



National Association of State
Controlled Substances Authorities

NASCSA Resolution 2018 - 05
October 2018
Scottsdale, AZ

A Resolution Encouraging Prescription Monitoring Program (PMP) Administrators to Notify All PMP System Account Holders of Their Responsibility to Protect Their Credentials to Access PMP Systems.

WHEREAS, each PMP Administrator assigns unique PMP system credentials to individuals or entities with direct access to their jurisdiction's PMP system; and

WHEREAS, those credentials are used to access protected health information, regarding an individual's controlled substance prescription history, contained in PMP databases;

WHEREAS, secure and controlled access to the data is of the utmost importance in keeping protected health information safe and secure;

WHEREAS, there are third party data analytic solution providers, who are not under contract with the PMP, which may require a permissible user to provide their PMP credentials to the solution provider to facilitate the retrieval of data; and

WHEREAS, the data which is retrieved may be "screen scraped" and used by the third-party solution to perform data analysis for their client;

THEREFORE, BE IT RESOLVED, that the members of the National Association of State Controlled Substances Authorities (NASCSA) strongly encourage all Prescription Monitoring Program Administrators to notify their PMP system account holders of their responsibility to protect their credentials for access to any and all PMP systems;

BE IT FURTHER RESOLVED, that the members of NASCSA encourage all Prescription Monitoring Program Administrators to monitor their data for aberrant querying behaviors and when permissible suspend access to the PMP system until the account holder can be educated on their responsibilities for protecting their PMP credentials; and

BE IT FURTHER RESOLVED, that NASCSA provide a copy of this resolution to each Prescription Monitoring Program throughout the nation.

ATTEST:

A handwritten signature in blue ink that reads "Barbara Q. Carter".

President

DATE: November 1, 2018