



Mass HIway Connection Requirement and Attestation Support

July 2021



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This presentation has been reviewed and approved by the Mass HIway, and the presenters are acting as authorized representatives of the Mass HIway.

The information provided in this presentation is for general information purposes only, and in no way modifies or amends the statutes, regulations, and other official statements of policy and procedure that govern access to and use of the Mass HIway.



Introduction to the Mass Hlway

Mass Hlway Regulations and Connection Requirement

Attestation Requirement

Hlway Adoption and Utilization Support (HAUS) Services



The Massachusetts Health Information Hlway (Mass Hlway) promotes health information exchange by healthcare providers and other Hlway participants through technical infrastructure, technical assistance, and market governance

The Mass Hlway's activities assist the Commonwealth's healthcare community:

- By improving care coordination, quality, patient satisfaction, and public health reporting while containing costs

EOHHS contracts with two primary vendors to operate and maintain Hlway

Direct Messaging:

- Orion Health provides [Direct Messaging implementation](#) and [technical support services](#)
- MeHI, the Massachusetts eHealth Institute, supports providers with
 - [Account management](#), [consulting services](#), and [outreach and education](#)

Goals of the Mass Hlway

- To increase the adoption and effective use of HIE across the state
- To provide a stable, secure, and cost-effective Direct Messaging platform



Enable health information exchange by Hlway users and other healthcare providers regardless of affiliation, location, or differences in technology

Hiway Direct Messaging

- Secure method of sending transmissions from one Hlway user to another
- Hlway connection for Massachusetts Public Health Reporting
- *Hlway does not use, analyze, or share information in the transmissions and does not currently function as a clinical data repository*

Hiway Adoption and Utilization Support (HAUS) Services

- Assistance for eligible organizations in the deployment of HIE to enhance care coordination
- On-site/remote training and support for staff to use Mass Hlway and update associated workflows

Hiway Provider Directory 2.0

- Provider Directory listing in-state providers connected to HIE
- Contains information for 25,000+ Hlway Users

Statewide ENS Framework

- Interoperable network of Certified ENS Vendors that enables Event Notification Services (ENS) across Massachusetts



Introduction to the Mass HIway

Mass HIway Regulations and Connection Requirement

Attestation Requirement

HIway Adoption and Utilization Support (HAUS) Services



HIway Regulatory Goals:

- Implement statutory requirement for providers to connect to Mass HIway, which is referred to as the *HIway Connection Requirement*
- Establish requirements for organizations that use the Mass HIway
- Establish mechanism to allow patients to opt in and opt out of Mass HIway

Initial regulations went into effect on February 10, 2017

- Requires that information be transmitted via HIway Direct Messaging in compliance with applicable federal and state privacy laws and implementing regulations

Supporting documentation available on Mass HIway website

[Mass HIway Regulations Summary](#)

[Mass HIway Regulations FAQs](#)

[Mass HIway Policies & Procedures \(version 4\)](#)

[Mass HIway Fact Sheet for Patients](#)

[Mass HIway Education Webinars](#)



Define important requirements for the use of Hlway Direct Messaging

Aligns Hlway Direct Messaging with other modes of transmission like fax or phone

- In compliance with applicable federal and state privacy laws and regulations
- For example, HIPAA, 42 CFR Part 2, M.G.L. Chapter 93H
1-page [Mass Hlway](#)

Hlway users have option to implement a local opt-in and opt-out process

- This option applies to the organization's use of Hlway Direct Messaging

Hlway users have option to distribute 1-page [Mass Hlway Fact Sheet for Patients](#)

- If this option is applied, the fact sheet released in March 2017 should be distributed



HIway Connection Requirement requires providers to connect to the Mass HIway

as set forth in M.G.L. Chapter 118I, Section 7, and as detailed in the Mass HIway Regulations (101 CMR 20.00)

Performance year by provider organization

	2017	2018	2019	2020	2021	2022
Acute Care Hospitals	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Large & Medium Medical Ambulatory Practices		Year 1	Year 2	Year 3	Year 4	Year 5
Large Community Health Centers		Year 1	Year 2	Year 3	Year 4	Year 5
Small Community Health Centers			Year 1	Year 2	Year 3	Year 4



Section 20.06 of the Mass HIway Regulations provides the definitions of the Provider Organizations that have HIway connection dates specified in the regulations

Acute Care Hospital (ACH):

Hospitals licensed under M.G.L. c111 s.51, and the teaching hospital of UMass Medical School

- For a list of *Health Care Facilities Licensed or Certified by the Department of Public Health (DPH)*,* click [here](#)

Medical Ambulatory Practice:

Organization that includes licensed providers who provide primary or specialty outpatient health care

- *Large Medical Ambulatory Practice:* more than 50 licensed providers
- *Medium Medical Ambulatory Practice:* 10 to 50 licensed providers

Community Health Center (CHC):

Federally Qualified Health Center (FQHC) or a FQHC look-alike (as defined by HRSA), or an organization that files cost reports as a CHC, as requested by the Health Policy Commission

- *Large CHC:* 10 or more licensed providers
- *Small CHC:* less than 10 licensed providers

* This list is referred to as the *Massachusetts Licensed or Certified Health Care Facility/Agency Listing* in Section 20.06 of the regulations.



How to determine organization size?



Mass Hlway Regulations Section 20.06 provides detailed definitions

Licensed Providers are limited to include

- Medical doctors, doctors of osteopathy, nurse practitioners, and physician assistants

Licensed Providers are defined as providers who provide services to patients, on behalf of the Provider Organization, regardless of employment status

The Number of Licensed Providers is the number of providers who provided services in June of the first year the organization is required to connect to the Mass Hlway*

* The Mass Hlway team used 2018 data provided by the Health Policy Commission through their Massachusetts Registry of Provider Organizations Program (MA-RPO) to determine which organizations need to attest. The MA-RPO contains information about the number of medical doctors (MDs) and doctors of osteopathy (DOs) that are practicing within the provider organization included in the dataset, but does not contain information about the number of nurse practitioners (NPs) or physician assistants (PAs). Because the Mass Hlway Regulations consider RNs and PAs licensed providers and most ambulatory practices have Nurse Practitioners and/or Physician Assistants on staff, the Hlway team identified the provider organizations within the MA-RPO dataset that had 8 or more MDs and/or DOs to accommodate for the lack of NPs and PAs being included in the dataset. This was done to ensure that any provider organization that included 10 or more licensed providers was accounted for, so they could be notified that they are required to meet the connection requirement.



Provider Organizations must document use cases that employ HIway Direct Messaging to meet the requirement to implement “interoperable EHR systems”

The HIway Connection Requirement is phased in over 4 years

1. The connection requirement gets progressively stricter each year
2. Organizations that don’t meet the requirement may be subject to penalties starting in Year 4
3. The 4-year phase-in period is based on when the Provider Organizations must be connected

Organization Type	Year 1	Year 4
Acute Care Hospitals	2017	2020
Large and Medium Medical Ambulatory Practices	2018	2021
Large Community Health Centers	2018	2021
Small Community Health Centers	2019	2022

Provider types not yet specified in the regulations are anticipated to be required to connect at a future date. Guidance to the affected providers will be provided with at least one year notice.



The 4-year phase-in approach progressively encourages providers to use the Mass HIway for Provider-to-Provider communications via bi-directional exchange of health information

Progressive HIway Connection Requirements

Year 1 Send or receive HIway Direct Messages for at least one use case
o Can be from **any use case category** listed below

Year 2 Send or receive HIway Direct Messages for at least one use case
o Must be a **Provider-to-Provider Communications** use case

Year 3 **Send** HIway Direct Messages for at least one use case, **and Receive** HIway Direct Messages for at least one use case
o Both must be **Provider-to-Provider Communications** use cases

Year 4 Meet Year 3 requirement, **or** may be subject to penalties if requirement is not met

2021

Additional ADT Requirement for Acute Care Hospitals Only to use a Certified ENS Vendor

Send Admission, Discharge, and Transfer notifications (**ADTs**)



EOHHS extended the deadline for Acute Care Hospitals to submit ADTs to a Certified ENS Vendor, and the date for potential penalties for noncompliance.

Extended deadlines

See EOHHS [Administrative Bulletin 20-83](#) for details

- The date for required ADT submission under 101 CMR 20.08(4)(b) was extended to **April 1, 2021**
- The new date for Acute Care Hospitals becoming subject to penalties under 101 CMR 20.08(4)(d) for ADT submission non-compliance has been extended to **October 1, 2021**

EOHHS issued this extension so Acute Care Hospitals and ENS Vendors would have additional time to resolve contractual and technical matters.

EOHHS has published the list of Certified ENS Vendors on the [Mass HIway website](#).



What are acceptable Use Cases?



Use Case Categories		Example Use Cases
Provider-to-Provider Communications - Allowed in Year 1 - Required in Years 2 to 4		<ul style="list-style-type: none"> • Hospital sends a discharge summary to a Skilled Nursing Facility (SNF) or Long Term/Post Acute Care (LTPAC) facility • Primary Care Provider (PCP) sends a referral notice to a specialist • Specialist sends consult notes and updated medications list to patient's PCP • Hospital ED requests a patient's medical record from a PCP • PCP sends a CCD or C-CDA with problems, allergies, medications, and immunizations (PAMI) to a Hospital caring for their patient • Community Partner sends a care plan to a PCP for review and approval
Payer Case Management - Allowed in Year 1		<ul style="list-style-type: none"> • ACO/Provider sends quality metrics or claims to a payer • Provider sends lab results to a payer
Quality Reporting - Allowed in Year 1		<ul style="list-style-type: none"> • Provider sends clinical data to Business Associate for quality metrics analysis • Provider sends quality metrics to Business Associate for report preparation
Public Health Reporting - Allowed in Year 1	to DPH	<ul style="list-style-type: none"> • Massachusetts Immunization Information System (MIIS) • Syndromic Surveillance (SS) • Opioid Treatment Program (OTP) • Childhood Lead Paint Poison Prevention Program (CLPPP)
	to other agencies	<ul style="list-style-type: none"> • Occupational Lead Poisoning Registry (Adult Lead) • Children's Behavioral Health Initiative (CBHI)

Not Allowed in 2021



Introduction to the Mass HIway

Mass HIway Regulations and Connection Requirement

Attestation Requirement

HIway Adoption and Utilization Support (HAUS) Services



Annual online Attestation Requirement



In 2021, provider organizations must submit an online Attestation Form between August 1 and October 31*

The Year 3 through Year 5 Attestation Forms collect two key areas of information

1. How the organization met the Hlway Connection Requirement

Questions include:

- Provider-to-provider use case description
- Approximate number of Hlway Direct Messages per month for the use case

2. Whether the organization has an EHR, and if so, how it connects to the Hlway

Questions include:

- Name and version of the EHR?
- Is the EHR an ONC Certified Health IT Product?
- How is the organization connecting to the Hlway?

Options include: (1) EHR directly to Hlway, (2) EHR via a HISP, or (3) via Mass Hlway webmail, (4) via a DirectTrust-accredited HISP other than the Mass Hlway

The Year 5 Attestation Form will also collect information from Acute Care Hospitals to determine whether they are submitting ADTs to a Certified ENS Vendor

*Organizations that don't meet their connection requirement must complete an Exception Form explaining why they were unable to meet the requirement.



In 2021, provider organizations must submit an online Attestation Form between August 1 and October 31*

Additional information collected

3. Provider Organization's Direct Address domain(s)

Use cases cited on the organization's attestation form fulfill the connection requirement when:

- The organization is using a Hlway Direct address, or
- The other party listed in the organization's use case is using a Hlway Direct address, or
- Both parties listed in the organization's use case are using DirectTrust-accredited HISPs to send/receive messages (New for attestation year 2021)

Examples include:

- Surescripts
- athenahealth
- eClinicalDirect
- Cerner

A list of HISPs that have achieved DirectTrust accreditation can be found [here](#) (under "Directory Aggregation Participants")

*Organizations that don't meet their connection requirement must complete an Exception Form explaining why they were unable to meet the requirement.



Attestation: When, Where, and How

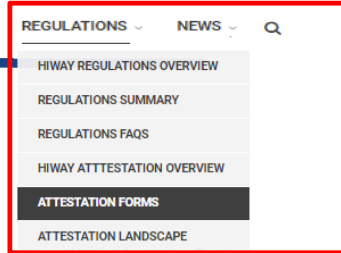


The Attestation Forms are available on the Mass HIway website: masshiway.net

1. To access the forms, go to the **“Regulations”** drop-down menu and select **“Attestation Forms”**
2. Download the PDF version to prepare your answers
3. When ready to submit, click on the link to **access the online version**



ABOUT SERVICES RESOURCES ENROLL



1

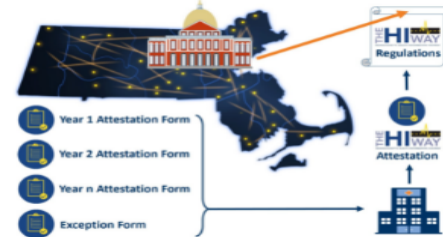
HIWAY ATTESTATION FORMS

Provider Organizations subject to the HIway Connection Requirement must submit annual documentation attesting to their efforts to implement health information exchange use cases.

Starting in 2021, Acute Care Hospitals will also need to submit information regarding participation in the Statewide ENS Framework.

Provider Organizations must submit via online Attestation and Exception Webforms. The HIway provides PDF versions of the forms to enable providers in preparing responses for completing the online attestation, but the HIway will not accept digital/scanned PDF submissions.

For more information, please review the Mass HIway Regulations Summary and FAQs.



2021 DEADLINE

The attestation process is currently closed. The deadline for submitting attestations regarding your 2020 use cases and ENS participation is October 31, 2021.

PDF PREPARATION FORMS

2



PDF versions of the 2021 Attestation and Exception forms will be made available on this page, and by email, in the spring of 2021. Sign up for the HIway newsletter to receive announcements that the PDF versions are available.

ONLINE ATTESTATION AND EXCEPTION WEBFORMS

3



The online Attestation and Exception Webforms will be launched this summer and access will become available here. The launch will be announced via the HIway newsletter. Sign up to the newsletter [here](#).



Section 3 – How organizations fulfill the Connection Requirement

Question 3.8

What must an organization do if it does not meet its 2021 Hlway Connection Requirement?

HIE Requirement Exception Form
Mass Hlway Connection Requirement

2019 Form; Updated January 2019



Purpose: This Form shall be completed by Provider Organizations that cannot meet the Hlway connection requirement, which is the statutory requirement that Provider Organizations connect to the Mass Hlway in accordance with the [Mass Hlway Regulations \(101 CMR 20.00\)](#).

If your Provider Organization cannot meet the Hlway Connection Requirement, an authorized individual at your Provider Organization should submit this form before July 31, 2019 (an authorized individual is an individual who is authorized by the Provider Organization to act on its behalf on this matter).

Provider Organizations should contact the Mass Hlway at MassHlwayAttestation@state.ma.us if they have questions regarding this form or the Connection Requirement.

Please note: your Provider Organization is still expected to meet its Connection Requirement next year.

* The Mass Hlway may contact the organization to discuss that organization’s plans to comply with its 2021 Hlway connection requirement.

If an organization did not meet its Year 3 Hlway connection requirement in 2021, it is still expected to meet the Year 4 requirement in 2022 and submit a Year 4 Hlway Attestation Form by Summer 2022. If an organization did not meet its Year 4 requirement in 2021, the organization is expected to meet its Year 4 requirement in 2022 and submit a Year 5 attestation form by Summer 2022.

As required by M.G.L. c. 118I, Section 8, the Mass Hlway Regulations (101 CMR 20.13- 20.16) establish penalties for not meeting the Hlway connection requirement. These penalties may begin in Year 4 of a Provider Organization’s Hlway connection requirement.



Next Steps



Submit Attestation Form through the Mass HIway website between August 1 and October 31*

Mass HIway will send a confirmation email

Contact the HIway with questions and comments

- To ask questions about the connection requirement or attestation process, email MassHIway@state.ma.us with subject line *"Connection Requirement/Attestation"*
- Confirmation of your attestation and other communications related to the attestation process will come from MassHIwayAttestation@state.ma.us
(Note: white list this address so the message does not go to your spam folder)

* Organizations that don't meet their connection requirement must complete an Exception Form explaining why they were unable to meet the requirement.



Introduction to the Mass HIway

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Attestation Requirement

HIway Adoption and Utilization Support (HAUS) Services



Mass HIway offers HAUS Services to assist organizations in the deployment of electronic health information exchange to enhance care coordination

HAUS Account Management Team will assist organizations with

- Technical Connectivity Assessment
- New or improved utilization of HIE in care coordination, through the development and implementation of HIE-supported use cases
- HIE Technology and Workflow Project Plan
- Training on how to use Direct Messaging services and workflow implementation

Three tracks available to receive HAUS Services

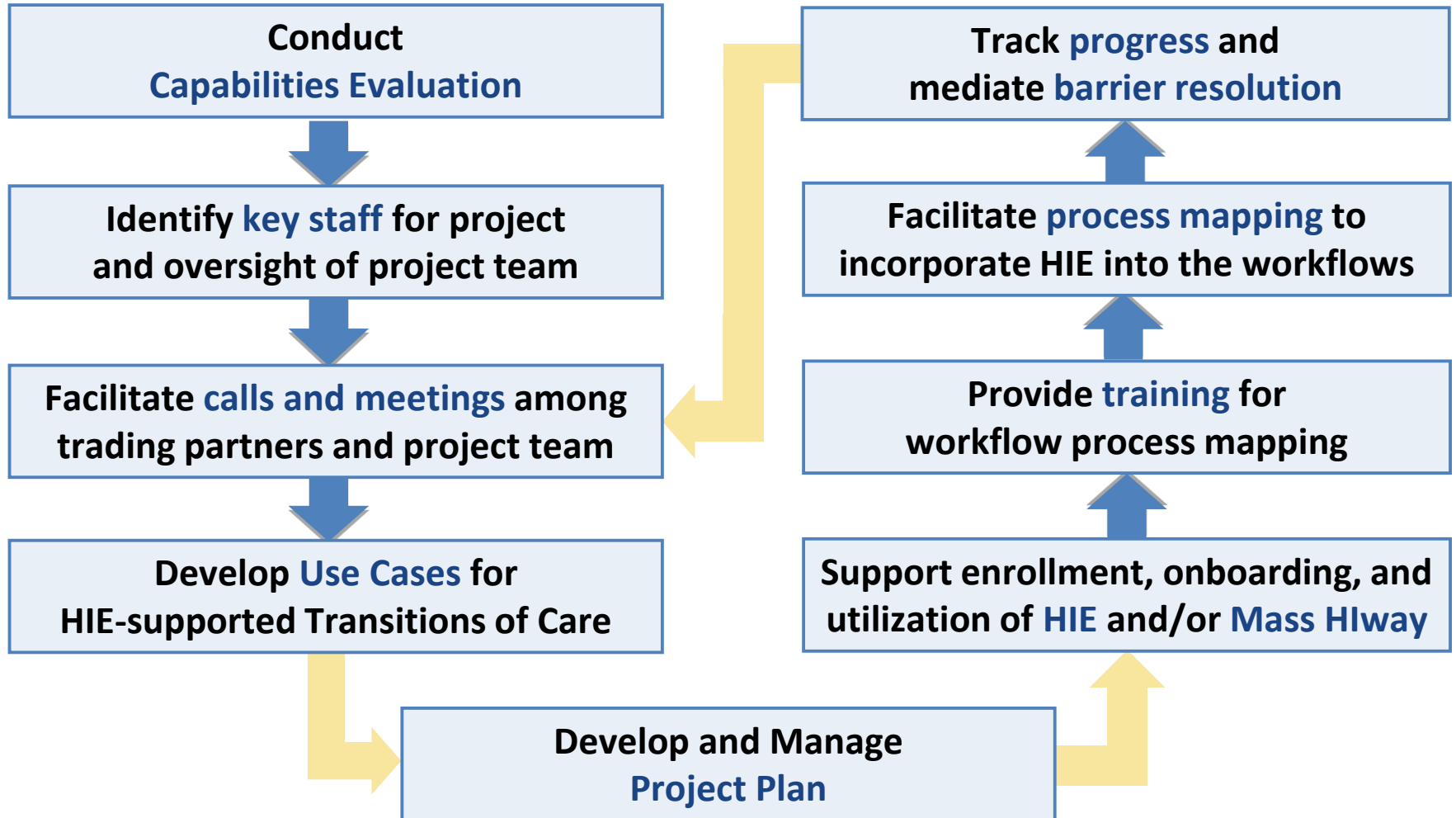
- HAUS for MassHealth Accountable Care Organizations (ACOs), Community Partners (CPs), and Community Service Agencies (CSAs), in partnership with MassHealth
- HAUS for other healthcare organizations that need to connect to the Mass HIway to meet the regulations
- HIway participants interested in using Direct Messaging to support care coordination



HAUS Services Project Overview



Hiway Account Managers conduct the following HAUS project services





Front-line HAUS support to help with enrollment, connectivity, and use of Direct Messaging

- ✓ Enrollment
- ✓ Use case identification
- ✓ Trading partner identification
- ✓ Onboarding support
- ✓ Training and workflow implementation
- ✓ HIE best practices



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Thank you!

The Massachusetts Health Information Highway (Mass HIway)

Phone: 1.855.MA-HIWAY (1.855.624.4929)

Email for general inquiries: MassHIway@state.ma.us

Email for technical support: MassHIwaySupport@state.ma.us

Website: MassHIway.net



Attestation Form “Problem Questions”



- **Year 3, 4, 5 - Question 7:** The HIway has assigned unique identification codes to provider organizations/sub-organizations. Please refer to the HIway Unique ID Spreadsheet (found on this page) to find the code assigned to your organization. Please enter the code in the field below.

If you cannot find your organization/sub-organization(s) on this spreadsheet, or if you need clarification or assistance, please email the HIway at MassHIwayAttestation@state.ma.us.

- This is an opportunity for large organizations to list their sub-organizations on the same Attestation Form as long as all practice locations utilize the same EHR installation and use the same Direct address domain listed in Question 5.*
- **NEW THIS YEAR:** Provider Organizations must enter their organization’s unique ID (and, if applicable, the unique IDs for any sub-organizations) on their attestation/exception form. Your ID is assigned by the HIway and can be found using [this document](#).

*Slides 27-31: Supplementary notes and instructions are listed in blue



Attestation Form “Problem Questions”



Year 3, 4, 5 - Question 14: Full legal name(s) and city/towns of the other entity (or entities) participating in the Provider to Provider exchange of information for the Use Case:

- Include the full name of the trading partner organization along with city/town in which it is located. Separate each organization with a semicolon.

*Slides 27-30: Supplementary notes and instructions are listed in blue



Attestation Form “Problem Questions”



Year 3, 4, 5 - Question 25: Please estimate the percent of instances of information sharing that are part of the Use Cases that are sent and/or received solely via the Mass Hlway.

If you select either of the first two responses below, please also select “Yes” to Question 26 and answer the follow up question.

- Less than 25% of the instances of information sharing that are part of the Use Cases are sent and/or received via the Mass Hlway.
- Between 25-99% of the instances of information sharing that are part of the Use Cases are sent and/or received via the Mass Hlway.
- 100% of the instances of information sharing that are part of the Use Cases are sent and/or received via the Mass Hlway.



Attestation Form “Problem Questions”



Year 3, 4, 5 - Question 26: Some organizations send one transmission via multiple information channels (e.g., a hospital sending a care plan via the Mass Hlway and also via fax). Does your Provider Organization send the information being transmitted as part of the Use Case via multiple channels?

- Yes Choose this response if your organization is also sharing clinical information with your trading partner you listed on your Attestation Form via fax, eFax, mail, phone call, secure email or sFTP.
- No Choose this response if the Mass Hlway is the only way you are sharing information with your trading partner you listed on your Attestation Form.

If yes, list other methods: fax, eFax, mail, phone call, secure email, sFTP?

If yes, indicate if there are plans to use Hlway Direct Messaging as the sole method of transmitting the information for the Use Cases:

- Yes Select if fax, eFax, mail, phone call, secure email, or sFTP will not be used in the future; only Mass Hlway will be used to share information with this trading partner.
- No Select if fax, eFax, mail, phone call, secure email, or sFTP will continue to be used.



Mass Hlway - Regulations FAQs



Mass Hlway Regulations FAQs provide Questions & Answers related to:
a) The Mass Hlway Regulations and b) The attestation process



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HIWAY REGULATIONS OVERVIEW

REGULATIONS SUMMARY

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HIWAY ATTESTATION OVERVIEW

ATTESTATION FORMS

ATTESTATION LANDSCAPE

HIWAY REGULATIONS FAQs

Version 3. Updated June 2021

In February 2017 the Massachusetts Executive Office of Health & Human Services (EOHHS) promulgated the original state regulation *101 CMR 20.00: Health Information Exchange*, which is also known as the *Mass Hlway Regulations*. These regulations implement key components of Massachusetts General Law (M.G.L.) Chapter 118I, pertaining to the Mass Hlway, which is the state-sponsored, statewide Health Information Exchange (HIE) for the Commonwealth of Massachusetts. In October 2019, the Mass Hlway Regulations were updated to define the use of regulatory frameworks to promote market-based HIE initiatives.

Click [here](#) for a summary of the Mass Hlway Regulations. Click [here](#) for the *Mass Hlway Policies and Procedures*. Attestation Forms are used by Provider Organizations to attest how they have met the requirement to connect to the Mass Hlway. The annual attestation forms can be found [here](#).

Questions regarding the Mass Hlway Regulations that are not answered by these FAQs may be sent via email to the Mass Hlway at MassHlway@state.ma.us. Mass Hlway Participants that have questions regarding technical support, can contact the Mass Hlway via email at MassHlwaySupport@state.ma.us.

Click [here](#) for a printable version of these FAQs.

FREQUENTLY ASKED QUESTIONS (FAQS)

1. BACKGROUND ABOUT THE MASS HIWAY REGULATIONS AND M.G.L. CHAPTER 118I

1.1 Q: How were the Mass Hlway Regulations developed?

A: The regulations were developed through an open, transparent process, during which EOHHS gathered feedback from the state's Health Information



Mass Hlway Regulations FAQs

Version 2. April 2018



In February 2017 the Massachusetts Executive Office of Health & Human Services (EOHHS) promulgated the state regulations *101 CMR 20.00: Health Information Exchange*, which are also known as the *Mass Hlway Regulations*. These regulations implement key components of Massachusetts General Law (M.G.L.) Chapter 118I, pertaining to the Mass Hlway, which is the state-sponsored, statewide health information exchange (HIE) for the Commonwealth of Massachusetts.

This document provides Frequently Asked Questions (FAQs) and answers that can help stakeholders understand how the regulations apply to them. Terms that are defined in Section 20.04 of the regulations, such as Hlway Direct Messaging, are capitalized in this FAQ document.

The full regulations, this FAQ document, a 2-page *Mass Hlway Regulations Summary*, and the *Mass Hlway Policies & Procedures* are available on the Mass Hlway website (www.MassHlway.net).

Several of the FAQs in this document provide information related to the Attestation Forms, which are used by Provider Organizations to describe how they comply with the requirement to connect to the Mass Hlway. Both PDF and on-line versions of the Attestation Forms are available on the Mass Hlway website.

Questions regarding the Mass Hlway Regulations that are not answered by this FAQ document may be sent via email to the Mass Hlway at MassHlway@state.ma.us. Mass Hlway Participants that have questions regarding technical support, can contact the Mass Hlway via email at MassHlwaySupport@state.ma.us.

Index of FAQs in this document:

1. Background about the Mass Hlway Regulations
2. The Hlway connection requirement: who and when
3. The Hlway connection requirement: how organizations fulfill the requirement
4. Penalties for non-compliance with the Hlway connection requirement
5. The opt-in opt-out mechanism for the Mass Hlway
6. The requirements regarding Electronic Health Records (EHRs)
7. The Mass Hlway Policies & Procedures
8. FAQs regarding Community Health Centers
9. FAQs regarding Medical Ambulatory Practices
10. Other FAQs

The [Mass Hlway Regulations FAQs](#) is available on the Mass Hlway website



1. Background about the Mass Hlway Regulations and M.G.L. Chapter 118I
2. The Hlway connection requirement: who and when
3. The Hlway connection requirement: how organizations fulfill the requirement
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9. FAQs regarding Medical Ambulatory Practices
10. Other FAQs



Section 2 – The Hlway Connection Requirement: Who and When

Question 2.9

If a healthcare organization consists of multiple Provider Organizations that each have a required Hlway connection date, may the organization use a single Attestation Form for multiple Provider Organizations?

Answer*

Each Acute Care Hospital and each Large Community Health Center must **complete a separate Attestation Form** even if the Acute Care Hospital or Community Health Center is part of a larger healthcare organization.

* However, **in 2021**, if a healthcare organization includes multiple Medium or Large Medical Ambulatory Practices that have required Hlway connection dates, then these Medium or Large Medical Ambulatory Practices can be included in **a single Year 4 Attestation Form** if each of the practices (a) use the same instance of an EHR installation, and (b) use the same Direct address domain name.

The Mass Hlway may require Medical Ambulatory Practices to submit separate Attestation Forms as it deems necessary.

Organizations can contact the Mass Hlway with questions regarding whether multiple practices can be included in a single Attestation Form.



Section 3 – How Organizations Fulfill the Connection Requirement

Question 3.2

What is the definition of a Use Case in the Hlway Connection Requirement?

Answer*

101 CMR 20.04 defines a Use Case as a narrative that describes how to accomplish a business goal that can be implemented between two or more organizations. The Use Case must be based on Provider-to-Provider Communications (*e.g.*, Acute Care Hospital sending discharge summary to primary care provider)

Fulfilling the Hlway Connection Requirement involves **sending and/or receiving Hlway Direct Messages for a Use Case**. A technical connection to the Hlway without using that connection is not sufficient to meet the requirement.

* EOHHS expects Provider Organizations to use Hlway Direct Messaging, to the extent feasible, for all instances of info sharing in the implemented Use Case, regardless of the number of Hlway Direct Messages transmitted as part of the Use Case.

However, **in 2021, using Hlway Direct Messaging for all instances of info sharing that are part of the Use Case is not required.**

In some Use Cases, Provider Organizations may use Hlway Direct Messaging for some instances of info sharing, while using alternate methods (*e.g.*, fax or mail) for other instances. For example, a hospital might send discharge summaries to Department X at Nursing Home A via Hlway Direct Messaging, while sending discharge summaries to Department Y at Nursing Home A via fax.

Implementation of a Use Case involves using Hlway Direct Messaging as part of an ongoing workflow. Using Hlway Direct Messaging in a pilot project or testing phase of using Hlway Direct Messaging is not considered a fully implemented Use Case. Also see question 3.3.



Section 8 – FAQs regarding Community Health Centers

Question 8.3

If a single Community Health Center has one or more satellite locations or school-based satellite clinics, does each satellite location need to submit a separate Attestation Form?

Answer

The satellites do not need to submit a separate Attestation Form (also see Mass Hlway Regulations FAQ - question 2.6).



Section 9 – FAQs regarding Medical Ambulatory Practices

Question 9.4

If a medical practice is providing both specialty inpatient and specialty outpatient healthcare services within the facilities of an Acute Care Hospital, is this practice considered a Medical Ambulatory Practice?

Answer*

The practice is not considered a Medical Ambulatory Practice for the purpose of the Mass Hlway Regulations if the following two criteria are met:

- a) a majority of patients, to whom the practice delivers services, receive services within an Acute Care Hospital's facilities, and
- b) the practice uses the same instance of an EHR system installation as the Acute Care Hospital
If the practice and the hospital both use an EHR system made by the same vendor, but they use different instances of an EHR system installation, this criterion has not been met


* For example, consider the case of a medical practice that consists of a group of emergency room physicians that exclusively cares for patients within the facilities of an Acute Care Hospital's emergency department, and this medical practice uses the same instance of the Acute Care Hospital's EHR system. In this case the medical practice of emergency room physicians is not considered a Medical Ambulatory Practice for the purpose of the regulations because: (1) all the patients they care for are receiving services within the Acute Care Hospital's facilities, and (2) the physicians in this medical practice use the same instance of an EHR system implementation as the Acute Care Hospital. Since this medical practice of emergency room physicians is not considered to be a Medical Ambulatory Practice for the purposes of the regulations, then at this time, it does not have a required Hlway connection date and it is not required to submit an Attestation Form.




This fact sheet provides patients key information about the Mass HIway

- The Mass HIway does not function as a clinical data repository that holds electronic medical records for individuals
- Patients' electronic health record(s) are held by provider organizations and not the Mass HIway
- *Note: Distribution of the Fact Sheet for Patients is not a requirement to use HIway Direct Messaging*

The Mass HIway Fact Sheet for Patients





The Mass HIway is a secure statewide Health Information Exchange that allows your healthcare providers to safely and quickly send your health information to where it is most needed.

Doctors or nurses can care for you better when they have important information about your health. The Mass HIway is designed to make this safer and faster. The goal is better care coordination and quality for you and your family.

<p>What is the Mass HIway?</p> <ul style="list-style-type: none"> • Mass HIway is the statewide health information exchange (HIE). Healthcare providers can use the Mass HIway to quickly and securely send and receive your health information to better coordinate your care. • The Mass HIway is managed by the Commonwealth of Massachusetts' Executive Office of Health and Human Services (EOHHS). <p>How does the Mass HIway protect my information?</p> <p>The Mass HIway has security measures in place to protect your information that aren't true of current methods, like fax, mail, or portable media like a CD or USB (flash drive), such as:</p> <ul style="list-style-type: none"> • Using a special code so that only authorized providers can read the information sent over the Mass HIway (this is known as encrypting data). • Establishing policies and procedures that authorize the Mass HIway to suspend HIway participants as necessary to prevent unauthorized use of the Mass HIway. • Overseeing who has access to the Mass HIway and who has used it for a patient's healthcare. 	<p>How can the Mass HIway help me?</p> <ul style="list-style-type: none"> • If you were discharged from a hospital, the Mass HIway can be used by the hospital to send your doctor a note about your hospital stay so that he or she is up to date about healthcare that you have received. • If you get tests done, the doctor can use the Mass HIway to send the results to other members of your healthcare team, like your specialist. This helps them coordinate your care. It can also save time and money by reducing the need for repeat tests. • If you have a chronic condition, your health insurer case manager can use the Mass HIway to communicate with your doctors to coordinate your care and help you stay healthy. • Not all of your healthcare providers may be using the Mass HIway yet. There may be more benefits to you as more healthcare organizations use the Mass HIway. 	<p>Who can use Mass HIway and why?</p> <ul style="list-style-type: none"> • Currently the Mass HIway may only be used by healthcare organizations (like doctors' offices, hospitals, public health agencies, and health insurers). • The Mass HIway can only be used for information sharing as allowed by federal and state privacy laws. You still need to give special permission for providers to request and receive certain sensitive information. You can speak to your healthcare provider about what information is sent over the Mass HIway. <p>Can I request my medical record from the Mass HIway?</p> <ul style="list-style-type: none"> • No. A patient's medical record itself is not part of the Mass HIway system. Talk to your provider for information about how to obtain your medical records. <p>Want more information?</p> <ul style="list-style-type: none"> • Talk with your doctor or their office staff about how they are using the Mass HIway. • Visit www.masshiway.net, email us at masshiway@state.ma.us, or call us at 1-855-MA-HIway (624-4929) and press 3.
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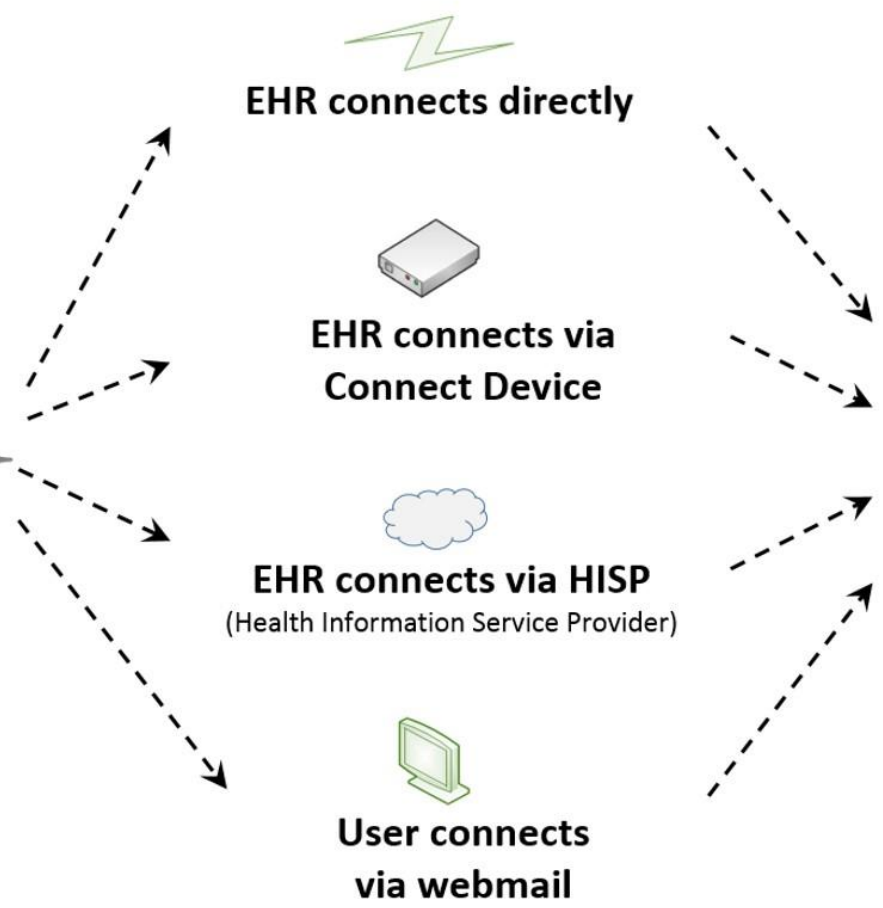
Connectivity Options



User types



Connectivity options



HIE services

