The Mass HIway Connection Requirement:  
*Overview of the Year 1 requirement*

May 2017
Today’s presenters

Michael Chin, MD  
Mass Health Senior Policy Analyst  
Assistant Professor, Department of Family Medicine & Community Health, University of Massachusetts Medical School  
Michael.Chin@umassmed.edu

Murali Athuluri  Lead Mass HIway Account Manager  
Executive MBA with Value Measurement in Healthcare, Harvard Business School  
mathuluri@maehc.org

This presentation has been reviewed and approved by the Mass HIway, and the presenters are acting as authorized representatives of the Mass HIway.

The information provided in this presentation is for general information purposes only, and in no way modifies or amends the statutes, regulations, and other official statements of policy and procedure that govern access to and use of the Mass HIway.
Mass HIway webinars

- Past webinars and presentations are available on the HIway website [www.masshiway.net](http://www.masshiway.net)
- Go to “News and Events” and then select “Events”
About the MA HIway Account Management Team:

- Massachusetts eHealth Collaborative (MAeHC) was selected by EOHHS through an open bid process to serve as the Mass HIway’s Account Management team.

- Working in partnership with the Mass HIway, our team delivers outreach, education, and on-site user support services to the provider community and participants, with a goal of increasing adoption and effective utilization of the Mass HIway across the Commonwealth.

- The Mass HIway Account Management Team includes:
  - Mark Belanger
  - Murali Athuluri
  - Len Levine
  - Jennifer Monahan
  - Kelly Luchini
If your organization is interested in connecting to the Mass Hiway contact any member of the Mass Hiway Account Management Team:

- Enrollment
- Onboarding
- Addressing
- Connection steps
- Use case identification
- Exchanging with your trading partners

Murali Athuluri  
Lead Hiway Acct. Manager  
(781) 296-3857  
mathuluri@maehc.org

Len Levine  
LLevine@maehc.org

Kelly Luchini, PMP  
Kluchini@maehc.org

Jennifer Monahan  
JMonahan@maehc.org
Using the Mass HIway is as easy as 1-2-3!

1. **Ask your vendor** if they are connected to, or able to connect to the HIway.
2. **Contact us.** We will connect you with a Mass HIway Account Manager to get your organizations enrolled and connected.
3. **Exchange** with your trading partners!

The Massachusetts Health Information Highway (Mass HIway)

*Phone:* 1.855.MA-HIWAY (1.855.624.4929)
*Email for General Inquires:* MassHIway@state.ma.us
*Email for Technical Support:* MassHIwaySupport@state.ma.us
*Website:* www.MassHIway.net
1. Introduction to the Mass HIway and the Mass HIway Regulations
2. Overview of the HIway connection requirement
3. Year 1 of the HIway connection requirement
4. Conclusion
The Mass HIway is the statewide, state-sponsored Health Information Exchange (HIE) operated by the Executive Office of Health and Human Services (EOHHS).

- **Mission:** The mission of the Mass HIway is to enable health information exchange by health care providers and other Mass HIway Users regardless of affiliation, location or differences in technology.

- **The Mass HIway has two core functions:**
  
  - **Function #1 – HIway Direct Messaging:**
    i.e., a secure method of sending a transmission from one Mass HIway User to another, where the HIway does not use, analyze or share information in the transmissions
  
  - **Function #2 – HIway-Sponsored Services:**
    i.e., services such as the forthcoming state-wide Event Notification Service (ENS), where the HIway may use, analyze, and/or share the minimal amount of information necessary to conduct the service, on behalf of HIway Participants

- **The Mass HIway does not currently function as a clinical data repository**

- **The Mass HIway provides health information exchange across the state:**
  
  - Over 1,000 HIway Participants, including organizations across the care continuum (including hospitals from 60+ organizations, ambulatory providers, long-term care facilities)
HIway Direct Messaging offers a secure method for transmitting messages between HIway Users for a wide variety of use cases

- In April 2017, over 7 million HIway Direct Messages were transmitted per month
  - This included over 200,000 Provider-to-Provider transmissions (an 18% increase from April 2016)

- Mass HIway Direct Messaging allows secure transmission of information to support a wide variety of use cases, within several categories.
  - Use case categories include: Public Health Reporting, Provider-to-Provider Communications, Payer Case Management, Quality Reporting (as per the Mass HIway Policies & Procedures)

- HIway Users can connect to the Mass HIway by one of several connectivity options. This has supported broad participation in the Mass HIway.
  - HIway Participants can connect to the Mass HIway by several methods:
    - Direct EHR connection
    - a Local Access for Network Distribution (LAND) appliance connection
    - a HIway Trusted Health Information Service Provider (HISP)
    - a Webmail connection, which does not require an EHR
  - As a result of the multiple connectivity options the Mass HIway currently works with more than 44 EHR vendors, 23 HISPs, and 7 integration engines, through 13 deployment variations.
The main purpose of the Mass HIway Regulations is to:

- Establish requirements for organizations that use the Mass HIway
- Implement the state statutory requirement for providers to connect to the Mass HIway (which is referred to in this presentation as the HIway connection requirement)
- Establish the mechanism to allow patients to opt-in and opt-out of the Mass HIway

- The regulations require that information be transmitted via HIway Direct Messaging in compliance with applicable federal and state privacy laws and implementing regulations, and thereby aligns the use of HIway Direct Messaging with other modes of transmission (e.g., sending information by fax or phone).

- The Mass HIway Regulations went into effect on February 10, 2017.

- In March 2017, EOHHS and the Mass HIway released supporting documents related to the Mass HIway Regulations:
  - Mass HIway Regulations Summary
  - Mass HIway Regulations FAQs
  - Mass HIway Policies & Procedures (version 3)
  - Mass HIway Fact Sheet for Patients

- In April 2017, the HIway hosted a Mass HIway Regulations Overview (via webinar)
1. Introduction to the Mass HIway and the Mass HIway Regulations

2. Overview of the HIway connection requirement

3. Year 1 of the HIway connection requirement

4. Conclusion
HIway connection requirement

The HIway connection requirement is implemented using a phased-in approach.

The phased-in approach has four aspects:

1. **Three types of Provider Organizations (i.e., Acute Care Hospitals, Large & Medium Medical Ambulatory Practices, Community Health Centers) have connection dates that are specified in the regulations.**

   EOHHS anticipates that Provider Organizations which are not specified in the regulations will be required to connect at a future date, with future guidance providing at least one year notice for affected organizations to connect.

2. **The three types of Provider Organizations have an initial “Year 1” connection requirement between 2017 and 2019.**

3. **How Provider Organizations fulfill the HIway connection requirement is phased-in over four years, with penalties for not meeting the requirement beginning in Year 4.**

4. **The statutory requirement that providers implement “interoperable EHR systems” that connect to the Mass HIway is fulfilled by implementing HIway Direct Messaging.**
Provider Organizations

Section 20.06 of the Mass HIway Regulations provide the definitions of the Provider Organizations that have HIway connection dates specified in the regulations.

- **Acute Care Hospital:**
  - hospital licensed under M.G.L. c111 s.51, and the teaching hospital of UMass Medical School
  - see the *List of Health Care Facilities Licensed or Certified by the Division* available [here]. *

- **Medical Ambulatory Practice:**
  - an organization that includes licensed providers who provide primary or specialty outpatient health care
  - *Large Medical Ambulatory Practice*: more than 50 licensed providers
  - *Medium Medical Ambulatory Practice*: 10 to 50 licensed providers
  - *Small Medical Ambulatory Practice*: less than 10 licensed providers

- **Community Health Center (CHC):**
  - A Federally Qualified Health Center (FQHC) or a FQHC look-alike (as defined by HRSA), or
  - An organization that files cost reports as a CHC, as requested by the Health Policy Commission
  - *Large CHC*: 10 or more licensed providers
  - *Small CHC*: less than 10 licensed providers

*This list is referred to as the *Massachusetts Licensed or Certified Health Care Facility/Agency Listing* in Section 20.06 of the Regulations*
Section 20.06 of the Mass HIway Regulations provides details regarding the definitions that are mentioned in the previous slide. These details include the following:

- **Licensed providers**: For the definitions in Section 20.06 of the regulations, *licensed providers* are limited to include medical doctors, doctors of osteopathy, nurse practitioners, or physician assistants.

- **How to calculate the number of licensed providers**: For the purposes of the regulations, the number of licensed providers that a Provider Organization has is calculated based on the number of licensed providers that provide health care services to patients on behalf of the provider organization in the month of June prior to that organization’s initial required connection date to the Mass HIway, regardless of employment status.
The HIway connection requirement follows a four-year phased-in approach that progressively encourages use of the Mass HIway for Provider-to-Provider communications and bi-directional exchange of health information.

**How Provider Organizations connect:**

- **Year 1:** Send or receive HIway Direct Messages for *at least one use case.* The use case may be within *any category* of use cases.
- **Year 2:** Send or receive HIway Direct Messages for *at least one use case that is within the Provider-to-Provider Communications category* of use cases.
- **Year 3:** Send HIway Direct Messages for at least one use case, and also receive HIway Direct Messages for at least one use case. Both of these uses cases should be within the **Provider-to-Provider Communications category** of use cases.
- **Year 4:** The provider organization may be subject to penalties, if that organization has not met the requirements established in this section. Penalties do not take effect until Year 4 of the connection requirement (i.e., in January 2020, at the earliest).

**Acute Care Hospitals:** In addition to using HIway Direct Messaging, Acute Care Hospitals are also required to send Admission Discharge Transfer notifications (ADTs) to the Mass HIway within 12 months of the ENS' launch as a part of the HIway connection requirement.
1. Introduction to the Mass HIway and the Mass HIway Regulations

2. Overview of the HIway connection requirement

3. Year 1 of the HIway connection requirement

4. Conclusion
In 2017, Acute Care Hospitals are the only provider organizations required to connect to the Mass HIway and to submit the Year 1 Attestation Form. Other organizations have these requirements in later years.

**Who & When:** Provider organizations that have HIway connection dates that are specified in the regulations are required to submit a Year 1 Attestation Form by July 1st after their initial HIway connection requirement.

<table>
<thead>
<tr>
<th>Provider Organization</th>
<th>Date of the “Year 1” HIway connection requirement</th>
<th>Due date of the Year 1 Attestation Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acute Care Hospitals</td>
<td>February 10, 2017</td>
<td>July 1, 2017</td>
</tr>
<tr>
<td>Large and Medium Medical Ambulatory Practices</td>
<td>January 1, 2018</td>
<td>July 1, 2018</td>
</tr>
<tr>
<td>Large Community Health Centers</td>
<td>January 1, 2018</td>
<td>July 1, 2018</td>
</tr>
<tr>
<td>Small Community Health Centers</td>
<td>January 1, 2019</td>
<td>July 1, 2019</td>
</tr>
</tbody>
</table>

**How:** Year 1 Attestation Forms should be submitted to the Mass HIway (via email at: MassHIwayAttestation@state.ma.us)

• The Year 1 Attestation Form (&instructions) are available on the Mass HIway web page in two places (i.e., as Appendix B in the HIway Policies & Procedures (version 3) and as a stand-alone PDF document)
The Year 1 Attestation Form is available at the Mass HIway website: www.masshiway.net

Go to “Resources” and then select “Participant Forms”
The Year 1 Attestation Form collects the following information:

1. How the organization met the Year 1 HiWay connection requirement:
   - The Year 1 requirement: To send or receive HiWay Direct Messages for at least one use case (The use case may be within any category of use cases)
   - Questions on the attestation form include:
     - The use case is within what category of use cases?
       Categories include: (1) Provider-to-Provider Communications, (2) Payer Case Management, (3) Quality Reporting, (4) Public Health Reporting, (5) Other
     - Describe the use case
     - Approximate # of HiWay Direct Messages per month for the use case

2. Describe whether or not the organization has an EHR (and if so, how does it connect to the HiWay):
   - Questions on the attestation form include:
     - Name and version of the EHR?
     - Is the EHR an ONC Certified Health IT Product?
     - How is the organization connecting to the HiWay?
       Options include: (1) EHR directly to HiWay, (2) EHR via a HISP, or (3) via Mass HiWay webmail
The Year 1 Attestation Form is available here:
The following slides walk through each of the questions on the Year 1 Attestation Form

1. Name of the Provider Organization: ____
   • *Example*: George Washington Hospital

2. Street Address of the Provider Organization: ____
   • Please provide the street address of the Provider Organization
   • In some cases, the street address may be different than the address of the administrative offices of the Provider Organization

3. Provider Organization Tax ID (TIN): ____
   • This information is needed to help identify the Provider Organization that is completing the attestation form.
4. Description of the Use Case that has been implemented to meet the Year 1 connection requirement:

a) Descriptive name for the Use Case: _____

b) Date that the Use Case was implemented (MM/YYYY): ____

c) Category of Use Case (select only one):
   - Provider to Provider Communications
   - Payer Case Management
   - Quality Reporting
   - Public Health Reporting
   - Other (please specify) ________

d) Does this Use Case involve the Provider Organization sending a HIway Direct Message, or receiving a HIway Direct Message, or both? (Select only one of the three following options):
   - The Use Case involves the Provider Organization sending, but not receiving a HIway Direct Message.
   - The Use Case involves the Provider Organization receiving, but not sending a HIway Direct Message.
   - The Use Case involves the Provider Organization both sending and receiving a HIway Direct Message.
e) Name of the other entity (or entities) participating in the exchange of information for the Use Case: ___

Please check the box below, to confirm that you have coordinated with the other entity (or entities) for this Use Case, in order to establish that the other entity is receiving and able to use the transmission.

☐ The Provider Organization attests that the work flow or process for this Use Case has been coordinated with the other entity (or entities) listed in 4(e).

f) Describe the scope of the activity addressed by the Use Case: ____

g) Describe the scope of the organization(s) involved in the Use Case: ____

h) Approximate expected message volume per month. _____
5. EMR / EHR system that the Provider Organization is currently using:
   a) Is your Provider Organization using an Electronic Medical Record (EMR) or an Electronic Health Record (EHR) system for the Use Case described in the previous question (yes / no)

   If the answer to question 5a is “yes”, then answer questions 5b through 5e:
   b) Name of the EMR / EHR system: _______.
   c) Version of the EMR / EHR system: _______.
   d) How is the EMR / EHR system connecting to the Mass HIway (please select only one):
      - directly to the Mass HIway
      - via a HISP other than the Mass HIway
   e) Is the EMR / EHR system an ONC Certified Health IT Product (yes / no): _____

   If the answer to question 5a is “no”, then answer questions 5f:
   f) How is your Provider Organization connecting to the Mass HIway (please select all that apply):
      - via Mass HIway Webmail
      - via some other method (please specify) _________________
6. **Contact information** for the person(s) at the Provider Organization if the Mass HIway has technical or operational questions regarding this Attestation form: (up to 3 persons may be listed)

7. **Signature**: As an authorized representative of the Provider Organization listed in Question #1, above, I attest that I am authorized to complete and submit this Attestation Form, that I have read the questions, and that the information submitted is true and correct.
Questions about the Year 1 Attestation Form should be sent via email to: MassHIway@state.ma.us, with the subject line of “Year 1 Attestation Form”

Completed Year 1 Attestation Forms should be sent via email to: MassHIwayAttestation@state.ma.us

The Mass HIway will send an email notification confirming receipt of the Year 1 Attestation Form.
1. Introduction to the Mass HIway and the Mass HIway Regulations
2. Overview of the HIway connection requirement
3. Year 1 of the HIway connection requirement
4. Conclusion
Past HIway webinars are available on the Mass HIway website:

- Go to the Mass HIway website at www.masshiway.net
- Then, go to “News & Events” and next select “Events”

Upcoming Mass HIway events and webinars:

- **Mass HIway Webinars:** (all webinars are Thursdays, noon-1pm)
  - June 8, 2017: Improving Care Coordination by Leveraging Mass HIway Direct Messaging
  - June 22, 2017: Mass HIway 101
  - June 29, 2017: ENS Update for the community
Thank you!

The Massachusetts Health Information Highway (Mass HIway)

Phone: 1.855.MA-HIWAY (1.855.624.4929)
Email for General Inquires: MassHIway@state.ma.us
Email for Technical Support: MassHIwaySupport@state.ma.us
Website: www.MassHIway.net
Appendix A:

Selected slides from the HIway Regulations Overview, presented at the April 2017 Mass HIway Webinar
## Use Cases for HIway Direct Messaging

<table>
<thead>
<tr>
<th>Use Case Categories</th>
<th>Example Use Cases</th>
</tr>
</thead>
</table>
| **Provider-to-Provider Communications** | • Hospital sends a discharge summary to a Skilled Nursing Facility (SNF) or Long Term/Post Acute Care (LTPAC) facility  
• Primary Care Provider (PCP) sends a referral notice to a specialist  
• Specialist sends consult notes & updated medications list to patient’s PCP  
• Hospital ED requests a patient’s medical record from a PCP  
• PCP sends a CCD or C-CDA with Problems, Allergies, Medications, and Immunizations (PAMI) to a Hospital caring for their patient |
| **Payer Case Management**            | • ACO sends quality metrics to a payer  
• Provider sends lab results to a payer  
• Provider sends claims data to payer                                                                                                                                                                                                                                                                 |
| **Quality Reporting**                | • Provider sends clinical data to Business Associate for quality metrics analysis  
• Provider sends quality metrics to Business Associate for report preparation                                                                                                                                                                                                                                                                     |
| **Public Health Reporting**         | • **Provider sends to DPH:**  
  o Massachusetts Immunization Information System (MIIS)  
  o Syndromic Surveillance (SS)  
  o Opioid Treatment Program (OTP)  
  o Childhood Lead Paint Poison Prevention Program (CLPPP)  
  
• **Provider sends to other agencies:**  
  o Occupational Lead Poisoning Registry (Adult Lead)  
  o Children’s Behavioral Health Initiative (CBHI)                                                                                                                                                                                                                                                                 |


The regulations describe what information may be transmitted via HIway Direct Messaging

- Information may be transmitted via HIway Direct Messaging in compliance with applicable federal and state privacy laws and regulations (e.g., HIPAA, 42 CFR Part 2, M.G.L. Chapter 93H).
- This aligns the use of HIway Direct Messaging with other modes of transmission (e.g., sending information by fax or phone).
- Mass HIway Users have the option of implementing a local opt-in and/or opt-out process that applies to the use of HIway Direct Messaging by their organization.
The regulations describe that an **opt-in opt-out mechanism for HIway-Sponsored Services** will be implemented and operated by the Mass HIway once these services are launched by the Mass HIway.

- **Opt-in by written notice:** The opt-in mechanism will be fulfilled by HIway Participants informing patients through written notice how the HIway Participant intends to use HIway-Sponsored Services, and how the patient can opt-out of HIway-Sponsored Services.

- **Centralized opt-out:** The Mass HIway or its designee will administer a centralized opt-out system for HIway-Sponsored Services that will implement a mechanism for individuals to choose not to participate in HIway-Sponsored Services.

- **Supplemental local processes:** HIway Participants can elect to implement additional local opt-in and/or opt-out processes that apply to their organization's use of HIway-Sponsored Services; these additional processes must supplement and not replace the HIway's opt-in opt-out mechanism.
Implications for stakeholders

For patients:

- Key information for patients about the HIway is provided in the updated HIway Fact Sheet for Patients.

- The Mass HIway does not currently function as a clinical data repository that holds electronic medical records for individuals. Patient’s electronic health record(s) are held by specific provider organizations and not the Mass HIway.