

**Health Information Technology Exchange of Connecticut  
Legal and Policy Committee  
August 16, 2011**

**Meeting Minutes**

Present: John Lynch, Lori Reed-Fourquet, Brenda Kelly, Jennifer Groves, Jill Kentfield (DPH), Marianne Horn (DPH).

Discussion took place regarding the draft HITE-CT policies. Further edits were made. Committee members have until September 6, 2011 to comment on the policies. On September 6, 2011 a CT Law Journal notice will be published providing the public with the opportunity to view the policies and to comment on the Department's website or in person at a Legal and Policy meeting. A special Legal and Policy meeting has been scheduled for September 6, 2011 at 8:30 AM at BEST to discuss the final versions before they are posted to the website. The following is a projected timeline for adopting the HITE-CT policies:

- Notice will be given in the CT Law Journal on September 6, 2011
- The public will be able to comment in person at a special Legal and Policy meeting scheduled for September 20, 2011 – 8:30 AM
- The public will have until October 6, 2011 to send in written comments to HITE-CT
- The Legal and Policy Committee will review comments made by the public at a meeting during the week of October 10
- The Legal and Policy Committee will send the final version of the policies to the Board for consideration at their October 17, 2011 Board meeting

Marianne and Jill will put together the language to publish the notice in the CT Law Journal.

The following policies will be available for review and comment by the public:

Proposed policies:

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|----------------------------|--|
| Audit Policy               | <p>The purpose of the policy is to ensure that the security and confidentiality of patient data transmitted through HITE-CT is protected through privacy/security audits.</p> <p>Audit is defined as follows: systematic and independent examination of accesses, additions, or alterations to electronic health records to determine whether the activities were conducted, and the data were collected, used, retained or disclosed according to organizational standard operating procedures, policies, good clinical practice, and applicable regulatory requirement(s).</p> |
| Identity Management Policy | <p>The purpose of the policy is to ensure that the identities of the persons and entities interacting with HITE-CT are assured through the performance of tests to enable a data processing system to recognize entities (individuals or machines interacting with the HITE-CT system).</p>  |

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| Authentication Policy                     | The purpose of the policy is to ensure that systems and persons interacting with HITE-CT system are known through the process of reliable security identification of subjects by incorporating an identifier and its authenticator.   |
| Access Control Policy                     | The purpose of the policy is to define who and how individuals and systems can access HITE-CT managed data through a means of ensuring that the resources of a data processing system can be accessed only by authorized entities (individuals or machines interacting with the HITE-CT system) in authorized ways.   |
| Consumer Authorization and Consent Policy | The purpose of the policy is to define the circumstances in which a consumer can permit or withhold disclosure of HITE-CT accessible health information.  |
| Consumer Principles Policy                | The purpose of the policy is to define consumers' and patients' expectations that will govern the design and implementation of health information exchange and technology in Connecticut.   |
| Breach Notification Policy                | The purpose of the policy is to define policy surrounding identification, investigation, notification, and mitigation of a breach. Breach is defined as a Reportable Event involving the unauthorized acquisition, access, use or disclosure of protected health information on the Connecticut Health Information Exchange which compromises the security or privacy of protected health information maintained by or on behalf of a person. Such term does not include a Reportable Event where an unauthorized person to whom such information is disclosed would not have reasonably been able to retain such information. An example of a Reportable Event is a clinician sharing his/her user name and password with another clinician in the practice who had forgotten his/her own user name or password. |
| Purpose of Use Policy                     | The purpose of the policy is to define permissible uses of the HITE-CT information such as Patient Care, Public Health, and Quality.  |
| Information security                      | The purpose of the policy is to ensure that the information security is conducted in a manner that protects personal health information and that supports the availability, confidentiality, integrity, and accountability of HITE-CT shared clinical information.  |
| Affinity Domain Policy                    | This document describes the statewide standard interoperability requirements and specifications including standard content, identification schemes, vocabularies, systems and their interactions to be supported by the Connecticut Health Information Exchange (HITE-CT).  |

Next meeting: September 6, 2011 8:30 AM – 10:00 AM will take place at BEST (formerly DOIT) and also use GoToMeeting.

The meeting adjourned at 10:05 am.