



# Mississippi Board of Pharmacy

5 – YEAR STRATEGIC PLAN

FOR THE FISCAL YEARS 2018 – 2022

Mississippi Board of Pharmacy (846-00)

July 2016

# 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/or providers and its effect on access to pharmacy and Freedom of Choice in pharmacy for;
- ‘Under Cost Reimbursement’ to Mississippi’s small business community pharmacies and its effect on the health of the Mississippi Pharmacy community;
- 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 to operate a fair and effective system of justice”*

Relevant Benchmarks #2.: EMERGENCY 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 stake holder agencies, organizations and law enforcement in the battle against Prescription Drug Abuse and Diversion using the MS Prescription Monitoring Program (MSPMP);

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.:

- *“Number of health professional shortage areas”*

- 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;

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);*
- Full implementation of the upgraded Mississippi Board of Pharmacy Licensing Software System - including online renewals;
- 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;

#### **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 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 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. Compliance Officers are assigned specific regions of the State to conduct inspections and to conduct investigations as necessary.

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 by means of personal contact by agents of the Board and by means of newsletters, email or other correspondence. The Compliance Division serves as an information source for consumers, licensees, registrants and state and federal law enforcement and regulatory agencies.

## **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 wholesalers, home/health hospices, nursing homes, out-of-state wholesalers, mail-order pharmacies, and durable medical equipment suppliers are issued licenses, permits and/or registrations. The number of licenses and registrations issued exceeds 20,000 annually.

The majority of the operational funds for the Board are generated from fees received from the issuance and renewal of licenses, permits and registrations. The Licensing Division provides information regarding licensure, permitting and verification.

The new eLicense software is now live, functioning and conversion is complete. This complex licensing software has moved the Board of Pharmacy to a much higher level of service and information access.

## **Mississippi Prescription Monitoring Program (MSPMP) Division**

The MSPMP monitors the dispensing of schedule II-V controlled substances plus additional drugs specified by the state such as ephedrine, pseudoephedrine and butalbital prescribed to patients in Mississippi. 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 a patient's controlled substance dispensing profile 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. Initially with a goal to conduct 15 training sessions annually, other efforts and relationships we have developed have produced increased opportunities for us. We have doubled our goal to 30 and are aggressively pursuing this target. The third objective of the MSPMP is to educate all sectors of the public relating to the dangers, laws and citizen responsibilities relating to control substance prescriptions, doctor shopping and prescription drug abuse. Our approach to educating the public is founded in a holistic approach that covers all sectors of the state's population from youth to the elderly.

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 share data and to fully utilize the MSPMP Advisory Committee for the most effective use of data, the extraction of data to conduct detailed data analysis, and to provide the Department of Health and other entities with non-identifying statistical data for research and educational purposes in order to better 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 also to renew the licenses annually. The PBM Division also is charged with collecting, cataloging and/or responding to complaints received from citizens and health care providers in order 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 especially prescription drug services to our citizens. The domino effect of what can be perceived to be a small and inconsequential change at first; can many times grow to negatively impact our citizens in Mississippi. 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 680 out of state or nonresident Mail Order Pharmacies. We have recently 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 additional have a negative impact on 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.

## **HMPSC – Health, Medical & Pharmaceutical Support Center**

After 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 is working closely with the Department of Public Protection in the development of this disaster support center.

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. All of these activities must be coordinated by the Mississippi Board of Pharmacy 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 has, even recently, (Louisville Tornado Disaster) been actively involved in state disaster response, recovery efforts and planning. Our efforts in this area of our responsibility are intended to maximize our efficiencies and capabilities in protecting the Public Safety, Order and Health during and after a disaster.

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

- 1) Changes in State or Federal laws
- 2) Enhancement of 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.
- 3) Online renewal capability is a crucial step in becoming more efficient.
- 4) Economic or catastrophic conditions that relate to the healthcare of the citizens of the State of Mississippi



- 5) Full implementation of the Health, Medical and Pharmaceutical Disaster Support Center (HMPSC) is vital to our fulfillment of our obligation to the public in Disaster Support and Response.
- 6) Continued manipulation of pharmacy services by PBMs can be detrimental to the citizen's access to Pharmaceutical Services.
- 7) 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 requested. Financial and procedural advice is obtained through a third party contracted financial consultant. 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), 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 2016 through FY 2020:**

### **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/OR RENEW**

*Outcome:* Process pharmacy technician, student intern/extern controlled substances registration, pharmacists, and facilities permits to those individuals and entities that met minimum requirements

*Outcome:* Review all applications for completeness; process all correspondence, e-mail verification, status requests, e-mail inquiries and telephone status requests; process address and name changes;

*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 average wait time for services

*Outcome:* Increase accuracy in processing and documenting

*Outcome:* Save State dollars by increasing productivity through providing renewals 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

*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** Continue the enhancement and improvement of the eLicensing software system

*Output:* Regular planning meeting with software provider for enhancements

*Efficiency:* State dollars saved through increased productivity

## **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 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 Pharmacy Practice Act and Pharmacy Board 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:* Information source for consumers, licensees, registrants, permittees and State and Federal regulatory and law enforcement agencies regarding compliance with applicable Pharmacy Board 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:* Preparation and issuance of Notices of Hearing and Complaint for violation of Board Regulations and Pharmacy Practice Act on 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

*Efficiency:* Average cost per facility inspected

**A.1.2. STRATEGY:** Conduct investigations as necessary of Pharmacists, Pharmacies, Pharmacy Technicians and other pharmacy 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)

### **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 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 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:* Put in place videos, presentations, and/or pamphlets in grade schools starting in elementary school and changing strategies as grades and ages increase

*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 Law Enforcement to inform and educate pharmacy and 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 children 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 Physicians Registered to the MSPMP (%)

*Outcomes:* Licensed APRNs Registered to the MSPMP (%)

**A.1.2. STRATEGY: PUBLIC HEALTH INITIATIVES**

- Output:* Providing de-identified information for research in areas that affect the 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:* Collaborate on the use of Nalaxone for first responders to possibly prevent overdose
- Output:* Utilize the PMP Advisory Committee for continued advice and support
- Efficiency:* Increase knowledge of drugs used and abused in an attempt to decrease overdose deaths through our coordination of efforts with the Mississippi Bureau of Narcotics enhancing our holistic approach as problems arise, such as increased Heroin 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 in recognizing individuals who are addicted and need treatment



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

*Efficiency:* Education of doctors on pain management will decrease prescribing

#### **A.1.4. STRATEGY: INVESTIGATIONS AND ENFORCEMENT**

*Output:* Investigations Conducted due to the misuse of the MSPMP

*Output:* Providing assistance to 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 take action against 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 insure 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 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 health care providers

*Outcome:* Provide a voice to citizens concerning PBM issues

*Outcome:* Recognize and document issues in a hanging 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 number of total licenses and complaint responses)

*Outcomes:* Number of complaint responses

*Output:* Resolve citizen issues through communication with PBMs and/or 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