

STATE OF VERMONT  
GREEN MOUNTAIN CARE BOARD

**DECISION AND ORDER APPROVING THE  
2022 UPDATE TO THE HIE PLAN AND 2023 VHIE CONNECTIVITY CRITERIA**

In re: 2022 Update to the Health Information )  
Exchange Strategic Plan and 2023 VHIE )  
Connectivity Criteria )  
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At a public meeting on November 16, 2022, the Agency of Human Services (AHS) presented the 2022 five-year comprehensive update to the Health Information Exchange Strategic Plan (HIE Plan) and Vermont Information Technology Leaders (VITL) presented the 2023 VHIE Connectivity Criteria to the Green Mountain Care Board (GMCB or Board). Vermont law requires the HIE Plan be revised annually and comprehensively updated every 5 years. 18 V.S.A. § 9351(a)(1). The GMCB must review and approve the HIE Plan annually “to ensure that the necessary infrastructure is in place to enable the State to achieve the principles expressed in section 9371 of [Title 18].” 18 V.S.A. § 9375(b)(2)(A). In addition, 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. 18 V.S.A. § 9352(i)(2). The Board has reviewed Connectivity Criteria for the coming year in conjunction with its annual review of the HIE Plan since 2018.

Following Board discussion on November 16, 2022, the Board provided a memo to AHS that included significant and numerous requests for modifications to the submitted HIE Plan that the Board discussed in its meeting, including changes related to privacy protections, policy and funding strategies, technology expansion, data governance considerations, and other areas. AHS addressed the Board’s requested changes and resubmitted a revised HIE Plan on December 9, 2022. See Health Information Exchange Strategic Plan 2023-2027 Plan (2022 Update) (December 9, 2022).<sup>1</sup>

At a public meeting on December 14, 2022, Board staff recommended that the Board approve the resubmitted HIE Plan as having met the following review criteria: consistency with the requirements of 18 V.S.A. § 9351; consistency with the Principles for Health Care Reform in 18 V.S.A. § 9371; consistency with other relevant legislation; incorporation of national best practices and expertise as well as feedback from Vermonters; the degree to which privacy concerns and privacy protections addressed; whether the Plan addresses capacity needs as the strategic vision expands; feasibility and achievability of proposed strategies; and alignment with legal and technical constraints and considerations. Board staff also recommended that the Board approve the 2023 Connectivity Criteria as having met the following review criteria: alignment with HIE Plan goals; supporting implementation of the HIE Plan and achievement of the State’s health reform goals; and that the proposed Connectivity Criteria are sufficiently clear to be operationalized by VITL, the State of Vermont, and health care provider organizations.

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<sup>1</sup> Available at:

[https://gmcboard.vermont.gov/sites/gmcb/files/documents/HIEPlanUpdate\\_2022\\_Final\\_Submitted12.09.2022\\_0.pdf](https://gmcboard.vermont.gov/sites/gmcb/files/documents/HIEPlanUpdate_2022_Final_Submitted12.09.2022_0.pdf)

Following discussion and opportunity for public comment, the Board unanimously voted to approve the 2022 Comprehensive Five-Year Update to the HIE Plan and the 2023 VHIE Connectivity Criteria, as described in the revised and resubmitted HIE Strategic Plan, with no conditions.

**SO ORDERED.**

Dated: 1/4/2023 at Montpelier, Vermont

s/ Owen Foster, Chair )  
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s/ Jessica Holmes )  
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s/ Robin Lunge )  
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s/ David Murman )  
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s/ Thom Walsh )

GREEN MOUNTAIN  
CARE BOARD OF  
VERMONT

Filed: 1/4/2023

Attest: s/ Jean Stetter  
Green Mountain Care Board  
Administrative Services Director

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