

Operating Policy and Procedure

Subject: eHealth Exchange Service Levels and Operating Monitoring		
Status: Final – Approved by CC	Policy #: OPP-11	
Effective Date: 6/19/201606/01/2020	Version: 1.01	Page 1 of 5

I. Purpose

The eHealth Exchange currently operates as a ~~federated-hybrid~~ network ~~with no centralized mechanism to capture metrics or to that needs to~~ provide quality assurance about Participant system availability, performance, content quality, conformance, etc. This type of operational monitoring ~~is based on each use case and~~ is important for the eHealth Exchange network to assist Participants in proactively identifying issues and in developing strategies and solutions to minimize system timeouts and unpredictable response times.

Participants are obligated, in Section 15.08 of the DURSA, to transmit information to other Participants in a timely manner ~~and in accordance with the Performance and Service Specifications and Operating Policies and Procedures~~. The eHealth Exchange Coordinating Committee ~~is has~~ established ~~ing~~ a ~~process-solution~~ to monitor Participant's system performance to improve the reliability and responsiveness of the transmissions across the eHealth Exchange network. To that end, the Coordinating Committee delegates responsibility to Healthway, Inc. (d/b/a The ~~EHealth-eHealth~~ Exchange) and its eHealth Exchange Support Staff ("Staff"), to provide operational support to eHealth Exchange Participants and the Coordinating Committee, including but not limited to the set of responsibilities outlined in OPP #1 and OPP #9 as well as facilitating the operational monitoring necessary to implement OPP #11, described below.

The purpose of this OPP is to capture key operational metrics including, but not limited to, reachability, availability and response time. ~~These metrics will be captured via the eHealth Exchange Hub and will be made available via an operational dashboard called the "Hub Dashboard". The Hub Dashboard will be accessible by both eHealth Exchange support staff and Participant representatives. These metrics will may also be provided to the Coordinating Committee to aid their determination of the need for, and nature of, any future requirements related to eHealth Exchange Service Levels. Note that any point-to-point, non-Hub based connectivity and messaging metrics are not included in the Hub Dashboard metrics.~~

~~The initial scope of this OPP is to monitor responding query based exchange gateways for Treatment purposes only. In the future, initiating gateways may be within scope, under a revised OPP #11. The system will be designed with technical controls to prevent PHI from being exchanged during the monitoring process and thus EHealth Exchange will not become a Business Associate of Participants as a result of such monitoring.~~

II. Policy

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eHealth Exchange Staff will pro-actively monitor the availability and performance of all responding Participants' gateways in the PRODUCTION environment. Related gateway availability and messaging metrics will be made available in an operational dashboard. ~~Monitoring may also be conducted in the VALIDATION environment.~~ In the event of a Participant gateway outage or significant error event, eHealth Exchange support staff will contact respective Participant(s) to report the outage and request investigation and remediation.

An operational dashboard will also be made available to Participants. This dashboard can be used by Participants to view status of all Participant gateways along with metrics related to their data exchange with other Participants. ~~Monitoring will be conducted on a schedule as defined in section IV. The results of assessments will be aggregated across Participants and published to designated contacts at each Participant and to the Coordinating Committee. The report will include aggregated performance data, plus identifiable performance results only for that specific Participant. PRODUCTION monitoring will be maintained separately from VALIDATION monitoring. Any data provided to Participants about other Participants will be de-identified. The operational monitoring system will be designed to have technical enforcement to prevent Protected Health Information from being accessed, and thus EHealth eHealth Exchange will not become a Business Associate due to this assessment. The operational dashboard will not contain PHI nor PII.~~

Real-time ~~M~~ monitoring may also be conducted in the VALIDATION environment. ~~The operational monitoring system source code will be available to inspection by designated staff at Participants to help ensure transparency, and protection of PHI, in the operational monitoring process.~~

III. Procedure

1. Staff will pro-actively monitor the availability of Participant gateways in the PRODUCTION environment via the eHealth Exchange Hub.
2. In the event of a gateway availability issue or any other issue that affects the ability for a gateway to successfully respond to requests via the eHealth Exchange Hub, staff will contact Participant to report the issue.
3. The eHealth Exchange Hub Dashboard will provide on-demand, near real-time status of Participant gateways along with data exchange metrics, including transaction type, timing, volume, size, and status. The Hub Dashboard will be available to both eHealth Exchange support staff and Participant representatives. The Hub Dashboard will not contain PHI nor PII.

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4. Participants will be able to view status of all Participants' gateways via the Hub Dashboard. Participants will also be able to view metrics on their data exchange with other Participants (i.e. Cross-Participant messaging). Participants will not be able to view data exchange metrics for which they are neither the initiator nor responder.

5. Participants will be able to define scheduled maintenance/downtime windows to inform the eHealth Exchange of periods of expected gateway unavailability. These downtime windows will be specified and maintained by the Participants themselves within the eHealth Exchange Participant Directory.

~~1. run as practical and feasible, an operational monitoring system designed to determine certain information about each Participant gateway.~~

~~2. Staff will provide Participants with a scorecard that reports, at a minimum, the following metrics on a periodic basis:~~

~~— Reachability — Determine if communications are possible with the gateway.~~

~~a Availability — Determine if the gateway service is up and running.~~

~~5. Response Time — Determine the speed at which a gateway replies to test transactions.~~

~~6. Phase I collected data will include the date and time of the monitoring assessments, name of the Participants, IP addresses, domain names, port numbers, service end points, response codes, test types, and the response times. For Phase II, collected data will be expanded to include number of test patients matched, number of test documents retrieved and sizes of test documents retrieved.~~

~~6. Staff will analyze the collected data and publish it in aggregated format to inform the Coordinating Committee on a monthly basis.~~

~~7.~~

~~8. Staff will review the performance metrics of each Participant, and provide a report to each Participant with that Participant's metrics on a monthly basis. Staff will also provide an aggregated report of other Participants' metrics to each Participant.~~

9.7. To help eliminate the possibility of PHI from being accessed by Staff, any all-required tests testing will be structured to use parameters designed to return no actual patient data. This will implemented by using demographics that are known to be associated only with test patients and/or demographics that are known to not correlate to any patient, such an invalid patient ID, and via specific technical values in the request, as documented in Section IV immediately below.

IV. Definitions:

DURSA: —Data Use and Reciprocal Support Agreement

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eHealth Exchange Hub: is an eHealth Exchange solution that conforms to Performance and Service Specifications.

Hub Dashboard: is a dashboard built into the eHealth Exchange Hub solution that captures key operational metrics for responding gateways that include reachability, availability and response time.

~~Additional definitions to be added~~

All other capitalized terms, if not defined herein, shall have the same meaning as set forth in the DURSA.

V. References:

“Restatement II of the Data Use and Reciprocal Support Agreement (DURSA)”, Version Date: August 13, 2019

- ~~DURSA~~, Section 14, Privacy and Security
- ~~DURSA~~, Section 15, Representations and Warranties
- ~~DURSA~~, Section 17.01, Disclaimers-Reliance on a System
- ~~DURSA~~, Section 19, Term, Suspension and Termination
- ~~eHealth Exchange Issue Resolution Process~~ Section 21, Dispute Resolution

VI. Related Policies and Procedures:

- OPP #1 ~~–~~ Participation – Review and Disposition of Applications for Participation
- OPP #3 ~~–~~ Participation – Changes, Suspension, Termination
- OPP #9 ~~–~~ eHealth Exchange Digital Credentials

VII. Version History:

ID	Date	Author	Status	Comment
1	5/17/2016	Jennifer Rosas/Eric Heflin	Published	First eHealth Exchange Coordinating Committee approved version.

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<u>2</u>	<u>2/2020</u>	<u>Jay Nakashima</u>	<u>Updated language to reflect newest DURSA amendment changes; Updated formatting for consistency and readability; Updated to reflect current environment and operations of eHealth Exchange</u>
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