

2021 Update to the Health Information Exchange Strategic Plan and 2022 Connectivity Criteria

Staff Review

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- **Review and approve Health Information Technology (HIT) Plan**
now known as the Health Information Exchange Strategic Plan (HIE Plan)
 - 18 V.S.A. § 9375:
 - The Board is charged to review and approve Vermont’s statewide HIT Plan “to ensure that the necessary infrastructure is in place to enable the State to achieve the principles expressed in section 9371 of this title [Principles for Health Care Reform].”
 - 18 V.S.A. § 9351(a):
 - The HIE Plan “shall include the implementation of an integrated electronic health information infrastructure for the sharing of electronic health information among health care facilities, health care professionals, public and private payers, and patients” and “shall include standards and protocols designed to promote patient education, patient privacy, physician best practices, electronic connectivity to health care data, and, overall, a more efficient and less costly means of delivering quality health care in Vermont.”
 - DVHA is required to revise the HIE Plan annually, with a comprehensive update every 5 years; this is the second annual update to the 2018 HIE Plan.

- **Review and approve Connectivity Criteria**
 - Under 18 V.S.A. § 9352(i)(2), Vermont Information Technology Leaders (VITL) must “establish criteria for creating or maintaining connectivity to the State’s health information exchange network” and provide those criteria to the Board by March 1 each year. The Board approved 2020 Connectivity Criteria in November 2019.

Process Reminder



- **November 1:** DVHA submitted HIE Plan to GMCB.
- **November 3 through November 25:** HIE Plan posted for special public comment period.
- **November 17:** DVHA and VITL present HIE Plan and Connectivity Criteria; GMCB staff review.
- **December 1:** Final staff recommendation to GMCB on HIE Plan and Connectivity Criteria; potential Board votes.

Suggested Principles for HIE Plan Review

Four principles for review of the HIE Plan, building on statutory requirements.

1. Is the HIE Plan consistent with the requirements of 18 V.S.A. § 9351?
2. Is the HIE Plan consistent with the Principles for Health Care Reform in 18 V.S.A. § 9371, and will it help achieve the State's health reform goals?
3. Is the HIE Plan consistent with other relevant legislation?
4. Does the HIE Plan incorporate national best practices and expertise as well as feedback from Vermonters, including key HIE constituents (VITL, State of Vermont HIE stakeholders, and other private HIE providers), health care providers, and individuals seeking care?

Assessing the 2021 Update to the HIE Plan



1. Is the HIE Plan consistent with the requirements of V.S.A. 18 § 9351?

V.S.A. 18 § 9351 (b) describes requirements for the Health Information Technology Plan, including supporting “effective, efficient, statewide use of electronic health information” for a variety of purposes; educating providers and the public; supporting interoperability; proposing strategic investments in technology and infrastructure; recommending funding mechanisms; incorporating existing initiatives whenever possible; integrating with the Blueprint for Health and Medicaid information technology systems whenever possible; and addressing issues related to governance and security.

- As submitted, the 2021 update to the HIE Plan meets these criteria. The updated Plan describes the technologies in place in the foundational Phase 1 of the Collaborative Services Project and describes activities underway in Phase 2 of the new platform infrastructure and implementation which replaces the Vermont Clinical Registry and VITL’s own Health Data Management platform. The outcomes anticipated in this implementation are:
 - Better data to support health care and health care system improvement
 - More efficient data access for clinicians through FHIR API support
 - Improved data and access for VHIE stakeholders
 - Support for patient access to data
 - More efficient and sustainable technology platform
 - Strong security and compliance with interoperability rule requirements

Assessing the 2021 Update to the HIE Plan



2. Is the HIE Plan consistent with the 14 Principles for Health Care Reform in 18 V.S.A. § 9371, and will it help achieve the State's health reform goals?

This 2021 update is consistent with the Principles as established in this legislation. The HIE Plan describes the focus for 2022 to include:

- developing governance structures
- improving public health capabilities through data integration
- refining the HIE Conceptual IT Services Model
- leveraging the Unified Health Data Space to support Medicaid
- improving access to health information

Assessing the 2021 Update to the HIE Plan



3. Is the HIE Plan consistent with other relevant legislation?

In 2021, Vermont's law on immunization records, 18 V.S.A. § 1129, was amended to allow immunization record sharing from the Department of Health's Immunization Registry to the Vermont Health Information Exchange.

Vermont's Act 53 of 2019 prompted the change to Vermont's HIE consent policy. In 2021, the HIE Steering Committee and their subcommittees began to contemplate changes to the State's Protocols for Access to Protected Health Information on VHIE to enable aggregation and exchange of additional data sources that constitute an individual's health profile (e.g., substance use disorder data, social determinants of health data, and claims).

In 2022, the Agency of Human Services, in partnership with VITL and the HIE Steering Committee, will articulate how public health operations may be enhanced through integration with the VHIE. This effort will include an analysis of policy and legislative changes that may be required for additional data sharing or data access arrangements between the Department of Health and the VHIE. Additionally, the State and HIE Steering Committee will work to further design consent and data governance processes needed for sharing and accessing claims, social determinants of health (SDoH), and clinically sensitive data.

Assessing the 2021 Update to the HIE Plan



4. Does the HIE Plan incorporate national best practices and expertise as well as feedback from Vermonters, including key HIE constituents (VITL, State of Vermont HIE stakeholders, and other private HIE providers), health care providers, and individuals seeking care?

- National Best Practices and Expertise: The HIE Plan approved in 2018 built on national standards and models for HIE governance and technology/IT services. Since 2018, Vermont, with guidance from the HIE Steering Committee, has taken great strides in both developing and executing IT strategies that improve redundancies and inefficiencies and that align the State with the introduction of new federal rules that drive national interoperability and growth in the HIE marketplace.
- Feedback from Vermonters: The HIE Steering Committee includes stakeholders from a variety of key HIE constituencies. In addition, DVHA staff and HIE Steering Committee members sought input from other HIE stakeholders:
 - *HIE Plan and Technical Roadmap*: The HIE Steering Committee and its subcommittees includes stakeholders representing hospitals, FQHCs, DAs, OneCare, payers, the Blueprint, and VDH (both leadership and VHIE data users).
 - *Integrating new data on the VHIE*: the policies and processes that govern how data in the VHIE is sourced, accessed, and managed are essential to respecting people's privacy and supporting effective care coordination. As such, the HIP Plan incorporates intent to involve stakeholders in the development of data management processes and policies and opportunities for public input will be made available.

Suggested Principles for Connectivity Criteria Review

Two principles for review of Connectivity Criteria, building on statutory requirements.

1. Are the proposed Connectivity Criteria in alignment with HIE Plan goals, and will they support implementation of the HIE Plan and achievement of the State's health reform goals?
2. Are the proposed Connectivity Criteria sufficiently clear to be operationalized by VITL, the State of Vermont, and health care provider organizations?

Assessing 2022 Connectivity Criteria

1. Are the proposed Connectivity Criteria in alignment with HIE Plan goals, and will they support implementation of the HIE Plan and achievement of the State's health reform goals?

- This year's Connectivity Criteria remain aligned with the HIE Plan's goals and structure, and will support increased availability of high-quality, usable data, critical to the achievement of Vermont's health reform goals. In 2021 the HIE Steering Committee expanded the purpose of the Connectivity Criteria Subcommittee to allow for the development of Connectivity Criteria for specific data sets, including defining data elements specific to sensitive care settings, social determinants of health and claims data.

2. Are the proposed Connectivity Criteria sufficiently clear to be operationalized by VITL, the State of Vermont, and health care provider organizations?

- Yes. These criteria were developed to expand providers' ability to submit and receive structured data from the VHIE, in part by providing specific standards and requirements to support Vermont providers in contract negotiations with EHR vendors.

Looking Ahead

- Special public comment period open through **November 25** (see [GMCB Public Comment](#) page)
- Final staff recommendation to the Board on HIE Plan and Connectivity Criteria votes and potential votes on **December 1**