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| <h1>P3N Policy #3</h1> <h2>Certification Policy and Process</h2> <h3>PA eHealth Partnership Program</h3> | |
| Subject: P3N Certification Policy and Process | Version: v.4b |
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| Related Documents: | -P3N Application For Participation v.4c -Terms and Definitions -Security Policy -Pennsylvania eHealth Partnership Program Uniform Participant Agreement v.4c |

1. **PURPOSE.** This document establishes the policies and processes for certifying a Health Information Organization (HIO) to become a Certified Participant (CP) and to onboard to the Pennsylvania Patient & Provider Network (P3N).
2. **SCOPE.** This document applies to PA eHealth and all HIOs interested in becoming CPs and connecting to the P3N, as well as all current CPs who are required to re-certify annually.
 - 2.1. This policy is intended to be consistent with and does not replace or supersede any federal regulations or laws (such as Health Insurance Portability and Accountability Act (HIPAA) and Health Information Technology for Economic and Clinical Health Act (HITECH)) or state privacy and security laws and regulations.
3. **OBJECTIVES.** The objective of this policy is to:
 - 3.1. Ensure that Pennsylvania citizens may rely on the services of HIOs certified by PA eHealth to deliver health care information safely and securely to their member organizations.
 - 3.2. Foster interoperability and trust among CPs in the P3N.
 - 3.3. Provide that CPs are in compliance with all state and federal laws and regulations.
4. **POLICY**
 - 4.1. **Application for Certification**
 - 4.1.1. Organizations interested in becoming certified with PA eHealth for participation in the P3N are required to complete and submit the Documentation listed in the P3N Application for Participation. The

Certification Package includes, but may not be limited to, the following documents:

- 4.1.1.1. P3N Application for Participation
- 4.1.1.2. Uniform Participant Agreement (PAR)
- 4.1.1.3. P3N Technical Requirements
- 4.1.1.4. P3N Policies (as referenced in the P3N Application for Participation)
- 4.1.1.5. Third-party Security Audit and HIPAA Risk Assessment
- 4.1.1.6. Proof of Insurance as required by the PAR
- 4.1.2. PA eHealth will review the Documentation received for completeness and appropriate signatures. If questions or concerns arise, PA eHealth will arrange for a conversation with the applying HIO to discuss and resolve those issues. The following general eligibility requirements will be validated:
 - 4.1.2.1. The P3N Application for Participation has been completed and signed.
 - 4.1.2.1.1. Attested to comply with P3N Technical Requirements
 - 4.1.2.1.2. Attested to comply with P3N Policies
 - 4.1.2.2. The P3N Uniform Participant Agreement (PAR) has been signed by an official authorized to bind the organization.
 - 4.1.2.3. The organization provided an executive summary of a third-party Security Audit and HIPAA compliant risk assessment. Refer to Policy #10 Security Policy regarding proof of security certification.
 - 4.1.2.4. The organization will provide proof of insurance as required by the PAR.
- 4.1.3. Provisional Certified Participant
 - 4.1.3.1. Upon receipt of the Application for Participation, PA eHealth will review for completeness and appropriate signatures within 10 business Days.
 - 4.1.3.2. If the application is deemed sufficient PA eHealth will notify the applicant of provisional certification and notify the Health Information Exchange Trust Community Committee (HIETCC) there is a new provisionally certified participant
 - 4.1.3.3. PA eHealth will review the relevant portions of the Application with HIETCC at the next HIETCC meeting. The applicant will be invited to attend this meeting.

- 4.1.3.4. If there are questions that arise from the review with the HIETCC, PA eHealth will work with the Applicant on answering them.
- 4.1.4. Once Provisional CP status is granted, PA eHealth will schedule initial onboarding calls with the HIO to outline the technical onboarding process and draft a timeline for completion. Prior to submitting a signed PAR, the applicant will be able to start technical discussions with PA eHealth to determine connection type and capability. Once the applicant signs and returns the PAR, they will be able to connect to the test environment and complete the interoperability testing phase of the onboarding process. The HIO, however, will not be able to move into the P3N production environment until the PAR has been fully executed (fully executed means that the agreement has been fully signed by all parties within the commonwealth). While the PAR is going through the execution phase within the commonwealth, PA eHealth will perform the following review of the Application documents:
 - 4.1.4.1. The P3N Application for Participation will be reviewed to verify that all questions have been affirmatively answered.
 - 4.1.4.2. PA eHealth will review the third-party Security Audit and HIPAA Risk Assessment overview.
 - 4.1.4.3. If questions or concerns arise, PA eHealth may choose to schedule a meeting with the organization to address the concerns. PA eHealth will collaborate with the Health Information Exchange Trust Community Committee (HIETCC), as appropriate, for additional review and discussion. Note that confidential information will not be disclosed to the HIETCC without the consent of the organization.
 - 4.1.4.4. If an organization's application is approved, PA eHealth will notify it, and the organization will receive a copy of the fully executed PAR.
 - 4.1.4.5. If an organization's application is rejected, PA eHealth will notify it, and provide the supporting rationale for such decision. An organization whose application has been rejected may re-apply at any time.
 - 4.1.4.6. If disputes arise during this process, they will be handled using the Dispute Resolution Process included in the PAR.
- 4.1.5. The HIO will be considered certified when all of the following have been completed:
 - 4.1.5.1. The PAR has been fully executed.
 - 4.1.5.2. The P3N Application for Certification and all associated documents have been reviewed and approved as to compliance.

- 4.1.5.3. The organization has provided executive summary of third-party Security Audit and HIPAA Risk Assessment. Refer to Policy #10 Security Policy regarding proof of security certification.
- 4.1.5.4. The organization has produce proof of insurance in compliance with the PAR
- 4.1.5.5. The HIO has completed the interoperability testing and the production validation testing.

4.2. **Certification Renewals**

- 4.2.1. The PAR will renew automatically on an annual basis, pending re-certification by the CP as outlined here.
- 4.2.2. At least one hundred and twenty (120) Days prior to the end of the current certification period, PA eHealth will notify the CP that re-certification is required.
 - 4.2.2.1. The CP will submit to PA eHealth any changes from the original application, proof of insurance as required by the PAR, and evidence of its most recent third-party Security Audit and HIPAA risk assessment (dated within twelve (12) months of the renewal date). Refer to Policy #10 Security Policy regarding proof of security certification. The CP will have sixty (60) calendar days to submit this information. If more time is required, the CP must notify PA eHealth within thirty (30) days with a request for an extension.
- 4.2.3. Upon receipt of updated Documentation, PA eHealth will have thirty (30) days to review and authorize the CP for re-certification, using the same steps outlined in Section 4.1.3. above.
- 4.2.4. If the CP is approved for re-certification, PA eHealth will provide such notice to the CP within five (5) Days, and the PAR will automatically renew for an additional year.
- 4.2.5. If PA eHealth discovers issues or concerns with the re-certification, PA eHealth will confer with the CP to address and resolve the issues appropriately. The CP will be given the opportunity to address and correct any deficiencies.
- 4.2.6. If the CP is not approved for re-certification, PA eHealth will provide such notice to the CP within five (5) Days. The CP shall be given up to ninety (90) days to correct any issues if notice is provided prior to the end of the certification year.

- 4.2.7. If the re-certification is not approved, the CP will be disconnected from the P3N, shared data may be removed, and the PAR will be suspended or terminated in accordance with the terms and conditions of the PAR.
- 4.2.8. If disputes arise during this process, they will be handled using the Dispute Resolution Process included in the PAR.
- 4.2.9. If issues cannot be resolved, the PAR and Certification will terminate as per the applicable provisions of the PAR.