

Operating Policy and Procedure

Subject: Participants Must Use Hub for All Transactions with eHealth Exchange Participants		
Status: Final	Policy #: OPP #16	
Effective Date: 1/6/2024	Version: 4	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). The CC may adopt exceptions for the entire eHealth Exchange as technology and market conditions evolve. The process for this is set forth below in section III. A Participant can request an exception for special circumstances as set forth below in section III.

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, unless an exception applies. Specifically:

- Each Participant must complete responder testing and initiator testing via the Hub when required.
- 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) unless an exception applies.
- 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 relevant data types (e.g., CCDs, histories & physicals, discharge summaries, etc.) unless an exception applies.

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 when required.
- Participant approves promotion to production (“go-live”).
- Participant routes all initiator and responder transactions with each/every eHealth Exchange Participant and all relevant data 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

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C. Network-wide Exceptions

The CC may decide to implement an Exception that is applicable to all eHealth Exchange Participants, or an identifiable subset of all eHealth Exchange Participants such as those that elect to participate in another network via the eHealth Exchange, for specific reasons including, but not limited to, evolving market conditions, new technology solutions or new federal policy decisions. The CC will, to the extent practical, seek input from Participants about any network-wide Exception in order to evaluate the effects of the Exception on Participants and the eHealth Exchange as a whole. If the CC approves any network-wide Exceptions, the CC will communicate the Exception to all Participants and post an explanation of the Exception on the eHealth Exchange website as a policy clarification to this OPP. Exceptions approved by the CC are not amendments to this OPP and are not required to go through the change management process set forth in the DURSA because this would be unwieldy and could inhibit the eHealth Exchange from making adjustments in a timely manner.

D. 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.

- 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

See OPP Glossary of Terms document

All other capitalized terms, if not defined, 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 Dated August 13, 2019:

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

VI. Related Policies and Procedures

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

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VII. Version History

	Date	Author	Comments
1	02/2022	Pat Russell, Cait Riccobono, Jay Nakashima	Original Version
2	09/2022	Pat Russell	Clarification added 2 nd paragraph of Policy section
3	9/2023	Pat Russell	Point to Point language removed; All definitions moved to OPP Glossary of Terms
4	10/2023	Pat Russell, Steve Gravely	Added Network Wide Exceptions and detail to accommodate integration that does not use “documents”.