



## **Prescription Monitoring Program**

### **Client Agency**

Ohio State Board of Pharmacy

### **Participating IJIS Institute Staff**

Scott Serich, Ph.D., Senior Project Manager

### **Participating IJIS Institute Consultants and Firms**

Jim Cabral, Senior Manager, MTG Management Consulting

Shared Rao, President and CEO, Tetras Consulting Group

### **Dates Services Provided**

July 7 – November 1, 2010

### **Overview of Technology Assistance Request**

The Ohio State Board of Pharmacy (OSBP) operates the Ohio Automated Rx Reporting System (OARRS) Prescription Monitoring Program (PMP). OARRS houses a large database containing protected health information (PHI). The OSBP requires its licensed pharmacies to report specific prescription data to OARRS at least weekly. The system then provides an individual's PHI to healthcare professionals who are treating the patient or to law enforcement officials investigating the individual. All data into and out of OARRS is transmitted electronically through a secure web site.

In 2009, a PMP system in another state experienced a security breach, the cause and extent of which has not yet been made public (if it has ever been identified). Due to the concerns raised from this incident, the OSBP wished to determine whether its PMP security measures were adequate or whether changes would be required.

The OSBP requested assistance from the Bureau of Justice Assistance (BJA)/IJIS Institute Technical Assistance (TA) program to address any potential security issues surrounding its PMP and to assist in developing a plan to enhance the security, as needed. The requested assistance included, but was not limited to:

- Assessment of the OARRS Network
- Assessment of OARRS policies
- Recommendations for increased security

A TA Questionnaire was first completed and reviewed and subsequently a Letter of Agreement (LOA) was negotiated jointly authorizing the TA engagement. As defined by the LOA, the primary goal of this TA engagement was to assist the OSBP in conducting a security assessment by performing a review of OARRS. This review would help the OSBP answer the following questions:

- Do the current policies promote a secure environment?
- Do the current processes introduce any unintended vulnerabilities?
- Does the OSBP have the necessary tools to ensure a secure network to detect an intrusion?



## **Type of Technology Assistance Services Provided**

The IJIS Institute provided a team of experts in justice and public safety system integration, network design and IT security practices. These consultants represented a consortium of IJIS Institute member companies and alliance partners that possess the required experience and expertise in justice and public safety domains, relevant technologies and product sets, and the applicable information sharing standards and capabilities.

The TA Team conducted a series of interviews and phone calls with the OSBP team and had some follow up calls with the company that developed the software utilized by OARRS and a PMP manager from another state.

Specific activities that were performed by the TA Team included:

- Problem Definition and Boundary Specification:
  - A review of the goals and objectives of the project
  - A review and definition of the boundaries of the OARRS system
  - Development of the framework and methodology to perform the risk assessment of PMP systems
- Current Situation Assessment :
  - Gather information and documentation on current manner in which vulnerabilities and handled at the hardware and network level as well as the application and data level
  - Identify threats, vulnerabilities and controls based on the current environment
- Risk Analysis:
  - Determine likelihood of a potential vulnerability being exploited by a threat
  - Determine the impact in the event of a vulnerability is exploited by a threat
  - Determine the level of risk to the system
- Recommendations:
  - Develop general recommendations and next step
- Actions and Initiatives:
  - Define major initiatives
  - Prioritize actions to be taken
- The Key Scheduled Events and Respective Dates that were Agreed to are, as Follows:
  - Consultant selection by the IJIS Institute: 7/7/2010
  - Preparatory materials provided by clients to the IJIS Institute: 7/7/2010
  - Conference calls with client: 7/13, 8/9, 8/17, 8/19 and 11/1/2010
  - Report development and final submission:
    - Draft Report to client for review/comment: 9/24/2010
    - Draft Report to BJA for review/comment (public version) date to be determined
    - Final Report (client version): 12/22/2010

The IJIS Institute team conducted this engagement as a remote engagement, followed by an analysis by the consultant team, and the generation of a TA report, providing the OSBP with a recommended set of potential controls for the OARRS system.



## **Overview of Observations and Recommendations**

Contents of the Findings and Recommendations Section have been removed for client security purposes. The reader is invited to contact the OSBP (<http://pharmacy.ohio.gov/>) for additional information.

### **Contact Information:**

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