



December 15, 2020

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Jason,

The PMIX Executive Committee would like to thank you for your feedback regarding the newly proposed schemas posted in September 2020. Below we have provided some feedback on the questions and concerns that you expressed. We hope that this information will aid you in understanding the new proposals, their foundation in the existing standards and the intent for the changes. The information outlined includes your comments in blue and the Committee's feedback in red.

- Can you please provide me with the names of the states, vendors, and other participants who *actively* contributed to the creation of the proposed standards? **Please see the attached list for membership of our committees.** As you can see, there are many vendors and states represented. Seventeen states participate in PMIX Executive and Subcommittees along with state, federal and other stakeholder group representatives. As you may know, some folks receive meeting notices but do not attend meetings regularly. We only have a small number representatives that expressed interest but do not attend regularly. The most active vendor representation that we have is from Appriss, who participated throughout the development process.
- It would be beneficial to know if/how these proposed changes were potentially influenced by a minority of state programs and/or vendors that may deviate from the widely accepted norms. **Please explain what deviation from widely accepted norms you are referencing.** The changes to the request and response schemas were almost entirely based on the latest versions of ASAP and NIEM which are two widely accepted norms used in our PDMP transactions today. The current data exchange standards used between PDMPs have been based on these standards since their inception in 2010/2011 timeframe. We are continuing to use the already established methodology.
- Why would PMIX force states to invest more into the SOAP specification when the technology industry is moving away from it? (For example, Amazon Web Services deprecated many of their SOAP API's in 2015 and Microsoft's .NET Core development language does not offer support for SOAP) **PMIX does not require SOAP, we don't require any particular technology at all and have not required it since the new Security Standard went into effect several years ago.** The new standard can be found on the PMIX website. It is a subset of NIST standard for information security used for HIPAA and other major information security initiatives. Explain that we replaced the SOAP requirements with the new standard.
- Why does PMIX not leverage well-recognized, forward-looking healthcare standards such as FHIR? FHIR appears to be the future of healthcare technology standards, while PMIX guidelines were created by a handful of state PDMP administrators. **There is a FHIR standard through the Office of the National Coordinator for Health**

Information Technology Standards and Interoperability Framework that is in use by a number of PDMPs. No approved or proposed PMIX standard preclude the use of FHIR or any other standard for workflow integration.

- What exemptions or exclusions will exist for existing integrations/hubs/platforms? The Standards Compliance process for the PMIX National Architecture is a tiered process. Each standard has a minimum level of compliance as well as higher levels. This process is designed to allow a baseline to exist without causing compliant states or vendors to choose to comply with other components of the standards. Some of the standards also have exemptions and plan for changes processes. These allow a request for exemption to be process or to be compliant while still adopting some of the standards.
- The proposed changes could make our integration's 2-call approach and PMPI "non-standard" and disrupt hundreds of thousands of integrations and millions of interstate transactions per month. The alternate metadata schema is an alternate. You could continue to use the existing metadata schema for the initial call. You could choose to employ the alternate metadata schema in the second call to pass additional information on the second call. The alternate metadata schema was largely based on the information that is in the APPRISS log files for those second calls.
- Is a RESTful representation of the data described in the PMIX standard considered compliant? RESTful security can be certified as PMIX compliant per the PMIX Security standard which is NIST 800-171 r1 (you can find more information on the PMIX website).
- The initial documentation provided for PMIX 3.0 changes is not sufficient for a thorough technical assessment. Please provide all service specifications and schemas for review. In light of the lack of detailed information, we are requesting additional time to review all available material. The email about the new standard stated that anyone interested in the xsd files can request them. We have had one request from Clay Rogers of Appriss and the files were provided to him.
- What protocols are in place with the PMIX Executive Committee to ensure all state PDMPs have an opportunity to review, comment and weigh-in on any and all proposed PMIX changes prior to proposals being submitted? Please see the PMIX bylaws on the website for the process to change the PMIX architecture. Please note that all PDMP representatives, all PMIX committee members and all vendors that we are aware of were included in the request for comment.
- How does PMIX plan to enforce the new version? Will it be optional? Standards adoption is voluntary for any standards organization that I am aware of. For example, HL7 does not force you to use their standards. Standards are used to build a common ground for the exchange of information, business practices, safety measures, etc. PMIX does not have an enforcement process, it has a certification process. We have even built levels of certification to avoid an all or nothing type of scenario for standards compliance.
- As you are already aware, many states rely (in large part) on their vendors and/or state technology agencies for guidance on both technical and security-related issues. It is widely believed that only a select few states, for a multitude of reasons, actively participate in PMIX discussions which causes a large group of states to feel marginalized. It would be highly beneficial to the PMIX group as well as PMP programs to engage more states directly INCLUDING their technical resources so that meaningful, informed dialogue can occur and that states can be equally represented. I think the Executive Committee and committee chairs would agree that we would welcome any state that is interested in participating.

Please let us know if you have any additional questions. We look forward to your joining the Executive Committee in January.

Sincerely,

Jean Hall, Chair

Chad Garner, Vice Chair

Stan Murzynski, Secretary