

OREGON HEALTH INFORMATION EXCHANGE STRATEGIC AND OPERATIONAL PLAN

EARLY DRAFT

EXECUTIVE SUMMARY

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HEALTH INFORMATION EXCHANGE AND THE HEALTH OF OREGONIANS

Health information exchange (HIE) is a key building block for health care system improvement. The inconsistent and fragmented nature of patient records is a highly visible example of the well-publicized flaws of the U.S. health care system's reliance on multiple, disparate players including physicians, hospitals, laboratories, imaging centers, insurers, employers and myriad others. Sharing patient information in a secure, efficient manner has the potential to substantially reduce costs, waste and consumer heartache. It will support efforts to track patients' medical outcomes to improve the quality and safety of care. And it can empower consumers to better understand their own health and choose high-quality providers.

OREGON HEALTH REFORM, HIT AND HIE

Oregon has long been in the forefront of innovation in health care delivery, access and technology, dating back to its groundbreaking Medicaid waiver design with the Oregon Health Plan in 1987 and continuing to 2009, when the state legislature approved an ambitious health reform law (HB 2009). Oregon's new law anticipated many of the innovations contained in the federal recovery law (American Reinvestment and Recovery Act) that same year and in national health reform (Patient Protection and Affordable Care Act) a year later. The central role of health information technology (HIT) in improving access, quality and value in the health care system has been a thread running through Oregon's health reform, with one tangible result being the creation of the Health Information Technology Oversight Council (HITOC) to guide these efforts within Oregon.

One of HITOC's early focuses has been the creation of a strategic and operational plan for HIE within Oregon. This opportunity came about after Congress made the acceleration of health information technology an urgent priority in early 2009; it included the HITECH Act as part of its economic recovery legislation (ARRA). Ultimately this resulted in federal grant funding for the nation's states and territories to lead the planning of health information exchange, and the creation of this strategic plan.

The work of organizing electronic health information exchange in Oregon is advanced by the health system planning processes that have already taken place and in particular by the strong participation by average Oregonians along with health industry stakeholders throughout the state. This plan builds on those efforts over the past several years, along with existing health information infrastructure in both the private sector and within government.

Oregon's leadership has established three main goals for healthcare system improvement:

- Improve the lifelong health of all Oregonians;
- Increase the quality, reliability and availability of care for all Oregonians; and
- Lower or contain the cost of care so it is affordable to everyone.

Oregon's approach to statewide health information exchange will include nurturing a new and growing marketplace of local and regional health information organizations (HIOs), setting and monitoring standards to

ensure the security of personal health information, developing an accreditation program to ensure HIO-to-HIO exchange with a common set of rules, providing valued centralized services and filling the gaps in availability to rural providers and other identified stakeholders.

Oregon is using a phased approach to HIE to allow flexibility to adjust over time to new federal rules, marketplace evolution and real-world lessons learned. It will establish a state-designated, nonprofit, public-private entity (SDE) to carry out this work after a sustainable financing plan has been developed and appropriate legislation has been passed.

VISION

The core of this work centers around the Oregon Health Authority's vision of healthy Oregonians and the three key goals: improved patient experience, improved population health, lower per capita costs.

Oregon Health Authority Vision and Mission:

Healthy Oregonians

Helping people and communities achieve optimum physical, mental and social well being through partnerships, prevention and access to quality, affordable health care.

A similar mission statement for health information exchange is being developed by HITOC in June 2010.

Given the complexity of this effort—which includes a rapidly changing regulatory, economic, political and technical environment—the stakeholders, planning team and HITOC have developed a strategy that includes the following key elements:

- A phased approach to planning and implementation
- State government in a role of facilitation, coordination and communication
- Adherence to federal standards and certifications as they evolve and the development of Oregon-specific standards, certifications and accountabilities
- Collaboration and support of HIE efforts underway through local health information organizations

OVERARCHING IMPERATIVES

- Establish a governance structure that achieves broad-based stakeholder collaboration with transparency, buy-in and trust.
- Set goals, objectives and performance measures for the exchange of health information that to accomplish statewide coverage so all providers can meet HIT requirements related to meaningful use criteria.
- Ensure the coordination, integration, alignment and support of efforts with Medicaid, public health programs, the Regional Extension Center, local and regional HIOs and other efforts already underway.
- Establish mechanisms to provide oversight and accountability of HIE to protect the public interest.
- Be flexible to align with emerging nationwide HIE governance and standards.
- Incorporate national and state health reform goals.

GOALS OF HEALTH INFORMATION EXCHANGE

- To ensure patients have safe, secure access to their personal health information and the ability to share that information with others involved in their care.
- To engage in an open, inclusive, and collaborative public process that supports widespread electronic health record (EHR) adoption and robust, sustainable statewide coverage.
- To improve health care outcomes and reduce costs.

- To integrate and synchronize the planning and implementation of HIE and health IT in the public and private sectors, including Medicaid and Medicare provider incentive programs, the Regional Extension Center, local and regional HIOs and other efforts underway.
- To ensure accountability in the expenditure of public funds.
- To improve population health.

Strategies and goals for achieving HIE capacity and use

Phase	Summary
One	<p>Will enhance current and developing regional HIE efforts through:</p> <ul style="list-style-type: none"> Existing public/private governance through HITOC Allowing markets to develop Providing support where needed Developing privacy and security frameworks Establishing workgroups and other forums to facilitate policy and procedural decisions Building a financial sustainability strategy Collaborating with local and regional HIOs, Regional Extension Center, broadband expansion efforts, workforce development initiatives, Medicaid, public health and other efforts underway Establishing an accreditation process with consistent standards for local and regional HIOs to receive and deliver HIE to others across organizational and jurisdictional boundaries
Two	<p>Nonprofit state-designated entity (SDE) for governance is established to:</p> <ul style="list-style-type: none"> Develop and support efforts to cover gaps Establish small-scale operations as needed to support centralized HIE services including a Master HIE Participant Directory, Trust Services for HIE Participants, and Certification and Accreditation Program Establish central contracting agency Adopt enhancements as needed for privacy and security standards and policies Provide technology and technology support services as needed
Ongoing	<ul style="list-style-type: none"> Evaluation of Phase Two Non-profit, services and technical effort refined as needed All efforts refined as needed based on performance, utilization, and stakeholder feedback. Analysis of functional and geographic gaps in HIE services and coverage may lead to defining additional services to be offered by the SDE

HIGHLIGHTS OF STRATEGIC PLAN DETAILS

Environmental Assessment

- Oregon has several large health systems that are actively pursuing health information exchange.
- 65% of Oregon physicians work in practices with EHRs, well ahead of the national average.
- There are a growing number of local HIOs within the state whose work needs to be supported.

- The need for interstate sharing of electronic health information is supported by the fact that Oregon's health care markets already extend across state borders through large hospital systems, health plans and data sharing agreements.

Governance

- HITOC, reporting to the Oregon Health Authority, is the body that provides oversight for health information technology issues and will continue to manage this work going forward.
- Oregon's HIE approach will be conducted in phases to allow for careful planning, input and strategic adjustment as elements of the plan are carried out.
- HITOC will serve as the state-designated entity for HIE during the first phase.
- The statewide infrastructure for carrying out the goals of HIE in Oregon will be as minimal as possible and will leverage existing resources within the state.
- Oregon will establish a public/private, non-profit entity to take on statewide HIE governance and operational duties during the second phase.

Finance

- Recent state and federal health reform efforts have created imperatives and some short-term financing sources to accelerate the adoption of EHRs and health information exchange among health care organizations and providers.
- Priorities in designing ways to pay for exchange include maximizing meaningful use for providers, being equitable among stakeholders in costs and benefits, utilizing user fees and ensuring those fees have broad benefit.
- State contracts can be modified to provide incentives for providers and payers to participate in exchange.
- Specific financing sources for HIE could include Office of the National Coordinator for Health Information Technology (ONC) Cooperative Agreement funds, Medicaid 90/10 money, stakeholder contributions and revenue from services.

Technical Infrastructure/Business and Operations

- The first phase of operations will have HITOC, as the state designated entity, establish standards and requirements for statewide HIE.
- During the second phase a new entity will be designated to implement and operate centralized services for exchange.
- The ongoing business will involve the identification of new services and ensuring that all centralized services are reaching unserved and underserved areas.
- This work will take place in concert with Oregon's neighbors: Washington, Idaho, Nevada and California.
- It will coordinate with administrative simplification efforts already under way.
- It will address the seven priority services identified by ONC.
- HIE standards and certification will be based on U.S. Department of Health and Human Services adopted and nationally recognized technical standards, criteria and frameworks.
- The Oregon HIE effort will align with the National Health Information Network (NHIN) and NHIN Direct, by adopting technology standards and business processes that are interoperable with NHIN and NHIN Direct processes and frameworks.

Legal and Policy

- A privacy and security workgroup will convene in Phase 1 of operations to examine state laws that define specially protected health information.
- An opt-out with exceptions consent model for the use and disclosure of protected health information will, support broad exchange of information for quality, safety and efficiency, while excluding specially

protected health information from HIE unless and until a patient chooses to include it. This policy will maintain current legal status quo for exchanging health information through non-electronic formats.

- This strategy addresses all eight of HHS' principles in its Privacy and Security Framework.
- Oregon's HIOs will be held to national standards, federal and state law.
- HITOC may act as an accrediting body for local HIOs, though this will be studied during Phase 1.

HIT Adoption Strategies

- Oregon's Regional Extension Center's work to support providers' adoption of electronic health records and achievement of meaningful use will be an important adjunct to HIE.
- Work is also under way to bring broadband capabilities to more providers and particularly to those in rural and other underserved areas.
- Efforts for HIE through local, regional and statewide entities will support EHR connectivity to data sharing, beginning with three priority services: electronic prescription transmission, summaries of care and laboratory test orders and results.

Coordination

- The Oregon Medicaid program's comprehensive planning work to develop a State Medicaid HIT Plan (SMHP) will be a natural coordination point with the statewide HIE effort.
- A wide variety of other state and federal programs touch on electronic health information exchange and will be part of a coordinated plan.
- HITOC and eventually the state designated entity will work with Oregon HIT workforce development programs.
- Oregon's health care markets extend across state borders so continued coordination with neighboring states will be a priority of this strategic plan.

Role of Consumers

- Security and privacy are important to Oregon consumers.
- The strategy takes into account the development of personal health records.