



The Arizona Common Framework

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Arizona Common Framework—Background

- Arizona Health-e Connection—fostering the development of health information exchanges in Arizona
 - Community-based forum for statewide action
 - Education and communication on HIE issues
 - Development of common HIE standards, practices and policies

Arizona Common Framework—Background

- What is a common framework?
 - Common practices for health information exchanges
 - Compatible rules
 - How is information transferred?
 - Who has access to health information and why?
 - How do consumers participate in exchange?
 - How is information safeguarded?
 - How do systems connect?

Arizona Common Framework--Background

- Building a road for health information: common standards and policies to exchange information—local, statewide, national interoperability
- Establishing trust between participants—everyone working from same rules
 - Making key information available at point of care
 - Focus on health information privacy and security
- Accountability and safeguards
- Avoiding reinvention through common policies and technical standards

Arizona Common Framework—Background

- National effort: Markle Foundation *Connecting for Health Common Framework*
 - <http://www.connectingforhealth.org>
 - <http://www.markle.org>

Arizona Common Framework Projects

- ***Model participation agreement*** for health information exchange
- ***Model policies and procedures*** for health information exchange
- ***Proposed legislation*** to remove barriers to health information exchange and to ensure rigorous accountability and enforcement

Community Input

- AzHEC Legal Work Group
- AzHEC Clinical and Technical Work Group
- Health Information Security and Privacy Collaboration (HISPC) volunteers—
 - Consumers
 - Physicians and other providers
 - Hospitals, home health agencies, nursing homes, clinical laboratories
 - Payors and employers
 - Universities and community colleges

Community Input

- AzHEC Board of Directors—stakeholder representatives
- AzHEC Consumer Advisory Group
- Hospital and medical society involvement



Model Participation Agreement

Model Participation Agreement

Setting the Rules of the Road

- Who:
 - Health care providers, health information sources, health information exchanges
- What:
 - Clinical information
- Why:
 - Treatment
 - Other purposes agreed to by stakeholders

Model Participation Agreement

- Guiding principles
 - Focus on key requirements for a secure and effective exchange of information
 - Voluntary participation in HIE—providers can leave if the exchange is not helpful
 - Build on existing practices between physicians and patients

Model Participation Agreement

- Participants and permitted use
- Privacy and security measures
 - Authentication of providers
 - Organization and individual users
 - Role-based, focus on treatment purpose
- Accountability
 - HIE policies and standards
 - Compliance programs: monitoring & enforcement
 - Termination if participants don't follow requirements

Model Participation Agreement

- Template agreement for health information exchanges
- Emphasis on readability and implementation
- Incorporates best practices from other exchanges across country



Model Policies and Procedures

Model Policies and Procedures: In Development

- Security issues:
 - Authentication: How do we know an individual is who he says he is?
 - Role-based access: Once an individual is authenticated, what information can she see based on her role?
 - Audit: What information has an individual accessed, and was access appropriate?

Model Policies and Procedures

- Accountability and Enforcement
 - Termination of individual access
 - Requirement that participating entity take disciplinary action for inappropriate access
 - Termination of HIE agreement with participating entity
 - Reporting compliance to HIE
 - Mitigating impact of noncompliance on consumers

Model Policies and Procedures

- Reasons for access
 - Treatment
 - Other purposes agreed to by stakeholders
- Consumer involvement
 - Notice of HIE practices
 - Access to information in exchange
 - Consent to exchange health information

Model Policies and Procedures

- Consent to exchange information: see White Paper in materials
 - What do different stakeholders think about the consent issue?
 - What is current law and practice?
 - What other issues will affect the decision on how to implement consumer direction?
 - Options: “opt-in”; “opt-out”; “notice only”; combination



Proposed Legislation

Removing Barriers to HIE and Protecting Privacy

- Legal Work Group developed proposals over 2007—seeking feedback of stakeholders and introduction in January 2009
- See Executive Summary of proposed legislation on AzHEC Web site
 - Addresses communicable disease, mental health, genetic testing and immunization information
 - Addresses protection of medical records requested by subpoenas

Removing Barriers to HIE and Protecting Privacy

■ Summary:

- Remove requirements for “written” records or records “recorded in ink”-- inconsistent with electronic exchange
- Remove redisclosure prohibitions and permit redisclosure of records to permitted individuals
- Permit HIE to handle medical records on behalf of health care providers (and make HIEs subject to more protective medical records subpoena statute)

Accountability and Enforceability

- Convening Legal Work Group to draft new statute or amendments to existing statutes to ensure rigorous accountability for those who access health information through an HIE
 - Meeting: June 12, 2008: contact Kim Snyder at ksnyder@azgita.gov to get involved

Questions???

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