

Minnesota Privacy and Security Project

Variations Working Group

Scenario #9 – PBM Scenario A

Scenario

Pharmacy Benefit

The Pharmacy Benefit Manager (PBM) has a mail order pharmacy and also has a closed formulary. The PBM receives a prescription from Patient X for the antipsychotic medication Geodon. The PBM's preferred alternatives for antipsychotics are Risperidone (Risperdal), Quetiapine (Seroquel), and Aripiprazole (Abilify). Since Geodon is not on the preferred alternatives list, the PBM sends a request to the prescribing physician to complete a prior authorization in order to fill and pay for the Geodon prescription. The PBM is in a different state than the provider's Outpatient Clinic.

Key Issues

- ePrescribing

Most Likely Privacy and Security Domains

- Domain #3 - Patient and provider identification to match identities across multiple information systems and locate electronic personal health information across enterprises.
- Domain #4 – Information transmission security or exchange protocols (encryption, etc.) for information that is being exchanged over an electronic communications network.
- Domain #5 - Information protections so that electronic personal health information cannot be improperly modified.
- Domain #6 - Information audits that record and monitor the activity of health information systems.
- Domain #8 - State law restrictions about information types and classes, and the solutions by which electronic personal health information can be viewed and exchanged.

Questions For Consideration

1. What is the information flow of prescription data today? Do you exchange any prescription data electronically?
2. When you send a prescription (electronically, fax, call-in, or written) and the pharmacy discovers the drug you requested is not on the patient's formulary, what occurs? How is the physician's office involved in this flow?
3. What barriers exist today for making these transactions more electronic?
4. Are there any links between the EHR and the payer's formulary?
5. What if the prescription were for a proprietary drug the pharmacy did not have, could the pharmacy fill the prescription with a generic substitute and whose approval would it need in Minnesota?
6. What are the key intersections and issues between the Privacy and Security Domains (see above) and the scenario, including the variations on the scenario in these questions?