

PRIME Future State

Frequently Asked Questions

The Ministry of Health launched the PRIME (PharmaNet Revisions for Information Management Enhancements) project to address issues around PharmaNet user management, including:

- increased demand for access to PharmaNet;
- a need for individual accountability for access to PharmaNet; and
- improving the PharmaNet safeguards British Columbians expect, to protect their health information.

PRIME will also meet requirements of legislation and government standards for privacy, information security, and identity assurance.

PRIME will affect PharmaNet users across the province, as well as the organizations they work for, including Health Authorities, pharmacies, and community practices. The effects of PRIME will range from changes in day-to-day processes of enrolment and access renewal, and the introduction of a new web-based enrolment and user management system, to a greater focus on educating users about their responsibilities regarding information security and appropriate access.

The PRIME Project Team hosts ongoing sessions with stakeholders across the health sector to discuss the future state of PRIME. The questions and feedback heard, and the responses from the PRIME team, are compiled in this document, which is updated periodically.

September 2018 Update: Based on the feedback from stakeholders, the verifier role has been removed from PRIME. In the new enrolment process, PharmaNet users will apply for PharmaNet access by associating themselves to the appropriate organizations and be provisioned PharmaNet access at specific sites. Some answers below have been adjusted to reflect this change and new information.

BACKGROUND

1. [What is PRIME?](#)
2. [Why is the PRIME project necessary?](#)
3. [What are the benefits of PRIME?](#)
4. [What are the guiding principles of PRIME?](#)
5. [Why is PharmaNet access and information treated differently than other health information?](#)
6. [When will PRIME come into effect?](#)

PHARMANET USERS

7. [What is a Regulated User and an On-Behalf-of User?](#)
8. [What is a Device Provider? Do they have access to PharmaNet?](#)
9. [Do On-Behalf-of users need to have their own access to PharmaNet? Do they need to enrol in PRIME?](#)

10. What about regulated or licensed practitioners who do not currently have access to PharmaNet under their own licence (e.g. midwives, dentists, pharmacy technicians, nurses)?
11. **UPDATED** Do temporary staff (e.g. agency nurses, locums, visiting specialists) need their own PharmaNet access?

VERIFIERS AND PROVISIONERS

Update: Based on the feedback from stakeholders, the verifier role has been removed from PRIME.

12. **UPDATED** What is the verifier's responsibility?
13. **UPDATED** Who should the verifier for my site be?
14. **UPDATED** What is the provisioner's responsibility?
15. Can many users be batch-approved at once, as part of confirming the provisioning in PRIME?
16. Who should the provisioner for a site be?
17. Can my software provider be the provisioner for a site?
18. **UPDATED** How many verifiers and provisioners should there be for each site?
19. **UPDATED** Can someone be a verifier or provisioner for more than one site?
20. **UPDATED** Can someone be a verifier at one site, but an applicant at another?
21. **UPDATED** Will a user who is both a verifier and a provisioner have multiple PRIME accounts?
22. **UPDATED** Can someone be both a verifier and a provisioner for the same site?
23. **UPDATED** Can a verifier or provisioner verify or provision their own PharmaNet application?
24. **UPDATED** Does the verifier have to be a PharmaNet user or can it be just an admin role?
25. Will PRIME affect the relationship/contract with a software provider?
26. **UPDATED** What if there are not enough people at my site to act as verifier and provisioner?
27. **UPDATED** How are verifiers and provisioners maintained for a site, especially at large sites with high turnover?
28. **UPDATED** Will verifiers and provisioners require training?
29. **UPDATED** How many sites can a verifier oversee?

PROCESS

30. **UPDATED** How will the PRIME enrolment model work?
31. What if an applicant is not approved for access to PharmaNet?
32. What might cause an application to require manual review by the Ministry?
33. **UPDATED** How long will the enrolment process take?
34. Can a PharmaNet user get PharmaNet access within 24 hours?
35. **UPDATED** What if a user requires PharmaNet access immediately or with little advance notice?
36. **UPDATED** Can a PharmaNet user complete their application from outside the facility/organization?
37. **UPDATED** How can a user update their information or access?

38. **UPDATED** How will access be removed?
39. **UPDATED** Can many users be enrolled at once (batch enrolment)?

SITES AND SITE COLLECTIONS

40. **UPDATED** What is a site and how is it different than an organization?
41. **UPDATED** What is a site collection?
42. **UPDATED** Does a PharmaNet user have to be enrolled to each site they will be working at, one by one?
43. How will sites be set up in PRIME in an orderly fashion?
44. **UPDATED** Can a user apply for access to more than one site at a time?
45. **UPDATED** What about staff who move between sites regularly?

OTHER

46. **UPDATED** Once granted, is access permanent?
47. Can I access PharmaNet remotely?
48. Why does a practice need to pay for PharmaNet access?
49. How does PRIME affect current PharmaNet access and permissions?
50. What happens to PharmaNet access when the PRIME renewal date comes up?
51. Is the Ministry considering coordinating with colleges to verify the applicant's information?
52. Will students get their own PharmaNet access?
53. Who has been consulted about PRIME?
54. What about access to PharmaNet for other purposes (e.g. research, evaluation, external monitoring)?

Background

1. What is PRIME?

PRIME (PharmaNet Revisions for Information Management Enhancements) is a Ministry of Health project to create a robust user management system for PharmaNet.

Currently, PharmaNet access is administered inconsistently by many disparate parties across the health sector, and the Ministry is reliant on third parties for information about who is accessing this government system. PRIME will create a single solution for PharmaNet access and position the Ministry as the body that approves, determines, and manages a person's access.

PRIME is an enrolment and user management system; it is not a software offering for accessing PharmaNet. PRIME will not replace current point-of-service PharmaNet access software.

2. Why is the PRIME project necessary?

PharmaNet is a critical part of British Columbia's health care system, and the demand for access to PharmaNet is constantly increasing. PRIME is necessary for the following reasons:

- To ensure consistent, efficient access provisioning to PharmaNet across all clinical users;
- To improve security, transparency, and individual user accountability;
- To facilitate access monitoring and audit capabilities;
- To align PharmaNet user management and information privacy and security with government standards and best practice;
- To aid in prevention of unnecessary or inappropriate PharmaNet use;
- To satisfy legislated requirements of the Information Management Regulation under the *Pharmaceutical Services Act*, enacted in 2015, including:
 - The Ministry of Health determines the criteria for access to PharmaNet
 - The Ministry of Health approves and grants access to PharmaNet
 - The Ministry of Health monitors and audits PharmaNet access. The Ministry of Health may restrict, suspend, or terminate PharmaNet access

3. What are the benefits of PRIME?

The PRIME system will offer the following benefits:

- Access to PharmaNet that is aligned with applicable legislation, government standards and strategic direction
- Individual accountability for access to PharmaNet
- Increased security and privacy of personal information in PharmaNet, preventing inappropriate access to PharmaNet and security breaches that put patient and practitioner information at risk

- A consistent reporting of the access provisioning for all PharmaNet users and administrators across the province
- Clearly defined criteria for access to PharmaNet
- A web-based, mostly automated system that allows for streamlined request processing

4. What are the guiding principles of PRIME?

PRIME is being developed within the framework of a few guiding principles:

1. Protect Patient Care
 - Contribute positively to patient care delivery
 - Safeguard appropriate use of PharmaNet related to patient care
2. Improve Privacy and Security
 - Allow for ongoing monitoring and audit, integral to information security and personal accountability for PharmaNet access
 - Achieve a high level of confidence in the identity of PharmaNet users
 - Improve reporting, monitoring, and audit
 - Address recommendations from recent PharmaNet security reviews
 - Increase business intelligence and reduce reliance on external data
3. Foster Sector Partnership
 - Where possible, provide an automated, streamlined enrolment process
 - Deliver a solution based on collaboration with health sector stakeholders
 - Contribute to and promote Sector Identity and Access Management (IDAM) solutions
4. Align with Policy
 - Strengthen Ministry accountability for granting access and use of information
 - Adhere to information management regulations and core policy, including:
 - Establishes a direct relationship between the PharmaNet user and the Ministry
 - Ensures individuals are accountable for their access to and use of PharmaNet
 - Ensures the Ministry of Health validates user information, determines if the user should have PharmaNet access, and what kind of access they should have

5. Why is PharmaNet access and information treated differently than other health information?

Different legislation governs different kinds of health information. Each piece of legislation prescribes different criteria for access to and appropriate use of specific kinds of health information. For example:

Information System	Governing Legislation
PharmaNet	<ul style="list-style-type: none"> • <u>Pharmaceutical Services Act</u> • <u>Information Management Regulation</u> • <u>Freedom of Information and Protection of Privacy Act</u>
PLIS, EMPI, and Provider Registry	<ul style="list-style-type: none"> • <u>E-Health Act</u> • <u>Freedom of Information and Protection of Privacy Act</u>
EMR in private practices and pharmacies	<ul style="list-style-type: none"> • <u>Personal Information Protection Act</u>
EMR information in health authority facilities	<ul style="list-style-type: none"> • <u>Freedom of Information and Protection of Privacy Act</u>
MSP	<ul style="list-style-type: none"> • <u>Medicare Protection Act</u> • <u>Freedom of Information and Protection of Privacy Act</u>

Additionally, PharmaNet is not just a health information system that supports clinical care or a data repository. PharmaNet is also the operating system of PharmaCare, the provincial public drug plan. This introduces different requirements for information management.

6. When will PRIME come into effect?

The effective date of PRIME is legislated in the Information Management Regulation, which specifies two dates:

- As of December 1, 2020, applicants without existing PharmaNet access must enrol using PRIME.
 - On December 1, 2020, anyone who already has PharmaNet access will have that access grandfathered until they are required to enrol using PRIME.
- Before April 1, 2022, all users who had their access grandfathered will be required to enrol using PRIME. This will be done gradually, and the Ministry will provide ample notice of when existing users are required to enrol using PRIME.

PharmaNet Users

7. What is a Regulated User and an On-Behalf-of User?

- A Regulated User is a PharmaNet user who is a member of a profession regulated under the Health Professions Act and listed in the Information Management Regulation. Currently, that includes pharmacists, medical practitioners, and nurse practitioners.
- An On-Behalf-of User is someone who accesses PharmaNet on behalf of a Regulated User in order to support that Regulated User's provision of direct patient care. A pharmacist, physician, or nurse practitioner cannot be an On-Behalf-of User.

8. What is a Device Provider? Do they have access to PharmaNet?

A Device Provider is enrolled in the device provider class, and associated sub-classes, under the [Pharmaceutical Services Act, Provider Regulation](#). Connection to PharmaNet for device providers is not mandatory. A Device Provider's access to PharmaNet is available to submit online claims. Device Providers do not have access to the patient's full drug profile.

9. Do On-Behalf-of users need to have their own access to PharmaNet? Do they need to enrol in PRIME?

Yes, On-Behalf-of users need to have their own access to PharmaNet. For On-Behalf-of users, the transaction in PharmaNet will be transmitted with the Practitioner ID of the Regulated User that they are accessing for, but that transaction will also be connected to the On-Behalf-of User's unique ID. This way, the Ministry can track the individual accessing PharmaNet and their activity, as well as the practitioner they are accessing on behalf of, for the purposes of monitoring and auditing. Each user is accountable for their access and activity in PharmaNet, and responsible for acknowledging their own terms of use.

Yes, every person who intends to access PharmaNet must register and enrol in PRIME, and have their own login credentials, even if they are accessing on behalf of someone else.

10. What about regulated or licensed practitioners who do not currently have access to PharmaNet under their own licence (e.g. midwives, dentists, pharmacy technicians, nurses)?

Currently only physicians, nurse practitioners and pharmacists are named in the Information Management Regulation as Regulated Users who can access PharmaNet as part of providing direct patient care to their patients. All other users must access as On-Behalf-of users.

The Ministry recognizes the need for other kinds of practitioners to be able to access PharmaNet as Regulated Users. This requires changes to the Information Management Regulation, and is a longer-term strategy consideration for access to health information. PRIME provides the administrative capacity necessary to effectively manage large numbers of new PharmaNet users.

11. ^{UPDATED} Do temporary staff (e.g. agency nurses, locums, visiting specialists) need their own PharmaNet access?

Yes. All staff, permanent or temporary, who require access to PharmaNet at an organization must be enrolled for access at that organization (e.g. Health Authority, private clinic).

Locums, agency nurses, and other individuals who frequently and unpredictably change location should all be registered and enrolled in PRIME. Temporary staff may be end-dated in PRIME by a provisioner or by themselves so their access at the organization and/or sites will be cancelled automatically.

The organization responsible for the site will be responsible for confirming the necessity of PharmaNet access from that site for all PharmaNet users, regardless of who is employing those users, or for how long they will be working at the site.

Verifiers and Provisioners

The PRIME Project Team continuously engages with stakeholders and reviews the design to provide an optimized solution. Based on the feedback from stakeholders, the verifier role has been removed from the PRIME system and processes.

12. **UPDATED** What is the verifier's responsibility?

Based on the feedback from stakeholders, the verifier role has been removed from PRIME.

13. **UPDATED** Who should the verifier for my site be?

Based on the feedback from stakeholders, the verifier role has been removed from PRIME.

14. **UPDATED** What is the provisioner's responsibility?

The provisioner is the designated person for an organization/site, who:

- Is authorized to act as a provisioner to the local PharmaNet access software
- Is registered and enrolled in PRIME
- Creates the end user's user ID and password for the local PharmaNet access software when a provisioning request is received outside of PRIME
- Uses PRIME to:
 - Confirm the user has been approved by the Ministry
 - Confirm the access privileges granted by the Ministry
 - Record the local user ID and the sites at which the user is provisioned for PharmaNet access

15. **Can many users be batch-approved at once, as part of confirming the provisioning in PRIME?**

No. PRIME requires the provisioner to record the local user ID(s) for the users at each site. The provisioner may choose to do this for many users, one at a time, for each site. The provisioner may also record the local user ID(s) in PRIME for many sites, one at a time, for each user.

16. **Who should the provisioner for a site be?**

The provisioner can be anyone designated for that site who can perform the actions detailed in #14.

The provisioner must be able to create user accounts in the local PharmaNet access software.

The provisioner for your site may be your software provider's customer service department, a pharmacy manager, a centralized IT team, or anyone else in your organization who can fulfill the role. PRIME is unlikely to change who is currently performing this role in your organization.

The Ministry will work with each organization to help identify the provisioner(s) for that organization and/or site.

17. Can my software provider be the provisioner for a site?

Yes, your software provider can be your designated provisioner. They will register and enrol in PRIME and will act as any other provisioner.

Instead of a single, designated person, your software provider may have a team designated as the provisioner for your site. Every member of the team must register and enrol individually in PRIME; they will be identifiable and accountable for their own activity.

18. ^{UPDATED} How many verifiers and provisioners should there be for each site?

Based on the feedback from stakeholders, the verifier role has been removed from PRIME.

The number of provisioners for each site is dependent on what is best for each site. The Ministry encourages sites to have more than one provisioner, where possible, to provide coverage and minimize the risk of delays in the enrolment process. There is no limit to the number of provisioners for each site.

The Ministry will work with each organization to help identify the provisioner(s) for that organization and/or site. When PharmaNet sites are set up in future, the organization will need to identify the associated provisioners before the site will be available for user enrolment.

19. ^{UPDATED} Can someone be a verifier or provisioner for more than one site?

Based on the feedback from stakeholders, the verifier role has been removed from PRIME.

Yes, a person can be a provisioner for more than one site, as long as they are able to perform the functions detailed in #14 for each site.

20. ^{UPDATED} Can someone be a verifier at one site, but an applicant at another?

Based on the feedback from stakeholders, the verifier role has been removed from PRIME.

21. ^{UPDATED} If someone has more than one role in PRIME, will they have multiple PRIME accounts?

Based on the feedback from stakeholders, there are now only two roles: applicant and provisioner. A person will have a single PRIME account, even if they have more than one role in PRIME. Their PRIME privileges will differ based on their PRIME role(s).

22. ^{UPDATED} Can someone be both a verifier and a provisioner for the same site?

Based on the feedback from stakeholders, the verifier role has been removed from PRIME.

23. ^{UPDATED} Can a verifier or provisioner verify or provision their own PharmaNet application?

Based on the feedback from stakeholders, the verifier role has been removed from PRIME.

A provisioner may provision their own PharmaNet application once it is approved. In this case, their application will go through a manual review by the Ministry.

24. ^{UPDATED} Does the verifier have to be a PharmaNet user or can it be just an admin role?

Based on the feedback from stakeholders, the verifier role has been removed from PRIME.

25. Will PRIME affect the relationship/contract with a software provider?

The Ministry cannot say with certainty that PRIME will not affect your current contract with your software provider; as the content of those contracts is not typically disclosed to the Ministry.

PRIME is being designed with a respect for existing processes and an intention to minimize the impact of new requirements when possible.

26. ^{UPDATED} What if there are not enough people at my site to act as verifier and provisioner?

Based on the feedback from stakeholders, the verifier role has been removed from PRIME.

The Ministry will work with each organization to associate the appropriate provisioners to the organization and/or site(s). If there are only a very few individuals at an organization (e.g., a one-practitioner or one-pharmacist location) the Ministry will work with them to fill the necessary PRIME roles.

27. ^{UPDATED} How are verifiers and provisioners maintained for a site, especially at large sites with high turnover?

Based on the feedback from stakeholders, the verifier role has been removed from PRIME.

Someone responsible for provisioning at each organization will maintain a list of provisioners for a site and ensure provisioners enrol in PRIME. For example, if the software provider is the designated provisioner for a site, and if there is a team of provisioners, a specific individual who works for the software provider will be responsible for maintaining the list of provisioners.

The Ministry will work with each organization to identify the individual responsible for maintaining the provisioner(s) for that organization and/or site.

28. ^{UPDATED} Will verifiers and provisioners require training?

Based on the feedback from stakeholders, the verifier role has been removed from PRIME.

Yes. Provisioners will be required to complete quick, simple training on how to use PRIME and what their responsibilities are in provisioning PharmaNet access.

29. ^{UPDATED} How many sites can a verifier oversee?

Based on the feedback from stakeholders, the verifier role has been removed from PRIME.

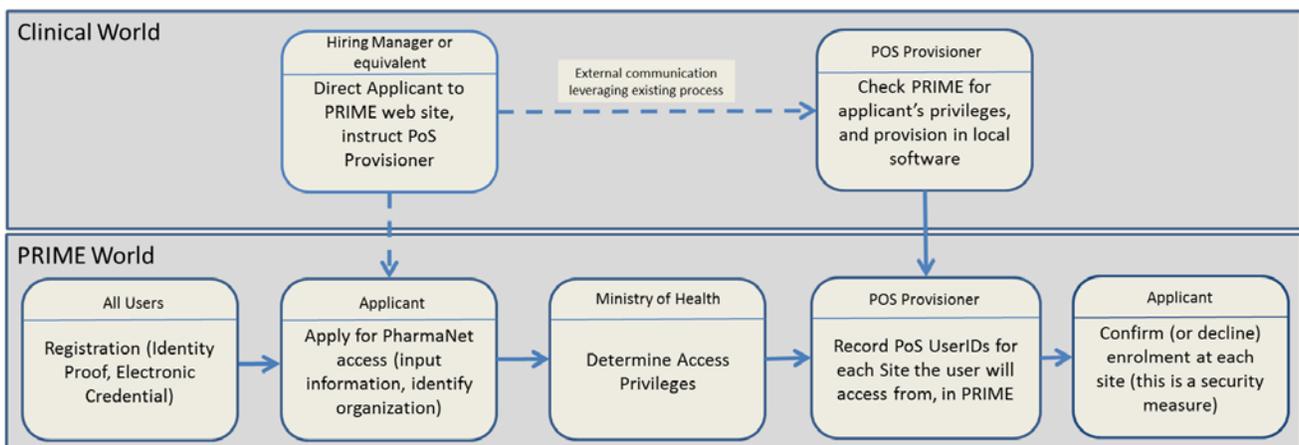
Process

30. **UPDATED** How will the PRIME enrolment process work?

Note: For a user to enrol, that user MUST be registered in PRIME. Registration is a one-time process initiated by the PharmaNet user that can happen at any time in preparation for PharmaNet access. This includes creating a PRIME account, validating the user's identity, and establishing two-factor authentication, such as a software application or hardware token. Once PRIME is fully operational, a PRIME account will be a de facto condition of any employment or position that requires PharmaNet access.

Based on the feedback from stakeholders, the verifier role has been removed from PRIME. In the revised PRIME enrolment process, the PharmaNet user will initiate their own application for access to PharmaNet.

If someone requires access to PharmaNet, the process is:



- For enrolment, the PharmaNet user is directed to PRIME by someone in the organization who does the onboarding. At the same time, the site's designated provisioner will receive a provisioning request from the existing onboarding process. The provisioning request will include information about the site(s) to provision the user at.
- The PharmaNet user logs in to PRIME to input additional information (like their professional information, etc.), attest to the information they have provided, select the organization for which they work, and submit the application.
- PRIME automatically processes the application against the system decision rules, and provides a preliminary user class assignment (or in exceptional cases, routes the application for manual review by the Ministry).
- If access is approved, the provisioner can find the user in PRIME and the access privileges that were granted by the Ministry.
- The provisioner creates the user's account in the local software and provisions the user with the access privileges that were granted by the Ministry.
- The provisioner uses PRIME to record the user ID assigned to that user at each site requested by the local onboarding process, and to record the site information (e.g., pharmacy ID or pharmacy equivalency code).

- PRIME informs the user of their user ID(s). In PRIME, the user confirms (or declines) their enrolment at each site and agrees to the terms and conditions of access. The user can view their access privileges at each site they need PharmaNet access.
- The new user can now access PharmaNet at each site that was requested by the local onboarding process.

Users must not access PharmaNet until the PRIME enrolment process is complete.

31. What if an applicant is not approved for access to PharmaNet?

If an applicant is denied access to PharmaNet, or if limits and conditions are applied to their access, they will be notified by the Ministry. They will be given an opportunity to respond in writing, after which the Ministry may uphold or change its decision.

32. What might cause an application to require manual review by the Ministry?

Most PharmaNet applications will be uncomplicated and will not require a manual review.

A few applications may require manual review; for example, if the provided professional licence number does not match the information we get from the licensing college, etc.

PharmaNet users who have a history of information management or billing infractions may require manual review; this does not mean that the Ministry will necessarily deny access, only that the Ministry must review the information provided and make a decision based on this additional information.

33. UPDATED How long will the enrolment process take?

Based on the feedback from stakeholders, the verifier role has been removed from PRIME.

How long an application takes to process will depend on:

- How quickly the local onboarding process takes place
- Whether the PharmaNet user has registered and how quickly they come back in to PRIME to confirm the provisioning and agree to the terms of use
- Whether the provisioner has registered and how quickly they record the user's user ID and sites in PRIME
- Whether a manual review is required. Conversely, if a PharmaNet user or provisioner does not respond immediately (for example, if a software provider is the provisioner and adds the notification to a queue with a 72-hour turnaround time), then the process time will be affected by that timeline.

34. Can a PharmaNet user get PharmaNet access within 24 hours?

Yes, a PharmaNet user can get PharmaNet access within 24 hours. However, it depends on various factors, such as whether the PharmaNet user has registered in PRIME, whether the application needs to go through a manual review, or whether the PharmaNet user and provisioner are readily available.

35. **UPDATED** What if a user requires PharmaNet access immediately or with little advance notice?

PRIME is designed to make adding new users to a site a fast, mostly electronic process.

The addition should be quick if:

- that user has registered already and has an account in PRIME, and
- nothing in their circumstances/information triggers manual review, and
- the provisioner is available to assign the necessary user ID in the local software, and
- the user confirms provisioning was done correctly and signs their terms of access – all without delay

For true emergency situations, the Ministry will have an exception process available through a help desk to provide necessary PharmaNet access.

36. **UPDATED** Can a PharmaNet user complete their application from outside the facility/organization?

Yes. PRIME will be available as a web portal, accessible anywhere.

37. **UPDATED** How can a user update their information or access?

There will be a web portal in PRIME for a user to update their personal and professional information, and request their PharmaNet access to end. If the user needs to update their places of work, for example, if they will be working elsewhere, the change has to be initiated by the local onboarding process.

38. **UPDATED** How will access be removed?

A PharmaNet user can request removal of PharmaNet access at an organization or a site (for example, if they are no longer working at that site).

A provisioner may also remove access at an organization or site for a particular user by entering an end date in PRIME when known at any time. For example, if the provisioning request from the local process specifies that the user will only need access to PharmaNet for a defined period, the provisioner may enter the end date up front. When the end date comes up, the provisioner will be requested to deactivate the PharmaNet user at the organization or site.

The Ministry will monitor usage and deactivate unused accounts. Notification will be provided to the user, so they can respond to the Ministry to confirm whether or not the access is still required.

The Ministry will remove access for accounts that are not renewed (after a period of multiple notifications and inactivation).

The Ministry may also suspend or terminate access as provided for in the [Information Management Regulation](#).

39. **UPDATED** Can many users be enrolled at once (batch enrolment)?

Based on the feedback from stakeholders, the verifier role has been removed from PRIME.

PRIME requires the PharmaNet user's completion of their own application (including the input of personal information, the attestation to information provided, and the agreement to terms and condition of access). This requirement cannot be fulfilled in a batch enrolment.

Sites and Site Collections

40. **UPDATED** What is a site and how is it different than an organization?

A site is a PharmaNet connection point, where users all access PharmaNet with the same software.

There may be multiple PharmaNet sites at a single physical location, if there are multiple software types used or if the location was set up with different connection points. For example, in a single hospital, the pharmacy, ER, and outpatient registration could all be different sites at the same location.

A site is identified in PharmaNet by its Pharmacy ID (PID), or PEC code (pharmacy equivalency code). The Ministry has a list of all PEC codes/sites in the province, and will be working with each site to determine whether it will remain identified as a single site or part of a collection of sites grouped together for easier PRIME administration.

An organization is a point of legal accountability, such as a Health Authority or a private clinic. PharmaNet users will apply for PharmaNet access by associating themselves to the appropriate organizations and be provisioned PharmaNet access at the sites that were requested by the local onboarding process.

41. **UPDATED** What is a site collection?

A site collection is a grouping of sites that a provisioner can create in their own view in PRIME for their convenience. Its purpose is to reflect how PharmaNet users move between sites in their work and make the provisioner's duties in PRIME more efficient.

The Ministry envisions that sites will be grouped together as much as makes sense for the organization and its workforce. For example:

- A private practice or independent community pharmacy may not be part of a group; it is a standalone site with its own provisioner.
- A large chain pharmacy may group all of its sites within a city, with many provisioners, to allow for staff to move between that chain's locations in the city.
- A Health Authority may group all its acute care facilities in a certain geographic area, to support users who work in multiple locations.

42. **UPDATED** Does a PharmaNet user have to be enrolled to each site they will be working at, one by one?

A PharmaNet user will associate themselves to the appropriate organization when enrolling for access to PharmaNet. The user will still be provisioned PharmaNet access at each site in the organization where they need PharmaNet access. Based on the local provisioning request, the appropriate provisioner will record the end user's user IDs and sites in PRIME.

43. How will sites be set up in PRIME in an orderly fashion?

Sites will be set up prior to the rollout of PRIME based on existing information. There will be a process for the addition of new sites after the rollout of PRIME.

44. UPDATED Can a user apply for access to more than one site at a time?

The user applies for access at the organization level in PRIME. However, in the provisioning request, the provisioner will be instructed to provision access for the user at the specific site, or sites, requested.

The user can apply for access to more than one organization at a time.

45. UPDATED What about staff who move between sites regularly?

If staff move between sites regularly, the Ministry expects they will be provisioned for access to PharmaNet at all those sites.

Other

46. **UPDATED** Once granted, is access permanent?

Access to PharmaNet is granted indefinitely, assuming circumstances do not change; however, the Ministry will require each user to renew their PRIME account annually. This will be a simple process using the PRIME web application, and users will receive multiple notices before their renewal date.

If a user fails to renew their enrolment, their access to PharmaNet will be deactivated and then terminated after additional notifications.

For users who are on a temporary assignment, access to PharmaNet at the specific site(s) requested will be granted for a defined period. Once the end date comes up, the provisioner will be requested to remove PharmaNet access for the user at the site(s) where they no longer need PharmaNet access.

If a user's circumstances change so that they are no longer delivering direct patient care requiring access to individuals' PharmaNet records, their access to PharmaNet will end.

47. Can PharmaNet be accessed remotely?

Remote access (access from personal devices or outside of an approved physical PharmaNet connection site) is not in scope for the PRIME project. Being able to link a user to the site where they are accessing PharmaNet and the site(s) where they are enrolled to access PharmaNet from is an integral part of the monitoring and security audit aspect of PRIME.

Many practitioners and organizations have identified remote access as a requirement as the workforce becomes more mobile and practice models evolve. The Ministry recognizes that remote access is an increasingly important feature of information access and will consider remote access as part of a longer-term access to health information strategy.

48. Why does a practice need to pay for PharmaNet access?

After the development of PharmaNet in 1995, the Ministry opened the market to software vendors to create a variety of software interfaces for pharmacy, community practice, and hospital access to PharmaNet. The Ministry was not positioned to offer different types of users the kind of specialized software interface required for different kinds of practice. Instead, the Ministry's approach was to create a standard set of basic requirements (the software conformance standards) common to all software vendors. This direction was intended to allow users and their software vendors to develop together the best possible interface for each category of users' needs.

The Ministry does not charge software vendors for accessing the PharmaNet system. The costs paid by practitioners are charged by the vendors, and may vary between different software offerings. Currently, the Ministry does not have plans to compensate PharmaNet users for these fees, nor to create a no-cost software option that is administered by the Ministry.

Ministry staff have noted the concerns expressed by practitioners and will ensure that the issue is considered during strategic discussions regarding the PharmaNet portfolio; however, the issue is not under consideration as part of the PRIME project.

The Ministry is committed to working towards an integrated future solution for information access that supports our health care system. Your participation with projects like PRIME and in discussions with the Ministry will help guide the development of this more integrated future state.

49. How does PRIME affect current PharmaNet access and permissions?

Being enrolled through PRIME will not change current permissions in PharmaNet, for the majority of PharmaNet users, but there may be exceptional cases. You will be informed of your PharmaNet access privileges in PRIME.

50. What happens to PharmaNet access when the PRIME renewal date comes up?

The PharmaNet user will be notified several times to renew in PRIME, which includes reviewing their information and acknowledging the terms and conditions for access to PharmaNet. There will be a period of time where the PharmaNet user can renew their PRIME access without any penalty. After this time period ends, if renewal has not been completed, there will be instructions to the provisioner to remove the PharmaNet user from the local software. They will no longer have access to PharmaNet. Once this happens, the user will need to re-enroll to continue access.

51. Is the Ministry considering coordinating with colleges to verify the PharmaNet user's information?

The Ministry is considering leveraging other sources to confirm the PharmaNet user's professional information in future releases.

52. Will students get their own PharmaNet access?

Students who are providing direct patient care are required to enrol in PRIME and will have the same standing as the profession they are students of, based on their professional licence. For example, students licensed by a regulatory body listed in the IM Regulation, such as a pharmacy student, are handled like a Regulated User.

53. Who has been consulted about PRIME?

The PRIME team began engaging with representatives from across the health sector in the fall of 2016. Since then, more representatives have been included in consultations, and our stakeholder engagement efforts have become increasingly central to the development of PRIME. Stakeholders have been consulted at every stage of development, and their comments and feedback have informed the next stage, in an iterative development process. The PRIME team gains a stronger understanding of stakeholder needs and system requirements with every engagement.

We have had information and discussion sessions with representatives from:

- British Columbia Pharmacy Association
- Chain Pharmacies
- College of Pharmacists of British Columbia
- College of Physicians and Surgeons of British Columbia

- College of Registered Nurses of British Columbia
- Community Pharmacies
- Doctors of BC
- First Nations Health Authority
- Fraser Health Authority
- Interior Health Authority
- Island Health Authority
- Northern Health Authority
- PHSA (including CareConnect)
- Providence Health Care
- Private practice (both physicians and MOAs)
- Software vendors
- Vancouver Coastal Health Authority (including Clinical and Systems Transformation)

If you would like to be included in upcoming stakeholder engagements, please email PRIME@gov.bc.ca.

54. What about access to PharmaNet for other purposes (e.g. research, evaluation, external monitoring)?

Under the Information Management Regulation, access to PharmaNet is provided for direct patient care only. Other purposes, such as research, evaluation, and monitoring by any parties other than the Ministry are not in scope for PRIME.

Requests for PharmaNet data for these purposes are handled separately from clinical user access for patient care, using established processes such as the Data Stewardship Committee and Information Sharing Agreements.