

Use Case Governance

Version	Approval Date	Owner
1.0	November 23, 2015	Pam Clarke

1. Purpose

The purpose of HealthShare Exchange of Southeastern Pennsylvania, Inc. (HSX) Use Case Governance policy is to provide a framework for HSX Use Case development and approval.

2. Scope

This policy applies to HSX Use Cases that are presented to HSX for consideration that are non-exceptional Use Cases. All Treatment and non-Treatment Use Cases that are for Permitted Purposes in accordance with the HSX Founding Member Participation Agreement (“PAR”) shall be reviewed in accordance with this policy by the applicable HSX standing committees, workgroups and the HSX Board of Trustees (the “Board”). When a Use Case is deemed to be for Treatment, all applicable HSX Participants shall contribute and disclose Data to support the Use Case.

3. Policy

All future HSX Use Cases:

- Must be aligned with the approved HSX business plan
- Must be able to be funded in accordance with HSX sustainability plans
- Must be for Permitted Purposes in accordance with the PAR
- May respond to a local or regional need
- Should demonstrate a Return on Investment (“ROI”) for HSX Participants if additional resources are required for implementation
- Must be approved by applicable HSX standing committees/workgroup

- Future HSX Use Cases requires Board approval only when:
 - The new Use Case is for Non-Treatment purposes
 - The new Use Case could result in implementation costs that would exceed HSX budgetary allowance and/or increased implementation or other costs for Participants.

- The new Use Case proposed services is not contemplated in the approved HSX business plan
- HSX will consider Use Case suggestions that come from staff, the Board, members, participants, governmental agencies and healthcare professionals.
- Once approved and implemented, a Use Case will be monitored and evaluated for quality, usage, and effectiveness.
- HSX will maintain a record of all proposed Use Cases, regardless of whether or not they are approved.
- Non-approved Uses Cases that utilize Direct Secure Messaging may be implemented by participants where process, infrastructure, and or financial investment by HSX are NOT required.

HSX Participants would be permitted the opportunity to appeal a denial of a proposed new Use Case.

4. Procedures

The following describes the steps that outline HSX Use Case governance process flow:

1. HSX receives a new Use Case proposal and it is reviewed as illustrated by the Process Flow, Figure 1.
2. HSX staff reviews the proposed new Use Case. If needed, HSX staff will conduct outreach and research with constituents and/or the HIE community at large to ensure that the proposed Use Case description is clear and to assess whether or not such a Use Case has been implemented in another HIE community.
3. If HSX staff believes that the proposed Use Case has merit, the Clinical Advisory Committee chair reviews the Use Case proposal.
4. Based upon Clinical Advisory Committee chair's comments, HSX staff refines the Use Case in preparation for committee reviews and then provides the proposed Use Case to the Clinical Advisory Committee, Privacy and Security Workgroup, and Technical Standards Committee for consideration in accordance with the Use Case review evaluation criteria, Figure 2. Each Use Case is designated as either Treatment or Non-Treatment through the committee/workgroup review process.
5. If there are financial implications to HSX or Participants, the proposed Use Case is reviewed by the Finance and Audit Committee.
6. Ongoing follow up with stakeholders who proposed the Use Case occurs as additional clarification and justification are needed.
7. HSX staff refines the Use Case based on committee and workgroup input.
8. In order for a Use Case to be approved, an affirmative vote of two-thirds (2/3) of the members of each applicable committee and workgroup is required.

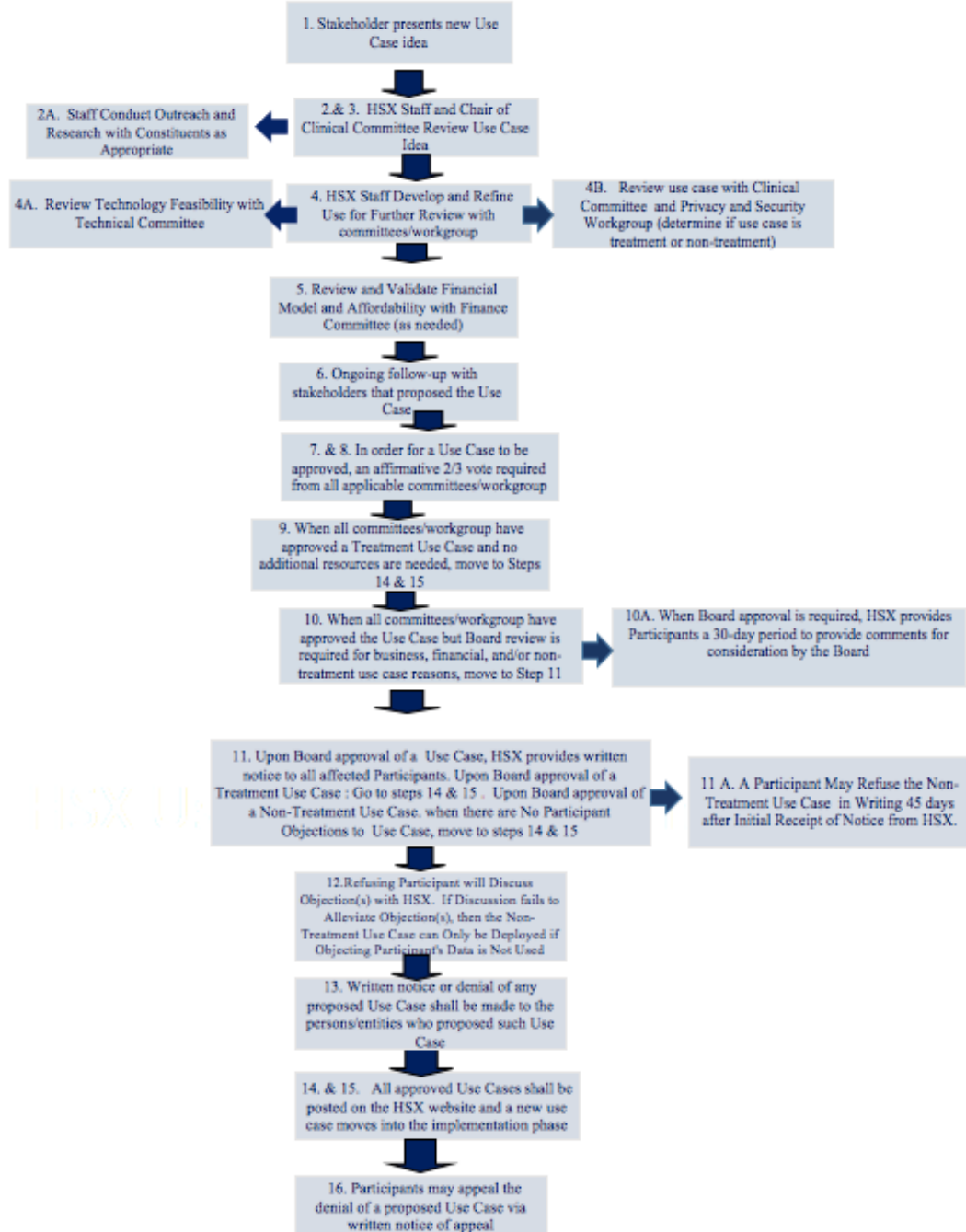
9. After the Use Case has been vetted and approved by all the necessary committees/workgroup and does not require Board approval, the Use Case is disseminated to all HSX Participants and posted on the HSX website.
10. For non-Treatment Use Cases that require Board approval, the Use Case as approved by the applicable committees/workgroup shall be presented to the HSX Board for final approval. Prior to presenting the Use Case to the Board, Participants are given a thirty (30) day period to provide final comments on the proposed Use Case in writing to a member of the HSX Management Team(email acceptable).
11. Upon Board approval of a Non-Treatment Use Case, HSX shall provide written notice to all Participants who are of the Participant type described in any non-Treatment Use Case of the approval of such non-Treatment Use Case. Within forty-five (45) days after the receipt of notice from HSX containing the proposed non-Treatment Use Case in sufficient detail so that Participant can make an informed decision as to its participation, Participant may refuse to participate in such non-Treatment Use Case by the provision of written notice to HSX (email acceptable).
12. In the event that a Participant provides written notice of its refusal to participate in such non-Treatment Use Case, the objecting Participant shall meet with HSX and its designees as requested to discuss its objections and any modification to such non-Treatment Use Case that, if made, would resolve the Participant's objections. If such meeting fails to resolve Participant's objections, HSX may deploy such non-Treatment Use Case only if it is able to utilize a technological means to ensure that the objecting Participant's Data is not disclosed or shared for the non-Treatment Use Case. If such a technological solution does not exist and/or is impracticable or too costly to be utilized, HSX shall not deploy such non-Treatment Use Case until such time as Participant's objections are withdrawn or Participant is no longer a Party to the PAR.
13. Prompt written notice of the denial of any proposed Use Case shall be made to the persons and entities who proposed such Use Case at the applicable stage in the approval process.
14. All approved Use Cases shall be posted on the HSX website.
15. Upon approval, a new Use Case moves into the HSX implementation phase.
16. Participants may appeal the denial of a proposed Use Case by submitting a written notice of appeal setting forth the reasons why such proposed Use Case should be approved and why the denial should be set aside within sixty (60) days of receipt of written notice of the denial. Appeals shall be considered by the HSX Executive Committee.

Figure 1. Process Flow



HealthShare Exchange

1801 Market Street, Suite 750 Philadelphia PA, 19103 www.hsxsepa.org





1801 Market Street, Suite 750 Philadelphia PA, 19103 www.hsxspea.org

Figure 2. Use Case Review Evaluation Criteria

Evaluation Criteria	Reviewers					
	Board of Trustees (If Additional Resources Needed)	Clinical	Privacy and Security Workgroup	Finance	Technology	HSX Staff
Value and ROI for Members and Consumers	✓	✓		✓	✓	✓
Use Case Alignment with established HSX business plan	✓			✓		✓
Healthcare IT Related						✓
Enhances Patient Care		✓	✓			✓
Quality Improvement Initiative		✓				✓
Integrates into Workflow and Processes		✓			✓	✓
Leverages Current Technology					✓	✓
Technically Feasible					✓	✓
Financial Model and Impact	✓			✓		✓
Consumer Protections			✓			✓
Compliance with Privacy and Security Framework			✓			✓

5. Enforcement

The Executive Director has responsibility for oversight of the HSX Use Case Governance process and procedure under the guidance of the Executive Committee and direction of the HSX Board. HSX committee chairs and staff facilitators are responsible for ensuring that Use Cases are properly vetted and approved in accordance with this policy.

6. Definitions

For a complete list of definitions, refer to the *Glossary*.

7. References

Regulatory References:

- None

Policy Owner	Privacy Officer	Contact	Pam.clarke@hsxspea.org
---------------------	-----------------	----------------	--

1801 Market Street, Suite 750 Philadelphia PA, 19103 www.hsxsepa.org

Approved By	HSX Senior Management Team HSX Privacy and Security Workgroup HSX Board	Approval Date	November 23, 2015
Date Policy In Effect	November 23, 2015	Version #	1.0
Original Issue Date	November 23, 2015	Last Review Date	December 22, 2016
Related Documents	Glossary		