Artifact Description

This artifact documents the policy requirements that a CHeQ California Trust Framework (CTF) Pilot Participant will be required to satisfy as a component of the onboarding process to Phase 2 of the Pilot. It was iteratively produced by a collaborative process involving the approved Federated Provider Directory Track Phase 1 Pilot HIO participants who are bound by the contract that funded their participation. Further context and background regarding how this artifact fits into the Pilot can be found here: http://cheq.wikispaces.com/Trust+Framework

The following organizations are the awardees that participated in developing this artifact:

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Obligations of the Parties

Many of the policy requirements identified here are satisfied by the terms and conditions of an HIO or Service Provider's Participant Agreement with its clients. There are many ways that such terms and conditions can be written into contracts. To facilitate the process, the Phase 1 Pilot Participants have attempted to describe the policy domain to be covered by relating the obligation to the relationships encompassed by the flow-downs implied in the policy requirements.

For the purposes of the Trust Framework we have defined four Parties (**HIO**, the HIO's **Participant(s),** the Participant's **Authorized End User(s)** and **CHeQ**) within the scope of the policy domain under consideration. Among these Parties, we capture the policy requirements of the CTF, as an obligation between two parties (for example, between the HIO and the Participant) and what obligations exist between Parties where some of the obligations are placed on one Party by another wherein that Party requires its subordinates to satisfy an obligation as a flow down (for example, where the HIO obligates the Participant to require the Participant's Authorized End Users to fulfill specific requirements).

Overview

The following hyperlinks provide an overview of the remainder of this document:

A) Obligations of the SDS and LDS
B) Obligations of the HIO
   1) Business Process Policies
   2) Data Elements
   3) Auditing
   4) Service Registry Facing

Definitions of specific terms used in this artifact can be found at the end of this document.

CHeQ: California Trust Framework Pilot – Federated Provider Directory Policy

A. Obligations of the State Directory Service and Local Directory Service:

1. The Service shall not store or distribute protected health information (PHI).
2. The Service shall provide appropriate error responses to the relying party when the relying party does not behave as the service expects[1].
3. Each Pilot Participant acknowledges that Pilot Participants reserve the right to constrain query results based on local policy.
4. The Service shall maintain sufficient information in a log that can be used to recreate the request from a relying service:
   a. The log shall record the conditions necessary[2] to reproduce the output generated at the time the relying party submitted the request.
5. The Service shall make the frequency with which the contents of its offering are refreshed, if it provides data that change[3] over time, discoverable to relying parties.
   a. The Service shall include a 'last updated' date if the service's system supports such a record.
   b. The service shall update the contents of its offering within 72 hours of becoming aware of a change.
6. The service shall adopt a policy of mutual TLS authentication[4].

B. Obligations of the HIO:

1. Business Process Policies:
   a. HIO shall maintain accuracy and currency of Provider Directory contents, including source of content[5].
   b. HIO shall not make available, through the CHeQ CTF Pilot Provider Directory, information that it does not have the authority to make available to other HIOs[6].
   c. HIO acknowledges that it is not required to respond to a query that may violate local policy[7].
   d. HIO acknowledges that access to the CHeQ CTF Pilot Provider Directory is restricted to providers, provider organizations and/or authorized provider agents.

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[1] The intention of this Obligation is to require the service to notify the Relying Party of any errors associated with the query request. This Obligation can be satisfied by adhering to the DSML 2 specification. In addition to an error response an audit of the error message shall be maintained by the service.

[2] The Service shall log the query and response but the conditions necessary will not be prescribed during the CHeQ CTF Pilot.

[3] After the CHeQ CTF Pilot there may be a need to require a Service Level Agreement (SLA) that indicates a dropped provider needs to be removed from the LDS within X-hours. Per Direct policy A.1.o and Exchange policy A.1.r data received from or about such a provider must NOT be used or distributed. Appropriate Policies and Procedures should be in place to ensure that erroneous data is not accessible to other users.

[4] This is a requirement of the LDS and SDS only.

[5] It is sufficient, to satisfy this Obligation, to answer the question "What is the manner in which the records in your LDS are populated." This information will be made available to other onboarded CHeQ CTF Pilot Participants.

[6] HIO must have authorization from its Participants to share provider directory information.

[7] It is noteworthy to point out here that each LDS may establish its own local policy regarding how it will respond to a wild card query and/or other requests. The drafting team did not believe a common policy needed to be defined on this subject but that each institution should be able to choose how it elects to respond.

    e. HIO shall adhere to the HPD specifications as amended by CP-ITI-601 (currently pending final publication in the ITI) or the IWG's HPD+ v1.1.

2. Data Elements[8]:
    a. HIO acknowledges, for the purposes of the CHeQ CTF Pilot, there is no minimum data requirement that an LDS must have to be permitted to onboard.
    b. HIO acknowledges, for the purposes of the CHeQ CTF Pilot, there is no minimum set of data elements that must be returned in response to any queries.

3. Auditing:
    a. HIO shall maintain an audit log that captures the date, time, querying organization, requestID (per the HPD specification[9]), and query filter for each query received[10].
    b. HIO shall maintain a log of all Provider Directory access, both by its Authorized End Users, as well as by external systems, including the SDS.
       i. At a minimum, this log must contain the date/time stamp of the access/query, which system/user made the query, requestID (per the HPD specification), query filter and any errors related to the query.
      ii. These audit logs must be made available for inspection upon request per appropriate state and federal laws and regulations.

4. Service Registry Facing:
    a. An HIO that is onboarded to the CHeQ CTF Pilot for the Federated Provider Directory Services acknowledges that all other CHeQ CTF Pilot Participants may access and request information on Directory Services for which the HIO has been onboarded via the CHeQ CTF Services Registry.
    b. HIOs Onboarded for the Provider Directory shall provide accurate service endpoint information to the Services Registry Manager for the Provider Directory LDS.
    c. Onboarded HIOs shall coordinate any changes to service endpoint information to the Services Registry Manager prior to making change.
    d. Onboarded HIOs may cache Services Registry information, but shall not provide cached information to others.
    e. Onboarded HIOs that cache Services Registry information shall refresh their cache:
       i. Automatically at least every 24 hours, or
      ii. Manually every time an update alert is sent by the Services Registry Manager.

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[8] There is insufficient experience to determine what data elements are necessary at this point in time. It is the hope of the CHeQ CTF Pilot to learn what if any data elements end-users need to have in place to make a federated solution work. We may also learn that it is not necessary to specify a minimum.
[9] HPD specification as amended by CP-ITI-601 (currently pending final publication in the ITI) or IWG's HPD+ v1.1 is acceptable.
[10] Put another way, HIOs shall maintain appropriate auditing of all queries to the CHeQ CTF Pilot Provider Directory.

Definitions of Terms Used:

The Service
The Service is the query responder, the local technical provider directory and/or web service. The Service may include the query client, the SDS or the LDS.

Relying Party
A Relying Party is the Authorized User or entity that runs the query and relies on data from the service.

Query Responder
The Query Responder is the service that provides the requested data.

State Directory Service (SDS)
A State Directory Service is the directory service in California's federated provider directory architecture responsible for orchestrating queries among local directories and NATE party states.

Local Directory Service (LDS)
A Local Directory Service is a directory service in California's federated provider directory architecture that manages information of local providers and organizations, and supports discovery of Direct addresses and/or individual and organizational service endpoints. An LDS is often associated with a Direct HISP or Exchange gateway.

UCDAVIS
INSTITUTE FOR POPULATION HEALTH IMPROVEMENT
California Health eQuality

California Trust Framework Pilot—Federated Provider Directory Policies

ONBOARDING FORM

Main Point of Contact	
Name:	Organization:
Telephone Number:	Mobile:
Email:	
Physical Address:	

Information to be Listed in the CTF Services Registry	
Point of Contact (if different from above):	Organization Name (if different from above):
Email for POC (if different from above):	Phone Number of POC (if different from above):
LDS Web Service Address:	
Organization's Object Identifier (OID):	

This form is generated from the Federated Provider Directory Policies for InterHIO Exchange[1] that documents the Obligations and policy requirements that a California Health eQuality (CHeQ) California Trust Framework (CTF) Pilot Participant is required to satisfy as part of the onboarding process to Phase 2 of the Pilot. The Federated Provider Directory Policies for InterHIO Exchange was iteratively produced by a collaborative process involving the approved Federated Provider Directory Track Phase 1 Pilot HIO Participants who are bound by the contract that funded their participation. Further context and background regarding how this artifact fits into the Pilot can be found here: http://cheq.wikispaces.com/Trust+Framework

Please submit (1) a completed Federated Provider Directory Onboarding Form; and (2) any additional evidence in support of the Obligations, to Rupinder Colby at rcolby@ohi.ca.gov.

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[1] Federated Provider Directory Policy for InterHIO Exchange.docx

Obligations of the Parties

Many of the policy requirements identified here are satisfied by the terms and conditions of an HIO's Participant Agreement with its clients. There are many ways that such terms and conditions can be written into contracts. To facilitate the process, the Phase 1 Pilot Participants have attempted to describe the policy domain to be covered by relating the respective obligations to the relationships encompassed by the flow-downs implied in the policy requirements.

For the purposes of the Trust Framework we have defined four Parties (**HIO**, the HIO's **Participant(s),** the Participant's **Authorized End User(s)** and **CHeQ**) within the scope of the policy domain under consideration. Among these Parties, we capture the policy requirements of the CHeQ CTF Pilot, as an obligation between two parties (for example, between the HIO and the Participant) and what obligations exist between Parties where some of the obligations are placed on one Party by another wherein that Party requires its subordinates to satisfy an obligation as a flow down (for example, where the HIO obligates the Participant to require the Participant's Authorized End Users to fulfill specific requirements). *For definitions of the terms used in this document please refer to the aforementioned Federated Provider Directory Policies for InterHIO Exchange document.*

A. Obligations of the State Directory Service and Local Directory Service

Obligation	Method of Attestation	Please provide a description of how your organization satisfies this Obligation and attach any additional documentation or evidence as necessary
1. The Service shall not store or distribute protected health information (PHI).	☐Self-Attestation ☐Formal Accreditation/ Certification ☐Other	
2. The Service shall provide appropriate error responses to the relying party when the relying party does not behave as the service expects.	☐Self-Attestation ☐Formal Accreditation/ Certification ☐Other	
3. Each Pilot Participant acknowledges that Pilot Participants reserve the right to constrain query results based on local policy.	☐Acknowledge	
4. The Service shall maintain sufficient information in a log that can be used to recreate the request from a relying service: a. The log shall record the conditions necessary to reproduce the output generated at the time the relying party submitted the request.	☐Self-Attestation ☐Formal Accreditation/ Certification ☐Other	

Obligation	Method of Attestation	Please provide a description of how your organization satisfies this Obligation and attach any additional documentation or evidence as necessary
5. The Service shall make the frequency with which the contents of its offering are refreshed, if it provides data that change over time, discoverable to relying parties. a. The Service shall include a 'last updated' date if the service's system supports such a record. b. The Service shall update the contents of its offering within 72 hours of becoming aware of a change.	☐Self-Attestation ☐Formal Accreditation/ Certification ☐Other	
6. The Service shall adopt a policy of mutual TLS authentication.	☐Self-Attestation ☐Formal Accreditation/ Certification ☐Other	

B. Obligations of the HIO

1. Business Process Policies

Obligation	Method of Attestation	Please provide a description of how your organization satisfies this Obligation and attach any additional documentation or evidence as necessary
a. HIO shall maintain accuracy and currency of Provider Directory contents, including source of content. *It is sufficient, to satisfy this Obligation, to answer the question "What is the manner in which the records in your LDS are populated."*	☐Self-Attestation ☐Formal Accreditation/ Certification ☐Other	
b. HIO shall not make available, through the CHeQ CTF Pilot Provider Directory, information that it does not have the authority to make available to other HIOs.	☐Self-Attestation ☐Formal Accreditation/ Certification ☐Other	
c. HIO acknowledges that it is not required to respond to a query that may violate local policy.	☐Acknowledge	
d. HIO acknowledges that access to the CHeQ CTF Pilot Provider Directory is restricted to providers, provider organizations and/or authorized provider agents.	☐Acknowledge	

Obligation	Method of Attestation	Please provide a description of how your organization satisfies this Obligation and attach any additional documentation or evidence as necessary
e. HIO shall adhere to the HPD specifications as amended by CP-ITI-601 (currently pending final publication in the ITI) or the IWG's HPD+ v1.1.	☐ Self-Attestation ☐ Formal Accreditation/ Certification ☐ Other	

2. Data Elements

Obligation	Method of Attestation	Please provide a description of how your organization satisfies this Obligation and attach any additional documentation or evidence as necessary
a. HIO acknowledges, for the purposes of the CHeQ CTF Pilot, there is no minimum data requirement that an LDS must have to be permitted to onboard.	☐ Acknowledge	
b. HIO acknowledges, for the purposes of the CHeQ CTF Pilot, there is no minimum set of data elements that must be returned in response to any queries.	☐ Acknowledge	

3. Auditing

Obligation	Method of Attestation	Please provide a description of how your organization satisfies this Obligation and attach any additional documentation or evidence as necessary
a. HIO shall maintain an audit log that captures the date, time, querying organization, requestID (per the HPD specification), and query filter for each query received.	☐ Self-Attestation ☐ Formal Accreditation/ Certification ☐ Other	
b. HIO shall maintain a log of all Provider Directory access, both by its Authorized End Users, as well as by external systems, including the SDS. 　i. At a minimum, this log must contain the date/time stamp of the access/query, which system/user made the query, requestID (per the HPD specification), query filter and any errors related to the query. 　ii. These audit logs must be made available for inspection upon request per appropriate state and federal laws and regulations.	☐ Self-Attestation ☐ Formal Accreditation/ Certification ☐ Other	

4. Services Registry Facing

Obligation	Method of Attestation	Please provide a description of how your organization satisfies this Obligation and attach any additional documentation or evidence as necessary
a. An HIO that is onboarded to the CHeQ CTF Pilot for the Federated Provider Directory Services acknowledges that all other CHeQ CTF Pilot Participants may access and request information on Directory Services for which the HIO has been onboarded via the CHeQ CTF Services Registry.	☐Acknowledge	
b. HIOs Onboarded for the Provider Directory shall provide accurate service endpoint information to the Services Registry Manager for the Provider Directory LDS.	☐Self-Attestation ☐Formal Accreditation/ Certification ☐Other	
c. Onboarded HIOs shall coordinate any changes to service endpoint information to the Services Registry Manager prior to making change.	☐Self-Attestation ☐Formal Accreditation/ Certification ☐Other	
d. Onboarded HIOs may cache Services Registry information, but shall not provide cached information to others.	☐Self-Attestation ☐Formal Accreditation/ Certification ☐Other	

Obligation	Method of Attestation	Please provide a description of how your organization satisfies this Obligation and attach any additional documentation or evidence as necessary

e. Onboarded HIOs that cache Services Registry information shall refresh their cache:
   i. Automatically at least every 24 hours, or
   ii. Manually every time an update alert is sent by the Services Registry Manager.
	☐ Self-Attestation
	☐ Formal Accreditation/ Certification
	☐ Other	

My signature below affirms that the above information is true, complete and accurate, and that I am authorized to execute this Federated Provider Directory Onboarding Form for InterHIO Exchange on behalf of the designated organization. I understand that Pilot Participants' self-attestation to the Obligations will NOT be further verified by CHeQ, CalOHII or CAHIE for purposes of the Pilot.

_____

Printed Name

_____　　_____

Signature　　　　　　　　　　　　　　　　　　　　　　**Date**