

DISTRICT OF COLUMBIA
HEALTH INFORMATION
EXCHANGE
POLICY BOARD
MEETING



August 1, 2019 | 3:00 – 5:00 PM



AGENDA

- **Call to Order**
 - **MOTA Appointment of New Members**
 - **Roll Call**
 - **Announcement of Quorum**
 - **New Member Introductions**
 - **HIE Policy Board Announcements**
- **Q&A on DHCF HIT/HIE Ongoing Projects**
 - **Overview of the DC HIE Rule**
- **HIE Policy Board Subcommittee Workplan Reports and Recommendations**
- **Public Comments**
- **Announcements / Next Steps / Adjournment**

Meeting Objectives

1. Address questions related to the Status Reports on DHCF Health IT and HIE Projects
2. Discuss and **act on** on subcommittee(s) recommendations
3. Hear general public comment(s) on health information exchange

Welcome to the Board!



Jessica Herstek, MD

Medical Director of Inpatient Informatics, Children's National Health System

Board Seat: Public member representing a medical provider that provides primary care or specialty services



Alice Leiter, JD

Board Member, DC Greens

Board Seat: Public Member with health care or information technology experience



Barry Lewis, MD, MBA

Chief Medical Officer, AmeriGroup

Board Seat: Public member representing the DC Medical Society



Q&A on DHCF HIT/HIE Ongoing Projects



Michael Fraser, MPH
Management Analyst



Cynthia Graves, MSH
Program Analyst



Nina Jolani, MS
Program Analyst



**Eduarda Koch, MS,
MBA**
Project Manager



**Adaeze Okonkwo,
MPH**
Program Analyst

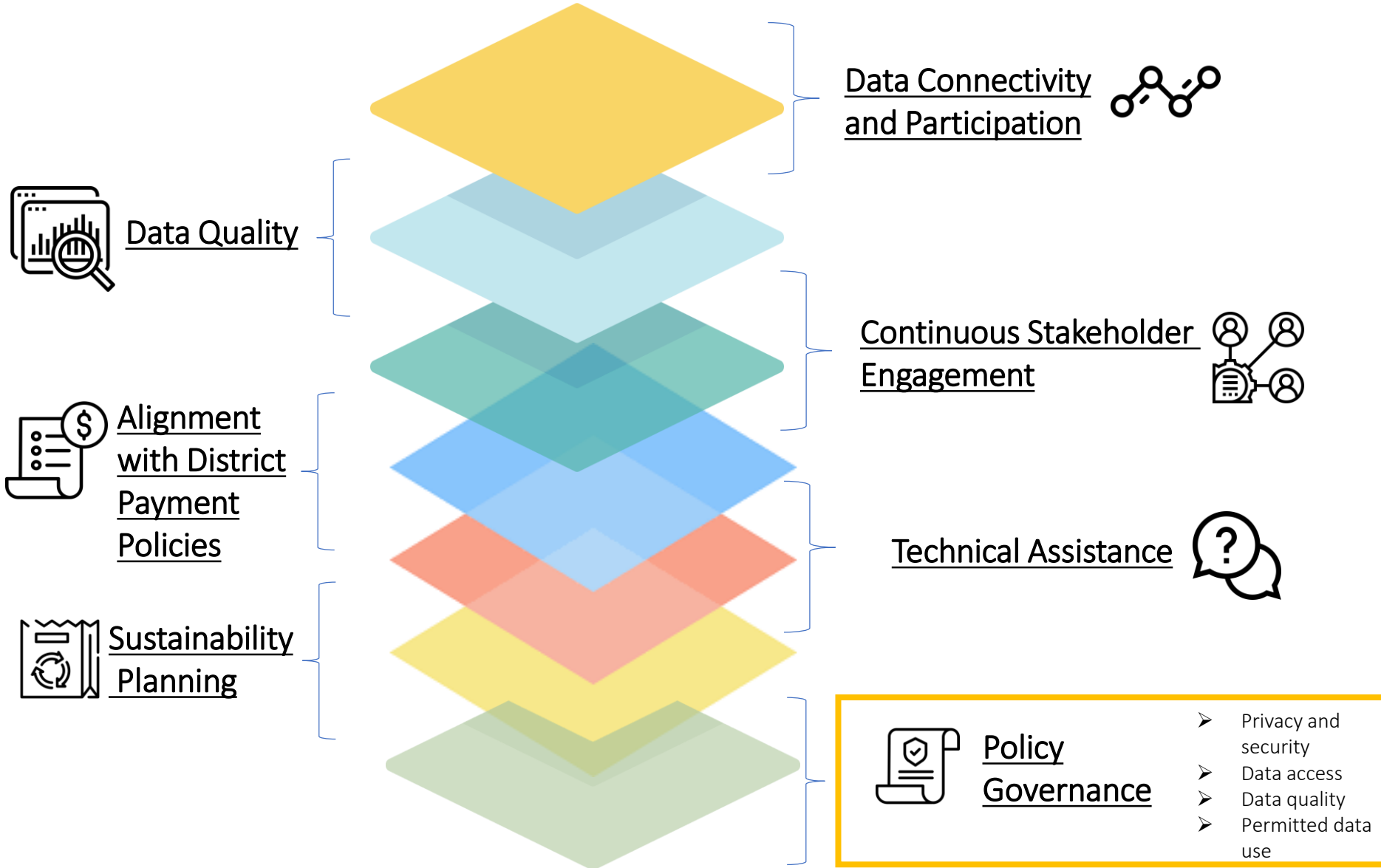


**Noah Smith,
MPH, EMT**
Program Manager



**Deniz Soyer,
MBA, MPH**
Project Manager

The SMHP Lists Foundational Layers for the DC HIE



The Rule was Developed with Key Stakeholders

1. Researched state HIE regulations and policies from six states
2. Convened a subcommittee of the DC HIE Policy Board composed of:
 - a) District HIE users,
 - b) National technical HIE experts, and
 - c) Representatives from all three HIE organizations operating in DC
3. Held twelve meetings between March 2017 and February 2018 to:
 - a) Provided feedback on technical, privacy, security, consumer rights and education requirements
 - b) Developed DC HIE definitions
 - c) Defined a formal registration and designation process
 - d) Reviewed a draft application for registration
4. Posted draft rule for public comment in December 2018 and received comments from one organization (Kaiser Permanente Mid-Atlantic)

The Rule Establishes the DC HIE and Sets Standards for Registered and Designated HIE Entities

- I. The District of Columbia Health Information Exchange
- II. HIE Registration Application
- III. Registered HIE Entity Privacy, Security, Access, Use, Disclosure, and Auditing Requirements
- IV. Immediate Actions to be Taken in the Event of a Breach or HIPAA Violation
- V. Consumer Participation, Access and Education Requirements
- VI. HIE Designation Application
- VII. Designated HIE Entity Auditing and Consumer Education Requirements
- VIII. Oversight and Enforcement
- IX. Appeals and Administrative Review
- X. Definitions

District Registered HIE Entities

District Designated HIE Entity

Why do HIE Entity's Need Privacy, Security, and Access Standards?

- HIE Entities operate today and share health-related information on the majority of DC residents.
- At present there are no District standards to guide the secure exchange, access, use, and disclosure of that information via HIE.

LACK OF
DEFINED
PRIVACY &
SECURITY
STANDARDS



ERODES
PUBLIC
SAFETY &
TRUST

UNCOORDINATED
MARKET OF HIEs



CONTRIBUTES TO
DISCONNECTED
HEALTH SYSTEM

Privacy and Security Requirements in the DC HIE Rule

PRIVACY	SECURITY
<ul style="list-style-type: none">▪ Registered and Designated HIEs subject to privacy laws:<ul style="list-style-type: none">▪ HIPAA▪ Health Breach Notification Rule▪ DC's Consumer Protection Procedures Act▪ 42 CFR Part 2▪ DC's Mental Health Information Act of 1978▪ All other applicable DC and Federal laws regulating the use, access, maintenance, and disclosure of health information▪ Primary Use disclosure requirements (e.g. treatment, payment of claims and billing, health care operations, and reporting to public health authorities)▪ Use of National Institute of Standards and Technology (NIST) standards to mitigate risk of unauthorized use, access, or disclosure of PHI▪ Appointing a system administrator to assure appropriate access and disclosure for and by authorized user▪ Auditing requirements for authorized user authentication, access, to health information	<ul style="list-style-type: none">▪ <u>Registered HIEs</u>: Conduct annual assessments and implementing security measures to reduce risks and vulnerabilities<ul style="list-style-type: none">▪ Protect against anticipated threats to the security or integrity of PHI▪ Protect against unauthorized uses or disclosures of PHI▪ <u>Designated HIEs</u>: Conduct annual privacy and security audit using a third-party auditor<ul style="list-style-type: none">▪ Assess security measures, related to the technical, physical, and administrative safeguards of PHI▪ In the event of a breach all HIEs must immediately notify affected patients, providers, and DHCF and take action to mitigate the impact of the breach.

DHCF's Ongoing Oversight of the DC HIE

The Rule formalizes DHCF's role overseeing the establishment and oversight of the DC HIE

- Develop DC HIE Registration and Designation *applications*;
- Provide educational materials to outline the DC HIE application *process*; and
- *Register* applicants that meet requirements;
- *Select* a Designated HIE Entity among the applicants; and
- Provide *ongoing oversight and monitoring* to ensure compliance with requirements
- Publish *policy guidance* on sections of the rule that require more detail
 - **Great opportunity for HIE Policy Board contribution**

Role of the HIE Policy Board in the DC HIE

Policy Subcommittee

- Helps publish policy guidance per the DC HIE Rule
 - For example: defines secondary use of data, NPP standardization, timeframes for implementing remedial actions
- Prepares the DC HIE to participate in federal and national initiatives around data exchange

Stakeholder Engagement Subcommittee

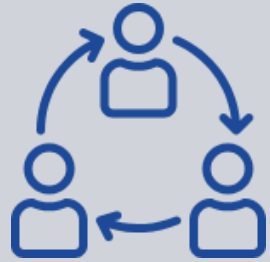
- Captures needs, gaps, and uses from stakeholders
- Helps to define uses cases that support to sustain the DC HIE

OCE Subcommittee

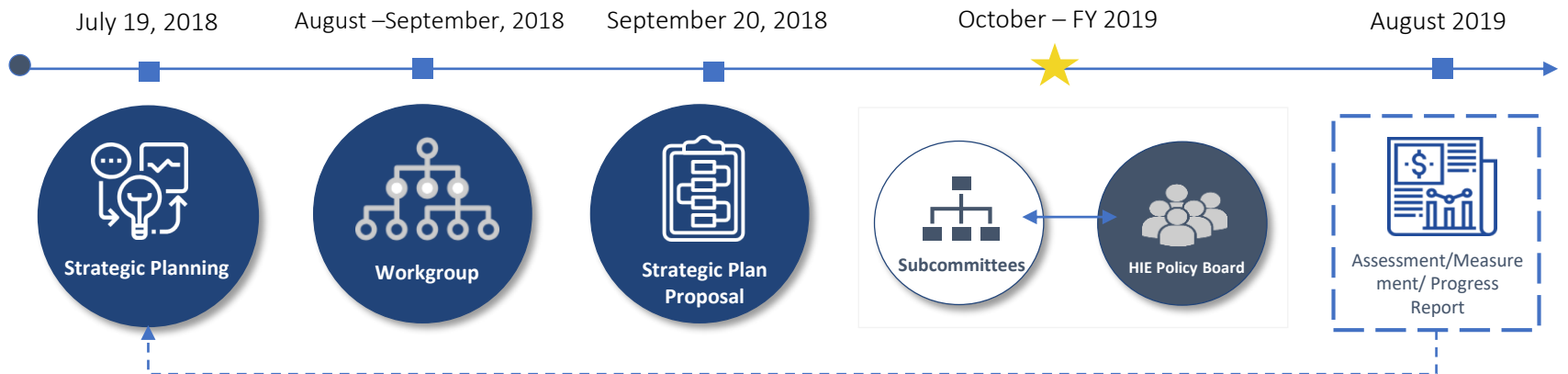
- Recommends community standards for the operation, compliance, and efficiency of the DC HIE
- Includes representation for the District Registered and Designated HIE entities

DC HIE Implementation: Key Dates and Events

DATES	EVENTS
Friday, July 19 th	Final DC HIE Rule is published in the DC Register
	DC HIE implementation materials are published on the DHCF website; registration Application period opens for the registration application (rolling)
Thursday, August 1 st	DHCF communicates to partners and key stakeholders (e.g. HIE Policy Board) the publication of the final DC HIE Rule
Thursday, August 7 th	DHCF holds webinar to provide overview of the DC HIE registration and designation applications process
Monday, August 19 th	Application period opens for the designation application
Wednesday, September 18 th	Application period closes for the designation application
Mid-November 2019	DHCF announces the District Registered and Designated HIE entities



HIE Policy Board Subcommittees Workplan Presentations



Policy Subcommittee – Purpose, Mission, and Membership

Chair Mr. Justin Palmer **Vice Chair** Mr. Praveen Chopra

Purpose Provide recommendations on public policy initiatives that encourage participation in and the sustainability of the DC HIE.

Membership

- **HIE PB Members:** Mr. Justin Palmer, Mr. James Turner, Ms. Amelia Whitman
- **Non-Board Members:** Mr. Praveen Chopra (GWU Medical Faculty Associates), Dr. Melissa Clarke (Physician Consultant), Ms. Jill DeGraff (Aperture Law Group), Dr. Greg Downing (Innovation Horizons, LLC), Ms. Evelyn Gallego (EMI Advisors LLC), Ms. Katheryne Lawrence (District Access System), Mr. Luigi LeBlanc (Zane Networks), Ms. Rachel McLaughlin (Whitman Walker Clinic), Dr. Elspeth Ritchie (Medstar Washington Hospital Center), Dr. Jamie Skipper (Elevation Health Consulting)

Recommendations for Notice of Privacy Practices







- **Subcommittee:** Policy
- **Problem Statement:** The problem that this report addresses is the difference in the language used in NPPs by participating organizations. There needs to be consistent language to strengthen the current NPP of all practices.
- **Summary:** Section 8707.2 of the HIE Rule states that “a participating organization shall provide written notice to each health care consumer no later than the first medical encounter following enrollment of the organization in a registered HIE entity, of: a) Such organization’s participation with a registered HIE entity, including in such organization’s Notice of Privacy Practices under HIPAA.” The Policy Subcommittee conducted an analysis and review of the NPPs utilized by participating organizations and made some recommendations to provide guidance to current NPP language.

Recommendations for Notice of Privacy Practices



The DC HIE Policy Board endorses this report and **recommends that DHCF make this information available on its website**, within a one-year timeframe, to meet the requirements of the DC HIE Rule. The DC HIE Entities should provide this guidance to their participating organizations for improvements and modifications to NPPs.

Policy Subcommittee: Goals & Activities for 2019

Goal #1: Make recommendations to the District government on pending policy issues for the (ongoing) implementation of the DC HIE Rule.		
Activities	Timeframe	Progress
1. Research and define secondary use policy	TBD	
2. Research and define guidance for notice of privacy practices for participating organizations	TBD	
Goal #2: Make recommendations to the District government on strategies to improve understanding of direct to consumer consent management in the District to increase patient trust in the DC HIE.		
Activities	Timeframe	Progress
1. Review consumer education plans of DC HIE entities (registered and designated HIEs) and make recommendations based on nationally known best practices	TBD	
4. Develop report to inform HIE direct to consumer consent management in the District	TBD	
Goal #3: Make recommendations to the District government on strategies to inform the impact of local and national HIT/HIE policies on the exchange of health information in the District.		
Activities	Timeframe	Progress
1. Provide ongoing recommendations and guidance on local policies impacting health information exchange (e.g. DC Mental Health Act)	TBD	
2. Provide ongoing recommendations and guidance on national policies impacting health information exchange (e.g. ONC's Trusted Exchange Framework and Common Agreement)	TBD	

 In Progress  In Development  Not started

Stakeholder Engagement Subcommittee – Purpose, Mission, and Membership

Chair Dr. Yavar Moghimi **Vice Chair** Ms. Layo George

Purpose Gain and maintain stakeholder engagement for long-term operational and financial sustainability of health information exchange in the District

Mission To provide recommendations to the HIE Policy Board on:

- Strategies to promote the value of HIE through discussions and forums with identified stakeholders, and
- The SMHP measurement framework and priorities.

Membership

- **HIE PB Members:** Dr. Zach Hettinger, Dr. Marathe Kalyani, Dr. Eric Marshall, Dr. Yavar Moghimi
- **Non-Board Members:** Mr. Ronald Emeni (CRISP), Ms. Layo George (Medstar), Mr. Mark LeVota (DCBHA), Ms. Veronica Sharpe (DCHCA)

Recommendation to Plan the 2020 DC HIE Stakeholder Summit

- **Subcommittee:** Stakeholder Engagement
- **Problem Statement:** One long-term activity for the Stakeholder Engagement Subcommittee was to plan the DC HIE Stakeholder Summit. The current Subcommittee's work plan excludes the planning of a Summit.
- **Summary:** The Summit would provide an opportunity to showcase the progress on the State Medicaid Health IT Plan (SMHP) implementation, hear of HIE related progress/challenges from key stakeholders, and collect ideas to support the maintenance and sustainability of the DC HIE.

Recommendation to Plan the 2020 DC HIE Stakeholder Summit



The DC HIE Policy Board endorses this report and recommends that the DC Department of Health Care Finance, along with the Board, plan and organize the annual **DC HIE Stakeholder Summit**. For a 2020 Summit, the Board recommends an implementation timeframe of Summer 2019-Spring 2020.

Recommendations for a Set of Long-Term Health IT Evaluation Measures

- **Subcommittee:** Stakeholder Engagement
- **Problem Statement:** The District’s State Medicaid Health IT Plan (SMHP) outlined a Health IT and HIE Evaluation Framework to set the foundation for tracking the District’s progress in improving provider health IT connectivity across four domains: access, exchange, use, and improve. DHCF has already begun implementing near-term measures that will be reported at the end of FY19, that evaluate access, exchange, and use of health IT in the District. The HIE Policy Board tasked its Stakeholder Engagement Subcommittee to collaborate with DHCF to develop long-term HIE evaluation measures that focus on quantifying and evaluating health IT use and its role in improving care.
- **Summary:** The Stakeholder Engagement Subcommittee recommends to the Board a set of long-term evaluation measures for DHCF to implement in FY20 and FY21 (October 1, 2019 – September 30, 2021).

Recommendations for a Set of Long-Term Health IT Evaluation Measures



The DC HIE Policy Board endorses this report and recommends that DHCF implement the following set of **HIE evaluation measures in FY20**:

- The number (and percentage) of District providers who have adopted Certified EHR Technology (CEHRT).
- The number (and percentage) of District Medicaid providers who have adopted CEHRT.
- The number (and percentage) of authorized CRISP users who have Single Sign On (SSO) capabilities and performed a Patient Care Snapshot Query in the last 30 days.
- The number (and percentage) of authorized CRISP users who do not have SSO capabilities and performed a Patient Care Snapshot Query in the last 30 days.
- The number (and percentage) of CRISP users who are satisfied with data quality.
- The number of low-acuity, non-emergent ED visits for Medicaid beneficiaries enrolled in the My Health GPS program.
- The number of hospital admissions among Medicaid beneficiaries, by age group, enrolled in the My Health GPS program.








Recommendations for a Set of Long-Term Health IT Evaluation Measures



The DC HIE Policy Board recommends that DHCF continue to engage the Stakeholder Engagement Subcommittee in FY20 to **refine and finalize the following draft HIE measures** for implementation in FY21:

- The number (and percentage) of District providers, by type, who have a Direct account.
- The number (and percentage) of District providers who electronically collect SDOH data.
- The number (and percentage) of CaLiPR users, by type, that submitted eCQMs as a QRDA file.
- The number (and percentage) of My Health GPS providers that achieved quality requirements and received pay-for-performance (P4P) bonus payments from DHCF.
- The number of repeated imaging and laboratory studies conducted within 90 days.
- The number of potentially preventable hospital admissions among Medicaid beneficiaries enrolled in the My Health GPS program.

Stakeholder Engagement Subcommittee – Goals & Activities for 2019

Goal #1: Research District stakeholders and identify their needs to gain understanding on ways to improve their engagement in the District’s HIE initiatives		
Activities	Timeframe	Progress
1. Conduct stakeholder exercise to map and identify landscape for engagement in HIE capabilities	Winter – Spring 2019	
2. Conduct outreach to identify the barriers and opportunities to participate in the DC HIE	Winter – Spring 2019	
3. Research training and educational materials that will be most useful to providers and other stakeholders	Winter – Spring 2019	
Goal #2: Collaborate with DHCF to promote the value of health information exchange to District stakeholders		
Activities	Timeframe	Progress
1. Promote the value of participating in the HIE with the identified stakeholder groups	Spring – Fall 2019	
2. Facilitate discussions and forums to capture stakeholder views on HIE in the District	Spring – Fall 2019	
3. Recommend training and educational materials that will be most useful to providers and other stakeholders	Spring – Fall 2019	
Goal #3: Recommend feedback to DHCF on SMHP evaluation measures		
Activities	Timeframe	Progress
1. Collaborate with DHCF and eHealth DC to provide feedback on SMHP measurement framework, define target measures of success	Spring 2019	

HIE OCE Subcommittee – Purpose, Mission, and Membership

Chair Ms. Lucinda Wade **Vice-Chair**: Ms. Gayle Hurt

Purpose Advise, monitor, and improve the community standards for HIE operations in the District.

Mission Facilitate the establishment of standards for the DC HIE entities that reflect best practices and ensure consistent operations within the DC HIE.

Membership

- **HIE PB Members**: Ms. Donna Ramos-Johnson, Ms. Lucinda Wade
- **Non-Board Members**: Mr. Ryan Bramble (CRISP DC), Mr. Jim Costello (DCPCA/CPC), Ms. Gayle Hurt (DC Hospital Association), Mr. Mike Noshay (Verinovum), Mr. LaRah Payne (DHCF)

Draft Report on Timeliness of Hospital System Discharge Summary Data

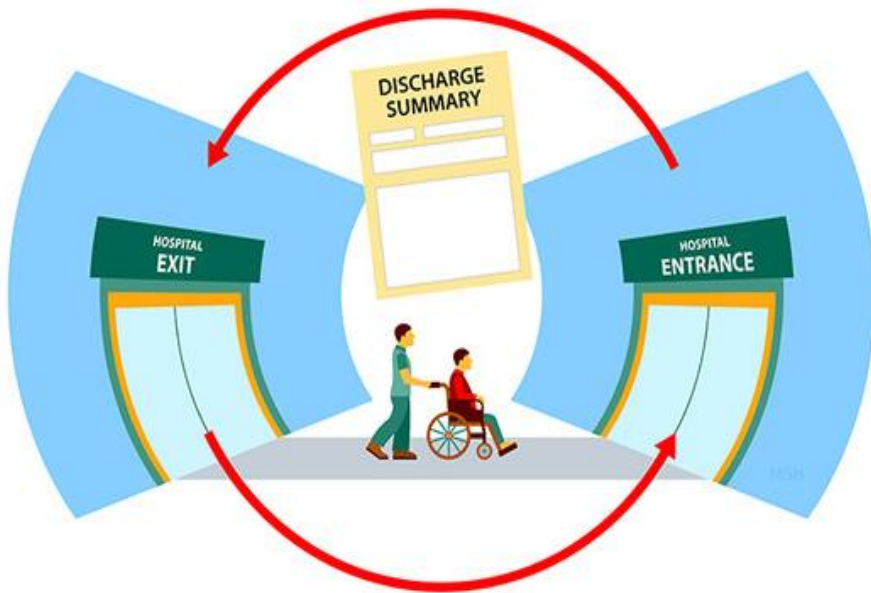


Image Source: [Yale News](#)

The DC HIEs operate in a way that allows health care professionals to access health information electronically; however, the transmission of data from the source EHR to the HIE is often not accurate, complete, and timely. Consequently, these discrepancies can cause significant delays and inefficiencies in the process of health information exchange.

There is **an immediate need to standardize the timeliness of data exchanged to ensure that users can access the right information at the right time.** Given this issue, the subcommittee has narrowed its focus on timeliness of hospital discharge summaries.



Cont'd: Draft Report on Timeliness of Hospital System Discharge Summary Data

From April to July 2019 the HIE OCE Subcommittee engaged in an initial assessment, which examined **7 local hospital systems'** ability to transmit discharge summary data to the CRISP HIE.

The Subcommittee determined that timeliness of discharge summaries generally ranges between **2.5 to 30 days with a average of 5 days*** in a preliminary query; however, hospital policies based on external requirements (i.e. Joint Commission and Centers for Medicare and Medicaid Services) typically allow for 30 days. CRISP DC took about 20 samples from several hospitals and made some preliminary determinations [Figure 1].

*Please note, these numbers have been retracted since the August meeting.

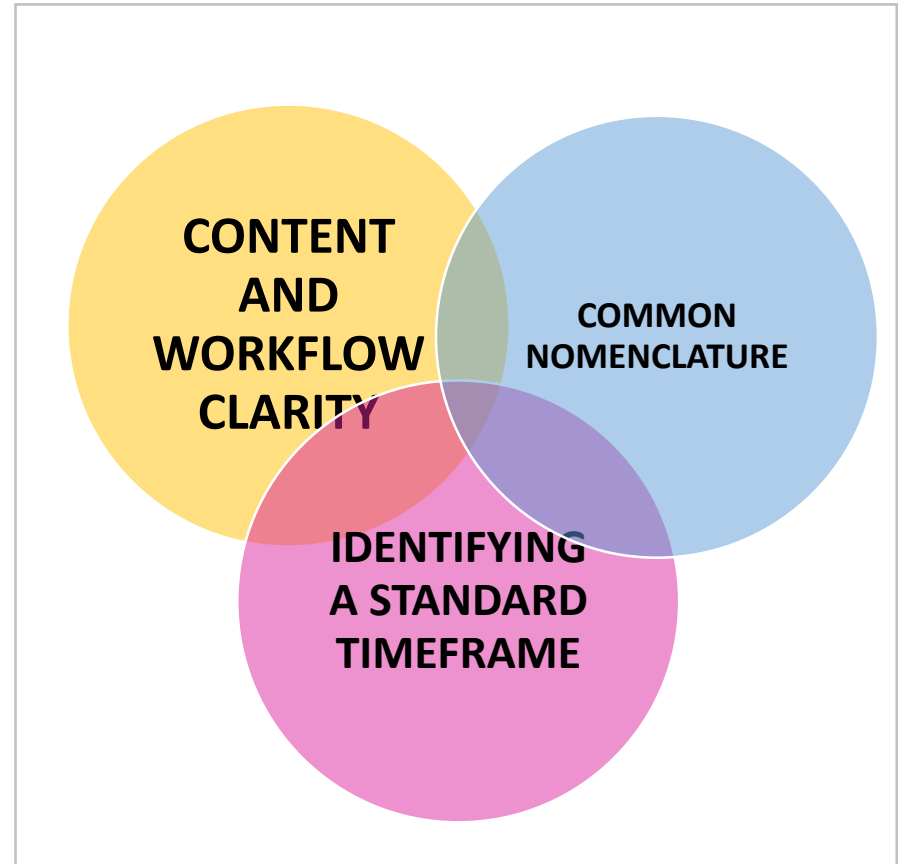
















Figure 1. Three areas of preliminary focus based on analysis.

HIE OCE Subcommittee: Goals and Activities 2019

Goal #1: Recommend benchmarks for accuracy, timeliness and completeness of data.		
Activities	Timeframe	Progress
1. Understand baseline on key dimensions of data quality	Winter-Summer 2019	
2. Analyze national best practices on EHR data quality	Winter-Summer 2019	
3. Draft recommendations to the HIE Policy Board	Winter-Summer 2019	
Goal #2: Recommend baseline operational performance standards.		
Activities	Timeframe	Progress
1. Analyze baseline operational performance based on pool of DC HIE entity applicant submissions	Spring-Summer 2019	
2. Identify gaps	Spring-Summer 2019	
3. Draft recommendations on operational performance standards to HIE Policy Board	Spring-Summer 2019	
Goal #3: Recommend the types of data that should be a core minimum dataset exchanged among the HIEs in the District.		
Activities	Timeframe	Progress
1. Identify a minimum or core dataset based on provider type and use case	Summer – Fall 2019	
2. Understand challenges to creation of exchange of the core minimum dataset	Summer – Fall 2019	
3. Draft recommendations to the HIE Policy Board	Summer – Fall 2019	
Goal #4: Recommend operational terminology and definitions to standardize language used in the District as it relates to health information exchange, consistent with the DC HIE rule.		
Activities	Timeframe	Progress
1. Identify and catalogue key terminology that needs to be defined/clarified in the DC HIE rule to facilitate implementation	Summer – Fall 2019	
2. Crosswalk to nationally or locally defined terminology related to HIE	Summer – Fall 2019	
3. Collaborate with registered and designed HIEs to establish a common nomenclature. This should also align to the HIEs educational materials.	Summer – Fall 2019	
4. Collaborate with the Stakeholder Engagement and Policy Subcommittees to define concepts on an ad-hoc basis	Summer – Fall 2019	
5. Draft recommendation to the HIE Policy Board	Summer – Fall 2019	

 In Progress  In Development  Not started



Public Comments



Announcements/ Next Steps/ Adjournment

Future Meeting Date:

- October 24, 2019, 3-5 PM