

Resolution Number 2014-09
Resolution Recommending a Data Repository
for the Illinois Health Information Exchange Authority

WHEREAS, on July 7, 2014, the Strategic Planning Exploratory Work Group (“Work Group”) of the Illinois Health Information Exchange Authority (“ILHIE Authority”) Board voted to recommend to the Board that the Board move forward with plans to create a voluntary data repository, and said recommendation is attached hereto as Exhibit A and incorporated herein (“Recommendation”);

WHEREAS, the Board has reviewed and endorses the Recommendation, and wishes to move forward on the plan to create a voluntary data repository.

BE IT RESOLVED BY THE ILLINOIS HEALTH INFORMATION EXCHANGE AUTHORITY, AS FOLLOWS:

Section 1. Authority. This resolution is adopted pursuant to Section 15(e) of the Illinois Health Information Exchange and Technology Act, 20 Illinois Compiled Statutes 3860/1 et seq.

Section 2. Creation of a Data Repository.

RESOLVED, the ILHIE Authority Board hereby adopts the Recommendation of the Work Group and authorizes the ILHIE Authority to move forward on the plan to create a voluntary data repository; and

RESOLVED, the Board hereby directs Raul Recarey, as Executive Director of the ILHIE Authority, to take any and all necessary steps to move forward with plans to create a voluntary data repository and to otherwise implement the Recommendation.

Section 3. Enactment. This resolution shall take effect immediately. If any section, paragraph or provision of this resolution shall be held to be invalid or unenforceable for any reason, the invalidity or unenforceability of such section, paragraph or provision shall not affect any of the remaining provisions of this resolution.

Adopted this 23rd day of July, 2014 by a majority vote of the appointed members as follows:

Ayes: 7
Nays: 0
Abstain: 0
Absent: 2

Kerri McBride
Secretary

Exhibit A



To: Illinois Health Information Exchange Authority Board

From: Illinois Health Information Exchange Authority Board Strategic Plan Exploratory Work Group

Date: July 7, 2014

RE: Recommendation for Implementation of Data Repository Service

Background

At the request of the ILHIE Authority Board, an exploratory committee was formed to review the service recommendations made at the ILHIE Authority Strategic Planning meeting which took place on March 17, 2014, more specifically to review the request and need for a data repository. The work group members were Dr. Nancy Newby, Dr. Bruce Wellman, Roger Holloway, Dr. Nick Panomitros and David Carvalho. Other members of the Board were also invited to attend if they were available.

Need for Data Repository

The ILHIE Authority has estimated that approximately 70% of the providers in Illinois that wish to connect to the ILHIE do not have EMRs capable of producing an on demand continuity of care document (CCD or C32). As a result it is impossible for these providers to participate in bi-directional exchange through ILHIE Connect as it is currently configured. A number of these providers can produce a continuity of care document on a scheduled basis, but these providers do not have a place to store the documents so that the documents can be provided in response to a query from the ILHIE. The ILHIE Authority can resolve this problem by establishing a data repository to store continuity of care documents so that the documents can be queried by the ILHIE as part of a bi-directional exchange.

The proposed data repository would be voluntary. The servers on which the data repository would be located will be provided by InterSystems, the ILHIE Authority's HIE vendor. Each participant choosing to use the repository would have its data segregated from the data of other participants using the repository. Data in the repository would be accessible and available only to the same extent that data is accessible and available from participants who are able to produce continuity of care documents on demand, in accordance with the permitted purposes allowed under the ILHIE Authority policies and procedures and applicable law. The data in the repository would continue to be owned by the participant, but the ILHIE Authority will host the repository. Data in the repository, like data in the MPI, would be encrypted both at rest and in transit.

Work Group meetings

The work group met 3 times (June 9, June 16 and July 7). At the initial meeting, the work group clarified the tasks at hand and determined the additional information it needed to make a decision on the need for a data repository. Those issues that needed to be reviewed were the following:

1. What is the risk?
2. What is the user cost?
3. What is the ILHIE Authority cost?
4. What is the EHR vendor cost?

At the second and third meetings, the work group reviewed the responses to these issues provided by ILHIE Authority staff and voted on its recommendation.

The answers to these questions are as follows:

1. What is the risk?

By establishing a repository, the ILHIE Authority would increase its risk to the extent that it would hold a greater volume of PHI, and that PHI would be more detailed than that in its MPI. Business and government best practice data protection safeguards that the ILHIE Authority already has in place should help to prevent the breach of information and, if there is a breach, the ILHIE Authority will have certain protection through its contracts with InterSystems and the ILHIE participants, as well as under state law, and through the anticipated acquisition of supplemental third-party insurance

2. What is the user cost?

InterSystems estimates that it will cost approximately \$150,000 per connection to connect each participant to its Edge server, despite initial statements that there would be no cost. The maintenance of the data on the repository is at no additional cost.

3. What is the ILHIE Authority cost?

It is expected that there will be no additional cost to the ILHIE Authority. The cost for the data repository is included in the ILHIE Authority subscription fees.

4. What is the EHR vendor cost?

The cost to the EHR vendors to create the connection to the ILIHE is between \$2,000 and \$5,000 for the vendors who have customers interested in connecting to the ILHIE. Those vendors are HMS, Netsmart, NextGen and HMS.

Work Group recommendations

After reviewing the risk and the costs, the Work Group concluded that, in spite of the additional risk and the potentially substantial cost, it would recommend to the ILHIE Authority Board that it authorize the ILHIE Authority to move forward on its plan to create a voluntary data repository for use by any provider that wished to participate in bi-directional exchange through the ILHIE.