



The MARYLAND HEALTH CARE COMMISSION

Health Information Exchange

Final Recommended Policies & Proposed Policies for Development

The list below details final recommended policies of the 2009-2012 HIE Policy Board. Detailed policy language can be found [here](#). A draft prioritized list of proposed policies for development is also detailed below.

Final Recommended Policies:

The below recommended policies were used by MHCC staff in developing draft HIE privacy and security regulations.¹

1. Participating Organization Access
2. User Authorization
3. Consumer Choice
4. User Authentication
5. Sensitive Health Information
6. Suspension and Reinstatement of Access
7. Consumer Access
8. Consumer Outreach, Education & Engagement
9. Audit for Access, Use and Disclosure
10. Primary Data Use and Disclosure
11. Consumer Access to Audit

Recommended Policies to be Evaluated:

The below recommended policies are to be considered in future modification to the HIE regulations

1. Secondary Data Use
2. Emergency Access for Participating Organizations

Proposed Policies for Development

1. Notification of Breach
2. Consumer Verification
3. Direct Messaging & Notification
4. Complaints
5. Public Health Reporting
6. Suspension and Termination of Consumer Access
7. Enforcement
8. Policy Review & Revisions
9. Liability
10. Compulsory and Legal Processes
11. Cyber Security
12. Portable Devices and Removable Media
13. Telemedicine
14. Consumer Portals & Health Record Banks
15. Data Reconciliation

¹ The informal draft HIE privacy and security regulations release on March 15, 2013 are available here: http://mhcc.dhmf.maryland.gov/hit/SiteAssets/Pages/Draft-HIE-Regulations/DraftHIERegulationsPublic_forposting.pdf