

Operating Policy and Procedure

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| Subject: Participants Must Use Hub for All Transactions with eHealth Exchange Participants | | |
| Status: Final | Policy #: OPP #16 | |
| Effective Date: 11/1/2022 | Version:1.1 | Page 1 of 4 |

I. Purpose

The eHealth Exchange Hub was created to provide all Participants with a practical, secure and efficiently scalable mechanism to exchange with all other Participants nationwide while providing the Coordinating Committee improved insights to manage the network. It allowed the eHealth Exchange to move from a federated directory of endpoints to a true network. The purpose of this Operating Policy & Procedures (OPP) is to inform eHealth Exchange Participants of the requirement for all Participants to connect to the Hub for initiating and responding queries unless there is an exception approved by the Coordinating Committee (CC) and ratified by the Participants. This OPP also sets forth the bases and process for requesting an exception.

The policy to require use of the Hub for exchange outlined in this OPP is intended to reduce Participant costs and effort in creating and maintaining unique point-to-point connections to other Participants, to provide Participants with additional capabilities, and provide the Coordinating Committee (CC) and eHealth Exchange staff the ability to monitor exchange activity for compliance and security purposes.

II. Policy

By signing the DURSA, each Participant has acknowledged the desire to share Message Content with other eHealth Exchange Participants. This policy outlines the requirements for Participants to initiate queries and respond to queries utilizing the Hub for all transactions of approved use cases, as well as how to request an exception from such requirements.

Use of point-to-point connections with eHealth Exchange Participants must be discontinued by (12/31/2022) unless a Participant has requested an exception and it has been approved by the Coordinating Committee (CC).

- Each Participant must complete responder testing and initiator testing via the Hub.
- Participants must initiate all queries for Message Content by routing requests via the eHealth Exchange Hub, regardless of the purpose of use (e.g., Treatment, Healthcare Operations).
- Participants must route all responses to queries via the eHealth Exchange Hub, regardless of the purpose of use (e.g., Treatment, Healthcare Operations) and/or document type (e.g., CCDs, histories & physicals, discharge summaries, etc.).

Participants may request an exception to these requirements, as set forth below. Each such request will be reviewed on an individual basis by the Coordinating Committee (CC).

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III. Procedure

A. General Procedure

This OPP requires each eHealth Exchange Participant to complete all exchange transactions between and among other eHealth Exchange Participants via the eHealth Exchange Hub, as outlined below.

- Participant completes and passes initiator and responder testing on the Hub.
- Participant approves promotion to production (“go-live”).
- Participant routes all initiator and responder transactions with each/every eHealth Exchange Participant and all document types available via the eHealth Exchange Hub, regardless of the purpose of use.
- Participant may set up and route to push Message Content via the Hub (e.g., from provider to APHL for Electronic Case Reporting). (This is an optional setup, however, if requested must be routed through the eHealth Exchange Hub)

B. Requests for Exceptions

Participants may request an exception to the requirements of this OPP by providing all detail related to the request to administrator@ehealthexchange.org. Possible exceptions that may be requested include, but are not limited to, connections to eHealth Exchange for only non-treatment purposes, such as SSA for disability determination, or Direct Secure Messaging, etc.)

- The request will be sent to the CC for review and a determination on the request.
- The CC may request additional information from the Participant if the CC feels additional information is needed to make an informed decision on the request.
- Once the CC decides whether to approve or deny the request, the Participant will be notified of that decision.
- If the request is denied, the Participant may utilize the Dispute Resolution Process outlined in the DURSA, Attachment 6.

C. Enforcement

The eHealth Exchange Coordinating Committee monitors the eHealth Exchange Dashboard for utilization as an indicator of compliance with the DURSA and eHealth Exchange OPPs.

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- The CC has the authority to contact any Participant to request information in an effort to ensure compliance with the DURSA and with this and other OPPs.
- In the event of non-compliance by a Participant, the CC may request a corrective action plan from Participant and/or take other action as outlined in Section 19.03 of the DURSA and/or the Dispute Resolution Process set forth in Attachment 6 to the DURSA.

IV. Definitions

CCD: Continuity of Care Document is an electronic document exchange standard for sharing patient summary information.

CCDA: Consolidated Clinical Document Architecture used to create documents and template methodologies for medical documents.

eHealth Exchange Hub: A centralized Network Utility that operationalizes many of the Performance and Service Specifications that have been adopted by the eHealth Exchange. It employs shared infrastructure used to facilitate the transmission of messages for the eHealth Exchange network that may include, but is not limited to, gateway services, healthcare directory, and record locator services.

Electronic Case Reporting: The secure creation and transmission of case reports from an electronic health record to public health agencies for disease tracking, case management, and contact tracing.

V. References

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

- Section 19.03, Suspension by Coordinating Committee
- Attachment 6, Dispute Resolution Process

VI. Related Policies and Procedures

- a. OPP #3: Participation - Changes, Suspension, Termination

VII. Version History

| | Date | Author | Comments |
|---|-------------|---------------------------------|------------------|
| 1 | 02/2022 | Pat Russell, Cait Riccobono, | Original Version |

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|---|---------|-------------|---|
| 2 | 09/2022 | Pat Russell | Clarification added 2 nd paragraph of Policy section |
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