

HISPC Recommendations: Local versus State Responsibilities

A. State Responsibilities:

1. Has the capacity to integrate all local/ regional RHIOs
2. Authenticates each RHIO and certifies that their business practices meet state requirements.
3. Maintains legal documentation with each RHIO to facilitate HIE statewide
4. Provides the state with a real time interface with licensing bodies for providers
5. Establishes a set of standard roles for user access
6. Educates consumers and providers
7. Educates legislators
8. Advocates for legislative and rule changes to facilitate HIE
9. Advocates for funding for to facilitate HIE

B. Local RHIO responsibilities

1. Authentication of organizations and users
2. Maintenance of all legal agreements with member organizations
3. Maintains HIPAA privacy notices for the exchange
4. Maintains and monitors best practice in privacy and security to the end user level
5. Provides an interoperable standards based interface for systems that have existing EHRs and provides a no frills patient centric comprehensive electronic health record for practices that cannot afford such systems (CCR compliant)
6. Monitors system wide security exchange protocols
7. Provides an audit trail across organizations for either the virtual or central record
8. Provides failover back up for essential systems in the event of an emergency
9. Maintains an open inclusive organization that supports community, consumer, safety net, and provider participation in all processes
10. Educate consumers and providers
11. Provide end user feedback to facilitate clinical adoption
12. Training in use of HIE and HIT components
13. Monitoring proficiency of users in the use of HIT/HIE
14. Monitors accuracy of data

C. Member responsibilities:

1. Maintain security risk analyses and perform audits*
2. Assure that all users have appropriate training and feedback on correct use*
3. Pay any fees, dues or licensing
4. Provide site administration of user authentication and validate licensure and role to RHIO
5. Include the RHIO in HIPAA privacy notice
6. Maintain training and all legal agreements to insure HIPAA compliance

*Could be delegated to local/ regional RHIO for small practices