TODAY’S AGENDA

- Introduction
- What is the DC HIE?
- What does the DC HIE Rule Accomplish?
- DC HIE Registration Application
- DC HIE Designation Application
- Questions & Answers
What is the DC HIE?
What is the DC HIE?

The District’s statewide health information exchange, an interoperable system of registered and designated HIE entities that facilitates person-centered care through the secure, electronic exchange of health information among participating organizations supported by a District-wide health data infrastructure.
Why does the DC HIE matter for the District?

For **patients**, the DC HIE means having more informed providers who meet their needs and preferences in the delivery of high-quality, high-value health care. Their providers will communicate more regularly, and they won’t need to “tell their story” or bring copies of medical records to offices.

For **HIE entities**, the DC HIE means a level playing field and a citywide governance structure to help exchange health information and meet customer’s needs.

For **providers**, the DC HIE means having timely access to vital patient health information available when and where it is needed. This health information will help providers make better-informed decisions that improve care and safety for their patients.
Foundational Infrastructure for the DC HIE: DHCF Support for Key Policy Capabilities and Resources

- Sustainability Planning
- Technical Assistance
- Alignment with District Payment Policies
- Continuous Stakeholder Engagement
  - Privacy and security
  - Data access
  - Data quality
  - Permitted data use
- Policy Governance
- High Quality Data
The DC HIE’s Five Core HIE Capabilities for Providers

Clinical Patient Lookup

Electronic Clinical Quality Measures (eCQM) Calculation and Review

Specialized Registry Submission through EHRs

Advanced Analytics for Population Health Management

Simple and Secure Digital Communications Among Providers
What does the DC HIE Rule Accomplish?
What does the DC HIE Rule Accomplish?

- **Establishes the DC HIE** and sets the standards and expectations for health information exchange that DHCF regulates.

- **Bolsters** public trust by defining characteristics and requirements to facilitate secure, timely exchange of health information.

- **Ensures** core services are maintained through designated HIE entities.

- **Designs** advanced payment models that utilize the exchange of health information.

- **Formalizes** partnerships to facilitate a more direct level of cooperation between DHCF and HIEs operating in the District (i.e. clearly define who participates in The DC HIE).
## Privacy and Security Requirements in the DC HIE Rule

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<th>PRIVACY</th>
<th>SECURITY</th>
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<td>▪ Registered and Designated HIEs subject to privacy laws:</td>
<td>▪ Registered HIEs: Conduct annual assessments and implementing security measures to reduce risks and vulnerabilities</td>
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<td>▪ HIPAA</td>
<td>▪ Protect against anticipated threats to the security or integrity of PHI</td>
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<td>▪ Health Breach Notification Rule</td>
<td>▪ Protect against unauthorized uses or disclosures of PHI</td>
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<td>▪ DC's Consumer Protection Procedures Act</td>
<td>▪ Designated HIEs: Conduct annual privacy and security audit using a third-party auditor</td>
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<td>▪ 42 CFR Part 2</td>
<td>▪ Assess security measures, related to the technical, physical, and administrative safeguards of PHI</td>
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<td>▪ DC's Mental Health Information Act of 1978</td>
<td>▪ 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.</td>
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<tr>
<td>▪ All other applicable DC and Federal laws regulating the use, access, maintenance, and disclosure of health information</td>
<td>▪ Appointing a system administrator to assure appropriate access and disclosure for and by authorized user</td>
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<tr>
<td>▪ Primary Use disclosure requirements (e.g. treatment, payment of claims and billing, health care operations, and reporting to public health authorities)</td>
<td>▪ Auditing requirements for authorized user authentication and access to PHI</td>
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<tr>
<td>▪ Use of National Institute of Standards and Technology (NIST) standards to mitigate risk of unauthorized use, access, or disclosure of PHI</td>
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Roles and Responsibilities of Registered or Designated HIE Entities

- Ongoing requirements as
  - Registered and
  - Designated HIE Entities
- Notification of incidents to DHCF and impacted consumers
- Reapplication
  - Registration – 3 years
  - Designation – 5 years
- Enforcement actions by DHCF to ensure standards are met
Why Register as an HIE Entity?

- What’s the eligibility requirements?
  - ✓ Meet the definition of a HIE entity as described in the HIE Rule and provided below.
  - ✓ The HIE entity or its managing business organization, is a business organization established under District or applicable state laws.

- Approval as a District Registered HIE Entity demonstrates that the HIE entity meets or exceeds privacy, security, and access requirements for health information exchange identified by DHCF and District stakeholders.

- The District Registered HIE Entities will receive key opportunities to engage in discussions with other District Registered and Designated HIE Entities that make up the DC HIE.

- Participation in the DC HIE is voluntary, however, HIE entities that do not apply are able to continue their operations in the District.
DC HIE Registration Application
What are the application components to apply to be a District Registered HIE Entity?

The application is divided into two separate documents posted on the DC HIE – Registration Application webpage. The documents include:

1. A fillable (PDF) DC HIE Registration Form
2. A Guidance on Applying to be a District Registered HIE Entity, which includes the following:
   - Instructions for the attachments of the required documents
   - FAQs on key administrative requirements for ongoing maintenance as a District Registered HIE Entity
Guidance on Applying to be a District Registered HIE Entity

This document provides instructions to apply to be a District Registered HIE Entity. Please read prior to beginning the application process.

Application Period: Ongoing

Last Updated: July 19, 2019

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How to Apply for Registration?

Step 1: Read Guidance on Applying to be a District Registered HIE Entity

Step 2: Complete, sign, and save the fillable PDF DC HIE Registration Form

Step 3: Attach and label the following separate required documents to one e-mail (all in PDF format):
- Completed and signed DC HIE Registration Form
- A.1: Organizational and operational information
- A.2: General business liability insurance and cyber liability insurance
- A.3: Third-party privacy and security audit report or letter
- A.4: Third-party financial audit report or letter
- A.5: Policy for reasonable notice to cease operations
- A.6: User access control policy
- A.7: Processes and policies in response to breaches
- A.8: Incident response plan
- A.9: Policy for performance of periodic, random audits
- A.10: Consumer education policy
- A.11: Consumer opt-out form
- A.12: Notice of privacy practice
- A.13: Participation agreement

Step 4: Title the subject of the e-mail DC HIE Registration Application

Step 5: Send e-mail to dc.hie@dc.gov

Step 6: Receive confirmation from DHCF
DC HIE
Designation
Application
Why Apply to be the District Designated HIE Entity?

- The District’s Designated HIE Entity is acknowledged as DHCF’s committed partner for citywide HIE services.

What’s the eligibility requirement?
- Concurrently submit a DC HIE Registration Application to DHCF or have previously been approved as a District Registered HIE Entity.
- Meet or exceed the consumer education and auditing requirements set forth in Chapter 87, District of Columbia Health Information Exchange, of Title 29, DCMR, (“HIE Rule”).
- Be organized in accordance with the District of Columbia “Nonprofit Corporation Act of 2010,” effective July 2, 2011 (D.C. Law 18-378; 58 DCR 1720) or organized as a nonprofit corporation in the jurisdiction where the entity is incorporated.

Only one (1) District Registered HIE Entity will be selected for District Designated HIE Entity status in 2019.
What are the application components to apply to be a District Designated HIE Entity?

The application is divided into two separate documents posted on the Designation Application webpage. The documents include:

1) A fillable (PDF) **DC HIE Designation Form**

2) A **Guidance on Applying to be a District Designated HIE Entity**, which includes the following:
   - Instructions for the required development and submission of four (4) organizational plans
   - Instructions on the submission of additionally required documents (e.g. IRS Form 990, and accreditations or certifications attained by the HIE Entity)
   - FAQs on key administrative requirements for ongoing maintenance as a District Designated HIE Entity
Guidance on Applying to be the District Designated HIE Entity

This document provides instructions to apply to be the District Designated HIE Entity. Please read prior to beginning the application process. The DC HIE Registration Application precedes this application.

Application Period: August 19 – September 18, 2019

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How to Apply for Designation?

Step 1: Read Guidance on Applying to be the District Designated HIE Entity

Step 2: Complete, sign, and save the required (fillable PDF) DC HIE Designation Form

Step 3: Develop the four required organizational plans (use Guidance on Applying to be the District Designated HIE Entity):

- B.1: Plan #1 Strategic and Operations
- B.2: Plan #2 Financial Sustainability
- B.3: Plan #3 Access and Auditing
- B.4: Plan #4 Health Care Consumer Education

Step 4: Attach and label the required separate documents to one e-mail (all in PDF format):

- DC HIE Designation Form
- Documents B.1-B.4
- Include the following documents:
  - B5: Internal Revenue Service Form 990
  - B6: Accreditations or Certifications
  - Other supporting documents as deemed necessary by the applicant

Step 5: Title the subject of the e-mail **DC HIE Designation Application**

Step 6: Submit the e-mail to dc.hie@dc.gov by Wednesday, September 18, 2019 at 5:30 PM ET. Applications will not be accepted after the deadline.

Step 7: Receive confirmation from DHCF
**KEY DATES**

**Monday, August 19, 2019**
Application period opens for designation application

**Wednesday, September 18, 2019**
Application period closes for designation application

**Mid-November 2019**
DHCF announces the District Registered and Designated HIE entities
Questions?

Thank You.

Contact us at  dc.hie@dc.gov