbent on grantees to either confirm conformance of their PMP interface to the Architecture, or to confirm with their hub provider the plan for achieving Architecture certification as soon as possible. Until such certification occurs, HRPDMP funds MAY NOT be used to support interstate data sharing activities. Please contact BJA directly if you have questions about hub conformance or how a hub can be deemed conformant in the future.

### **Grant Requirements- Current Grantees**

Regardless of the evolution of the PMIX Architecture and related policies, all HRPDMP grantees are required to meet the individual obligations and requirements set forth within their grant documentation. This includes the program activities and expenditures in the grantee's approved Program Narrative and Budget/Budget Narrative in the Grants Management System (GMS), any special conditions that the grantee is subject to, as well as adhering to the OJP Financial Guide. If a grantee wishes to change the scope, duration, activities, or other significant purpose areas of the grant, BJA must provide prior approval in the form of a Grant Adjustment Notice (GAN) before such changes can be acted upon. Specific guidance on this issue can be found in the OJP Financial Guide.

[http://www.ojp.usdoj.gov/financialguide/PDFs/OCFO\\_2011FinancialGuide.pdf](http://www.ojp.usdoj.gov/financialguide/PDFs/OCFO_2011FinancialGuide.pdf)

### **Changing Hub Solutions- Current Grantees**

Therefore, if the grantee wishes to adopt a hub solution other than that which the grantee had identified in the approved grant documentation, the grantee must submit a GAN documenting this requested change of scope, which then requires BJA approval. Although the BJA Interim Policy opens the door to the potential use of hubs other than RxCheck, the grantee is still bound to use the solution documented in their grant documentation until the grantee receives an approved GAN allowing for changes to be made. Note that BJA will not approve requests to adopt solutions that are not certified to be PMIX Architecture conformant. Consideration may be provided if the grantee can submit written documentation of the hub provider's plan to come into conformance, including specific dates for delivery, to which the grantee will be held.

If you have any questions about your grant requirements or other questions pertaining to the BJA Interim Policy or the Harold Rogers Prescription Drug Monitoring Program, please contact Danica Szarvas-Kidd at the Bureau of Justice Assistance at (202) 305-7418 or [Danica.Szarvas-Kidd@usdoj.gov](mailto:Danica.Szarvas-Kidd@usdoj.gov).