Mississippi
Board of Pharmacy

5 – YEAR STRATEGIC PLAN

FOR THE FISCAL YEARS 2022– 2026

Mississippi Board of Pharmacy (846-00)
July 2020

MISSISSIPPI BOARD OF PHARMACY

1. Comprehensive Mission Statement

The mission of the Mississippi Board of Pharmacy is to protect the health, safety and well-being of the citizens of the State of Mississippi by regulating and controlling the practice of pharmacy and the distribution of legend drugs and devices.

2. Philosophy

The Mississippi Board of Pharmacy is committed to continuing its efforts to safeguard and protect the Public Health and Safety of Mississippians through our philosophy of:

- Providing the highest professional standards of quality and appropriate service to the citizenry;
- Respecting the rights and liberties of all citizens;
- Assuming a leadership role in developing, implementing, and enforcing the highest standards ethics, efficiency, effectiveness and openness;
- Providing optimal services to the public and profession;
- Utilizing resources in an efficient, effective, responsive and transparent manner;
- Demonstrating a balanced and sensible approach to the regulation of pharmacy for the taxpayers and citizens of Mississippi.

3. Relevant Statewide Goals and Benchmarks

Statewide Goal #1.: ECONOMIC DEVELOPMENT
"To develop a robust state economy that provides the opportunity for productive employment for all Mississippians."

Relevant Benchmarks #1.:
- *"Number of jobs in each of the Mississippi Development Authority's seven targeted industries: advanced manufacturing, aerospace, agribusiness, automotive, energy,* **HEALTHCARE,** *and shipbuilding";*

- Employment in Mississippi Pharmacy related jobs, as it relates to the health of pharmacy-related businesses and the citizen's access to general Pharmacy services due to the manipulation and redirection of pharmaceutical services nationally;
- Mandatory Mail Order of pharmaceuticals required by some Pharmacy Benefit Managers (PBMs) and providers and its effect on access to pharmacy and Freedom of Choice in pharmacy for;
- Revenue drain from Mississippi's small businesses community pharmacies to out of state entities required through the redirection of pharmacy services by PBMs;

Statewide Goal # 2.:   PUBLIC SAFETY AND ORDER

"To protect the public's safety, including providing timely and appropriate responses to emergencies and disasters and operating a fair and effective system of justice."

Relevant Benchmarks #2.:   EMERGENCY & CRISIS RESPONSE
                                                      THROUGH PREPAREDNESS

- The *Health, Medical & Pharmaceutical Disaster Support Center (HMPSC)* within the Board of Pharmacy;
- Improved participation and communications within 'like' Health-related agencies for Disaster Preparedness and Response
- Continued development of relationships and encouraging a holistic philosophy with other stakeholder agencies, organizations and law enforcement in the battle against Prescription Drug Abuse and Diversion using the MS Prescription Monitoring Program (MSPMP)
- Maintain a PBM contact list for emergency purposes (waive copays, early refills, etc.);

Statewide Goal #3.:   HEALTH

"To protect Mississippians from risks to public health and to provide them with the health-related information and access to quality healthcare necessary to increase the length and quality of their lives."

Relevant Benchmarks #3.:

- Enhancement of the Mississippi Prescription Monitoring Program (MSPMP) in our efforts to fight Prescription Drug Abuse and Diversion;
- Complaints from the citizenry concerning Pharmacy Benefit Manager (PBM) issues;
- Compounding Certificates
- PIC Training
- Technician Training
- Develop a Nonresident pharmacy and wholesaler license committee

Statewide Goal #4.:   GOVERNMENT EFFICIENCY
"To create an efficient government and an informed and engaged citizenry that helps to address social problems through the payment of taxes, the election of capable leaders at all levels of government and participation in charitable organizations through contributions and volunteerism."

Relevant Benchmarks #4.:

- *"Average wait time for government services";*
- *"State dollars saved by providing government services online (e.g., document retrieval, issuance of new business permits, license renewal);*
- Integrate Licensing, compliance, and legal into one format within Thoughtspan;
- Digital documentation and retrieval capability;
- Expanding online information and renewal capability;
- Develop downloadable applications to improve communication and functionality for both internal operations and public access to information;
- Develop more efficient fingerprinting strategy;
- Become a data verifying agency, not a data processing agency;
- Develop more reliable and accurate agency statistics;

4. **Overview of the Agency 5-Year Strategic Plan**

The Mississippi Board of Pharmacy is composed of four divisions, including the:

- **Compliance Division**
- **Licensing Division**
- **(MSPMP) MS Prescription Monitoring Program Division**

- **(PBM) Pharmacy Benefit Manager Division**

The MSPMP and the PBM programs were added as separate programs within the FY15 legislative budget request. Legislative authority was provided to the Board of Pharmacy to administer these programs in 2005 and 2011, respectively.

Compliance Division

The Compliance Division of the Board Pharmacy monitors and enforces the regulations of the practice of pharmacy in Mississippi by conducting routine inspections and investigations of licensees, registrants, and permitted facilities. The Compliance Division is the primary Division responsible for the investigation of drug diversion from permitted facilities within the State. The Board has set a goal to inspect all in-state facilities at least every 18 months. The Board of Pharmacy has begun issuing compounding certificates to all pharmacies that perform non-sterile and sterile compounding. The Compliance Division must approve the certificate from the review of the inspections conducted on each pharmacy. Dispensing physicians will obtain a permit, and once that permit is obtained, the Compliance division will inspect those facilities. Compliance Officers are assigned specific regions of the State to conduct inspections and to conduct investigations, as necessary. These inspections/investigations will include physician dispensing and marijuana dispensaries (if passed and placed under the Board of Pharmacy).

The Board is authorized to conduct disciplinary proceedings as directed by the Investigative Review Committee of the Board. The Board promotes voluntary compliance by communicating information to pharmacists and other registrants utilizing personal contact by agents of the Board and through newsletters, website, email, social media, or other correspondence. The Compliance Division serves as an information source for consumers, licensees, registrants, and state and federal law enforcement and regulatory agencies. The Board will register students in the State while attending pharmacy school. This includes conducting background checks. The Compliance Division educates the students on the Mississippi Pharmacy Practice Regulations and issues related to pharmacy practice, such as diversions and the types of violations that may be found.

Licensing Division

The function of the licensing Division is the issuance of new licenses, permits, and registrations as well as renewal of same. Licenses and controlled substance registrations

are issued to pharmacists and students. All persons working in a pharmacy as a Pharmacy Technician are issued registrations. All pharmacies, hospitals, drug facility permits (wholesalers in and out of State), home/health hospices, nursing homes, mail-order pharmacies, pharmacy benefit managers (PBM), and durable medical equipment suppliers are issued licenses, permits, and registrations. The number of licenses and registrations issued exceeds 20,000 annually. Physician Dispensing and Marijuana Dispensaries will also receive licensure if passed. Staff development is being pursued so that we can become more effective and efficient.

The operational funds for the Board are generated from fees received from the issuance and renewal of licenses, permits, and registrations with spending authority provided through
the legislative appropriations process. The Licensing Division provides information regarding licensure, permitting, and verification. They work with students to ensure seamless testing and licensure requirements.

The Board of Pharmacy Thoughtspan software is being developed and will go live soon. This complex licensing software will move the Board of Pharmacy to a much higher level of service and information access. We need to be increasing our capabilities in a constantly evolving statutory and regulatory environment. To that, the Board of Pharmacy has begun digitizing our records. Additionally, the Licensing Division is actively seeking ways to improve the criminal background check process.

Mississippi Prescription Monitoring Program (MSPMP) Division

The MSPMP monitors the dispensing of schedule II-V controlled substances. The information collected is available to practitioners, pharmacists, or their designated agents, the Division of Medicaid, law enforcement entities, and state regulatory agencies.

The most important objective of the MSPMP is to reduce prescription drug abuse by providing patients controlled substance dispensing profiles to practitioners who administer, prescribe, or dispense Controlled Substance Drugs. The second objective is to provide education and training programs for all users of the program through professional collaborations, and effective marketing strategies to register all users and bring all stakeholders together in a collaborative force to prevent and deter prescription drug abuse and the Diversion of controlled substances. The third objective of the MSPMP is to educate all sectors of the public relating to the dangers, laws, and citizen responsibilities

relating to controlled substance prescriptions, doctor shopping, and prescription drug abuse. In the past 18 months, we have continued our work with other state and federal agencies in our efforts to combat the Opioid and Heroin Crisis. Our approach to educating the public is founded using a holistic approach that covers all sectors of the State's population from youth to the elderly. We have teamed with the MS Bureau of Narcotics, the MS Department of Public Safety, the MS Department of Mental Health, the MS Department of Human Services, the MS Board of Medical Licensure, the MS Board of Nursing, the FBI, the DEA, along with others.

The Mississippi Prescription Monitoring Program (MSPMP) Division will continue to expand its effort to offer a cohesive program that protects the privacy of the citizens of Mississippi but at the same time offers an efficient tool for the medical community, law enforcement, and regulatory agencies for the intervention of prescription drug abuse and the Diversion of controlled substances in Mississippi. The Mississippi Board of Pharmacy, through the MSPMP, is taking a holistic approach to these issues. MSPMP will continue to work with organizations locally, nationally, and with other states in finding and implementing more efficient solutions, to fully utilize the MSPMP. BOP continues to enhance its ability to provide the most accurate and effective data, the extraction of data to conduct detailed data analysis, and to provide other appropriate entities with non- identifying statistical data for research and educational purposes better to serve the health and safety of all Mississippi citizens.

Pharmacy Benefit Manager Program (PBM) Division

The function of the Pharmacy Benefit Manager Program (PBM) Division is to license Pharmacy Benefit Managers that conduct business in the State of Mississippi and to renew the PBM licenses annually. The PBM Division also is charged with collecting, cataloging, and responding to complaints received from citizens and health care providers to provide protection for individual Mississippi citizens and to facilitate better patient care and access to pharmacy.

The PBM division acts as the voice of the citizen in an increasingly complex and changing health care climate. There is a constant barrage of changes in health care and specifically prescription drug services to our citizens. The domino effect of what can first be perceived to be a small and inconsequential change; can many times grow to impact our citizens in Mississippi negatively. These issues can dramatically limit the access our citizens have to pharmaceutical care and services. The poor and elderly of our State are affected most

brutally through these changes.

The Mississippi Board of Pharmacy currently licenses or permits over 688 out of state or nonresident Mail Order Pharmacies. Recent years have seen a marked increase in the redirection of prescriptions required by PBMs to be filled through these out of state or foreign entities. This mandatory redirection of prescription services to these out of state facilities can negatively affect Mississippi business revenue and job security for the citizens of Mississippi. These factors additionally harm the small communities of our State. This creates reduced revenue for our State and negatively effects the 'health' of our Small Business Community Pharmacies.

The Pharmacy Benefit Manager (PBM) division of the agency will continue to communicate regularly with local, state, and national entities to more clearly define issues, identify problems and develop solutions to changing PBM issues that affect the pharmacy services, health and economic stability of the Mississippi health community.

New statutes will need rules and regulations promulgated for HB708.

HMPSC – Health, Medical & Pharmaceutical Support Center

After a detailed consultation with (MEMA) Mississippi Emergency Management Agency and Dr. Jim Craig, Director of the Office of Public Health Protection with the Mississippi Department of Health, the Board of Pharmacy has established the Health, Medical & Pharmaceutical Disaster Support Center (HMPSC). Space for the (HMPSC) has been included in our current headquarters facilities. The Board of Pharmacy continues to work closely with the MS Department of Public Protection in the development of this disaster support center as part of ESF 8 and the Governor's Disaster Plan.

Under the Governor's Comprehensive Emergency Management Plan (CEMP), the Mississippi Department of Health serves as the "Coordinating Agency" for all health and medical disaster response services. The Governor's CEMP requires that the Board of Pharmacy designate a primary and alternate Emergency Coordinating Officer to report to the ESF-8 Public Health Command/Coordination Center (PHCC) and the State Emergency Operations Center (SEOC); ensure adequate communications are established and maintained; support the resource pool by providing available resources as needed; coordinate efforts through a liaison to ESF-5 if needed, and assist in gathering and providing information to ESF-5 for establishing priorities and to ESF-15 for press releases. In addition, the CEMP requires the Board of Pharmacy to provide credentialing and

investigative service for volunteer pharmacists and pharmacist technicians both in and out of Mississippi and requires our assistance in the placement of volunteer pharmacists and pharmacist technicians during an emergency. The Mississippi Board of Pharmacy must coordinate all these activities in compliance with the National Incident Management System and the Governor's Executive Order No. 932 related to multi-jurisdictional incident management.

We have completed our work on our Continuity of Operations Plan and continue to work with the Office of Public Protection in the planning and development of the HMPSC, including our Concept of Operations Plan (CONOPS). The Board of Pharmacy is actively involved in state disaster response, recovery efforts, and planning. Our efforts in this area are intended to maximize our efficiencies and capabilities in protecting the Public Safety, Order, and Health during and after a disaster. The Board of Pharmacy is actively participating in the statewide COVID-19 response.

5. **Agency's External/Internal Assessment**

    1) Changes in State or Federal laws, which would include any movement on statewide approval of Medical Marijuana and the Drug Supply Chain Security Act (DSCSA) that would encompass pharmacy/pharmacist's role and involvement, will need to be assessed. This will also include education surrounding the changes with the standards set by USP 797, USP 795, and USP 800. The Board of Pharmacy will be charged with updating and educating the pharmacists for their role and ensuring that their licenses and procedures are compliant. Staff will need to be trained on all of the changes.
    2) The Diversion of Controlled Prescription Drugs continues to be a growing issue in Mississippi and around the Country.
    3) Enhancement of PMP Interconnect (sharing of PMP data with other states) is necessary to combat the expanding role of the MSPMP in the battle against Prescription Drug abuse and Diversion of prescription drugs.
    4) Online renewal capability is a crucial step in becoming more efficient.
    5) Economic or catastrophic conditions that relate to the healthcare of the citizens of the State of Mississippi
    6) Full implementation of the Health, Medical, and Pharmaceutical Disaster Support Center (HMPSC) is vital to the fulfillment of our obligation to the public in Disaster Support and Response.

7) Continued manipulation of pharmacy services by PBMs can be detrimental to the citizen's access to Pharmaceutical Services.
8) Emerging new methods and requirements to conduct agency functions

Through monthly meetings of Program Division Directors, and the Executive Director, the Board of Pharmacy staff makes decisions and recommendations. As deficiencies are recognized, recommendations for improvements are made. Budgetary constraints are always considered when new or expanded projects are recommended or requested. Financial and procedural advice is obtained through a third party contracted financial consultant along with in house counsel. This contracted financial consultant performs all accounting functions for the agency.

While interfacing with various State and National associations, agencies and organizations, including the National Association of Boards of Pharmacy (NABP)and MALTAGON (An organization of southeastern Boards of Pharmacy, the Board continues to identify developments in the field of practice and determine how these affect the practice of pharmacy in the State of Mississippi.

6. **Agency Goals, Objectives, Strategies, and Measures by Program for FY 2022 through FY 2026:**

Program 1: Licensing Division

GOAL A: License for the practice of pharmacy shall be obtained by all persons prior to their engaging in the practice of pharmacy. (Miss. Code Ann. § 73-21-83, (2))

    OBJECTIVE A.1.   LICENSE, PERMIT, REGISTER and RENEW

        Outcome: Process and verify pharmacy technician, student intern/extern-controlled substances registration, pharmacists, and facility permits, physician dispensing, and marijuana dispensing to those individuals and entities that met minimum requirements;

        Outcome: Deny licenses to applicants not meeting Board requirements or Mississippi standards

Outcome: Ensure the proper qualifications for licensing are met

OBJECTIVE A.2.   INCREASE EFFICIENCY

Outcome: Decrease the average wait time for services

Outcome: Increase accuracy in processing and documenting

Outcome: Save State dollars by increasing productivity through providing renewals, applications, and inquiries online

Outcome: Make the process more user friendly and efficient, while still obtaining the information necessary to determine eligibility for licensure

Outcome: Continue to refine the licensure process that has reduced nonqualified, ineligible, and a reduction in false applications

Outputs: Report the number of New Student Licenses Issued

Outputs: Report the number of Permits Issued to All Facilities

Outputs: Report the number of Pharmacy Technician Registrations Issued

Outputs: Report the number of Pharmacists Licenses Issued

Outputs: Report the number of Controlled Substances Permits Issued

Outputs: Report the number of Compounding Certificates issued

Efficiencies: Cost of Operations (program cost divided by the number of Licenses)

Outcomes: License all Pharmacy Professionals (%)

Outcomes: Assist all professional licensees as needed with licensure issues on a one by one basis (%)

Outcomes: New Licenses Issued Within Ten Business Days (%)

Outcomes: Renewals Issued Within Two Business Days (%)

A.2.1. STRATEGY   Obtained a new licensure software system

Output: Regular planning meeting with the software provider for enhancements

Efficiency: State dollars saved through increased productivity

Efficiency: Fingerprinting

Efficiency: Digitizing

A.2.2 STRATEGY Education and Information

Output: Web tutorials and easily accessed information for the users and those who report to the site

Program 2: Compliance Division

GOAL A: The Board shall be responsible for the control and regulation of the practice of pharmacy, to include the regulation of pharmacy externs or interns and pharmacist technicians, in this State, the regulation of the wholesaler distribution of drugs and devices as defined in Section 73-21-73, the distribution of sample drugs or devices by manufacturer's distributors as defined in Section 73-21-73 by persons other than the original manufacturer or distributor in this State and the regulation of pharmacy benefit managers as defined in Section 73-21-153. (Miss. Code Ann. Section 73-21-83., (1))

OBJECTIVE A.1.   To regulate and control the practice of pharmacy and

distribution of drugs and devices within and into the State of Mississippi

Outcome: Protect the health and safety of the Citizens of the State of Mississippi

Outcome: Reduce Diversion of controlled substances and habit-forming legend drugs from permitted facilities by pharmacists, pharmacy technicians, and pharmacy personnel from permitted facilities by enforcement of provisions of the Mississippi Pharmacy Practice Act and the Mississippi Pharmacy Practice Regulations

Outcome: Assure that all persons/facilities are properly licensed, registered or permitted to engage in dispensing or distribution of drugs and devices within or into the State of Mississippi

Outcome: Assure compounding pharmacies meet standards

Outcome: Information source for consumers, licensees, registrants, permittees, and State and Federal regulatory and law enforcement agencies regarding compliance with applicable Mississippi Pharmacy Practice Regulations, Federal and State Laws regarding the dispensing and distribution of drugs and devices and compliance with the Uniform Controlled Substance Act

Outcome: Promulgation of laws and regulations that pertain to the practice of pharmacy and distribution of drugs and devices

Outcome: Increase compliance in new compounding standards through compounding certificates and inspections to protect citizens and patients

Outcome: Increase compliance in new Hazardous drug standards and participate in Memorandum of Understanding with FDA to protect employees

Outcome: Preparation and issuance of Notices of Hearing and Complaint for violation of Mississippi Pharmacy Practice Regulations and Mississippi Pharmacy practice Act on the order of the Investigative Review Committee and scheduling and conduct of disciplinary proceedings before the Board

Outcome: Preparation of Board Minutes and Minutes of Investigative Review Committee and correspondence of all types regarding actions and orders of the Board

Outcome: Maintenance of Statistical data for Division

A.1.1. STRATEGY: Conduct routine inspections of all facilities located within the State for compliance with Regulations of the Board and State and Federal laws, regulations, and rules.

Output: Number of Audits and Inspections of facilities conducted per fiscal year

Output: Number and type of compounding facilities licensed, and compounding certificates issued and the review of nonresident compounding pharmacies for issuance or renewal of their compounding certificate

Efficiency: Average cost per facility inspected

A.1.2. STRATEGY: Conduct investigations as necessary of Pharmacists, Pharmacies, Pharmacy Technicians, Student Intern/Extern, and or facility employees that violate Regulations of the Board or State and Federal Laws and regulations.

Output: Number of Audits and Investigations conducted per fiscal year of licensees, registrants, permittees and employees of permitted facilities

Efficiency: Average cost per investigation conducted (total cost of program divided by the number of Investigations conducted)

Output: Number of Written Complaints Received

Outcomes: Written Complaints Resolved Within Six Months (%)

Outcomes: Investigations Conducted due to the Diversion of Prescription Drugs, Impaired

Outcomes: Investigations Conducted due to the Pharmacist and Pharmacy Technicians

Outcomes: Recidivism Rate for those Receiving Disciplinary Actions (% Average of 3 years)

A.1.3 STRATEGY: Education and Information

Outcomes: Pharmacist In Charge

Outcomes: Technicians

Program 3: Mississippi Prescription Monitoring Program (MS PMP) Division

GOAL A: Effectively support the legitimate use of controlled substances while being proactive in safeguarding public health and safety. (Mississippi Code § 73-21-127) **- Board of Pharmacy to develop and implement a computerized program to track certain prescriptions; report of suspected abuse and misuse of controlled substances; access to collected data; confidentiality; penalties for knowingly failing to submit or submitting incorrect dispensing information**

Outcome: Assist practitioners in providing proper pharmaceutical care when prescribing controlled substances.

Outcome: Deter drug abuse and addiction to controlled substances by giving the prescriber the tools needed to make informed decisions

Outcome: Lower the number of overdose deaths due to controlled

substance prescription drugs

Outcome: Provide more individuals access to the assistance needed for recovery from drug addiction

Outcome: Deter overprescribing of controlled substances by notifying appropriate regulatory boards or law enforcement

Outcome: Reduce fraud, waste, and abuse by sharing data with the Mississippi Division of Medicaid and facilitating data analysis and cooperative efforts with Mississippi Medicaid and the MSPMP software vendor. Assist with outcomes by providing de-identified data to those conducting research.

A.1.1. STRATEGY: EDUCATION AND INFORMATION

Output: Coordinate with those in the State who are already working with specific age groups, etc. and focus our efforts where attention is lacking

Output: Work with the other state agencies to inform and educate pharmacy, healthcare professionals, and the public

Output: Web tutorials and easily accessed information for the users and those who report to the system.

Outputs: Report the number of Training and Educational Activities Conducted

Efficiency: Educating those about the program and educating students while in school regarding prescription drug dangers

Explanatory: Heading off addiction, experimentation, and illicit use before it starts. Increasing system use and evaluation of information

Outputs: Report the number of Prescribers, Dispensers and Entities Registered

Outputs: Report the number of Patient Inquiries

Efficiencies: Cost of Operation (program cost divided by the number of prescribers and dispensers registered)

Outcomes: System Registrations (%)

Outcomes: In-State Physician Registered Users of the MSPMP (%)

Outcomes: Out of state physician registered users %

Outcomes: Licensed APRN Registered Users of the MSPMP (%)

Outcomes: Pharmacists registered users %

A.1.2. STRATEGY: PUBLIC HEALTH INITIATIVES

Output: Providing de-identified information for research in areas that affect public health and safety, such as through the Department of Health for vital statistics data.

Output: Continue to share data with the Mississippi Division of Medicaid to assist in the fight to prevent fraud, waste, and abuse in Medicaid and other government-funded programs.

Output: Continue to collaborate and support the use of Naloxone for first responders and the general public to prevent overdose deaths

Output: Continue to educate Pharmacists in the dispensing of Naloxone through the development of online training

Output Utilize the PMP Advisory Committee for continued

advice and support

Efficiency: Increase knowledge of drugs used and abused to decrease overdose deaths through our coordination of efforts with the Mississippi Bureau of Narcotics, along with other stakeholders, enhancing our holistic approach as problems arise, such as increased Heroin and Fentanyl abuse and overdoses, etc.

Efficiency: Increase knowledge on a federal, State, and local level of the PMP and its benefits to our citizens.

Explanatory: Providing data to better inform those conducting research and aid first responders in the field

A.1.3. STRATEGY: EARLY INTERVENTION AND PREVENTION

Output: Work with other entities and agencies to place information in doctor's offices and pharmacies to inform the public of the MSPMP initiative to deter doctor shopping and use of prescription drugs for abuse and drug diversion.

Output: Providing an avenue to assist physicians and nurse practitioners in recognizing individuals who are addicted, the need for treatment and available treatment and recovery options

Efficiency: Reducing unnecessary office visits and attempting to decrease drug addiction and misuse

Efficiency: Education of practitioners on pain management will decrease prescribing

A.1.4. STRATEGY: INVESTIGATIONS AND ENFORCEMENT

Output: Continue our efforts to refine the PMP and manage the data retrieved to study trends that relate to the Opioid Crisis

Output: Expand the MS Board of Pharmacy PMP website through the development and expansion of information dedicated to the Opioid & Heroin Crisis

Efficiency: Further educate and inform both practitioners and the general public of the crisis and the issues surrounding it to include solutions and options for treatment and other educational opportunities

Output: Investigations Conducted due to the misuse of the MSPMP

Output: Assisting regulatory boards and law enforcement for investigation of those patients and providers who are breaking the law and using controlled substance prescriptions for profit through illicit activity.

Output: Assuring all dispensers are reporting to the program

Output: Making sure users of the system do not access it in an unauthorized manner and hold accountable those using it out of scope

Efficiency: Maintaining the integrity of the system. Cost to insurance payors and the general public through Government programs reduced

A.1.5. STRATEGY: PROTECTION OF CONFIDENTIALITY

Output: Assuring users understand how and when PMP information can be utilized

Output: Working with Health Information Exchange vendors to ensure all PMP information provided is used within the guidelines of HIPAA and other confidentiality protocols

Efficiency: Ensure PMP information is utilized in the manner for which it was intended

Efficiency: Develop additional features and safeguards to ensure the integrity of personal data and the use of that data

Program 4: Pharmacy Benefit Manager Program (PBM) Division

GOAL A: License and Regulate Pharmacy Benefit Managers (PBMs) that conduct business in the State, renew licenses annually, respond to complaints from citizens and health care providers in order to provide protection for individual Mississippi citizens and allow better patient care and access to pharmacy. (Miss. Code Ann. § 73-21-157)

OBJECTIVE A.1.	IDENTIFY - Ensure all PBMs, with activities in Mississippi, are duly licensed and ensure all statutes and regulations are being followed	
Outcome:	Protect the Health and Safety of the citizens of Mississippi through the emphasis on Patient Access, Care, Safety and Services through Pharmacy	
A.1.1. STRATEGY:	Work with pharmacies and other State entities to analyze operational data specific to pharmacy transactions and their related PBMs	
Output:	Communicate with pharmacies and patients on PBM activity	
Output:	Measure the effects of PBM's changing requirements to pharmacy jobs, small businesses, economic development and the stability of our communities	
Output:	Document PBM activity	
Efficiency:	Cost per PBM license / renewal	
Efficiency:	Ensure PBMs are operating within requirements	

Efficiency: Stability of pharmacy access and services to the citizenry

OBJECTIVE A.2.   COMPLAINTS – Respond to and gather PBM related complaints from citizens and pharmacy healthcare providers

Outcome: Provide a voice to citizens concerning PBM issues

Outcome: Recognize and document issues in a changing health care environment

A.2.1. STRATEGY: Educate and inform pharmacists and patients to utilize this Division to resolve PBM issues

Outputs: Report the number of PBM Licenses Issued

Outputs: Number of Responses to Complaints

Efficiencies: Cost of Operation (program cost divided by the number of total licenses and complaint responses)

Outcomes: Number of complaint responses

Output: Resolve citizen issues through communication with PBMs and Board of Pharmacy action

Efficiency: Reduce limits to pharmacy access and services to the citizens

OBJECTIVE A.3.   EDUCATE AND INFORM the public, pharmacy professionals and leaders

Outcome: Better informed public, pharmacy professionals and leaders concerning changing PBM issues locally and nationally

Outcome: Develop more accurate information as to the effects of PBM changes on the citizenry

A.3.1 STRATEGY: Share data and specific information relating to PBM activity and its effect on the health of Pharmacy in Mississippi

Output: Communicate regularly with local, state and national entities

Output: More clearly define issues, identify problems and develop solutions to changing PBM issues that affect the pharmacy benefits of the citizens

Output: Promulgate the development of laws and regulations relating to PBM activity in Mississippi

Output: Educate pharmacists and State leaders on findings