

Arizona

Health Information Exchange (HIE)

Issues, Risks, and Mitigation Plans Workgroup

October 6, 2010



**Governor's Office of
Health Information Exchange**

hie@az.gov

Agenda

- Updates
 - Strategic and Operational Plans
 - Federal Feedback
 - Technical Infrastructure Workgroup
 - Website updated – <http://azgovernor.gov/hie>
 - Next meeting on Wednesday, October, 27th
- Role of the Workgroup
- Issues, Risks and Mitigation Plans
- Next Steps

Strategic and Operational Plans

- Federal approach/process for review
- Internally made updates
- Federal feedback
 - Further gap analysis
 - Plan to address additional gaps identified

Role of the Workgroup

- Make recommendations on HIE infrastructure
 - Technical Infrastructure – “open architecture” and “standards-compliant”
 - Feedback on analysis and component prioritization
 - Issues, Risks, and Mitigation Plans
 - Other workgroups

Introduction

- Jason Mistlebauer, MPA
- Governor's Office of Economic Recovery
- Governor's Office of Health Information Exchange
- Grants Management Analyst
- Background
 - Public sector
 - Arizona State University

ISSUES, RISKS, AND MITIGATION PLANS

Issues, Risks, and Mitigation Plans

Identified Categories

- Legal
- Financial
- Competitive
- System

5 Domain-Specific Areas

- Governance
- Finance
- Technical Infrastructure
- Business and Technical Operations
- Legal/Policy

System: Platform Capabilities

- Risk: Vendor(s) selected have difficulties providing core capabilities within the required time frame to meet meaningful use.
- Mitigation: Rigorous due diligence process followed by strict vetting of core system capabilities. Work with experienced stakeholders statewide to ensure capabilities align with current community systems. A clear definition of requirements prior to implementation with vendor(s) and stakeholders will happen in the initial phases.
- Likelihood to Occur: Medium
- Project Impact: High

System: Implementation

- Risk: Inability to meet milestones from both a time and capability standpoint will put the entire State at risk.
- Mitigation: GOHIE will work with the stakeholders to define the requirements to ensure the expectations are clear for all parties. A clear and concise implementation roadmap will be developed in collaboration with all stakeholders. Clear escalation procedures will be agreed upon by all parties for accountability purposes.
- Likelihood to Occur: Medium
- Project Impact: High

Competitive: Community Data Sharing Initiatives

- Risk: Organizations may choose to implement community sharing initiatives in their service areas and bypass the statewide HIE.
- Mitigation: The Governor's Office will work with all of the stakeholders to ensure that they will participate with the statewide HIE. Engaging stakeholders early in the technology planning processes will help ensure organizations are using key standard, technologies, and vocabulary.
- Likelihood to Occur: Low
- Project Impact: Medium

Financial: Sustainability

- Risk: Implementing an HIE platform that is not financially viable for long-term sustainability.
- Mitigation: The appropriate mix of contributions from all participants must be established for this system to be viable. The community of stakeholders are charged with identifying the appropriate costs of HIE services and with what the market can bear for long-term sustainability. GOHIE will facilitate this process during the 4-year implementation and create a transition plan for long-term system ownership.
- Likelihood to Occur: Medium
- Project Impact: Medium

Financial: Project Costs

- Risk: The total actual project costs exceed the current estimated amount.
- Mitigation: Two potential mitigation strategies could be deployed:
 - Reduce the project scope to align more closely with the initial project budget.
 - and/or
 - Seek additional funding from participants to ensure the overall project scope is met.
- Likelihood to Occur: High
- Project Impact: High

Financial: Cost Containment

- Risk: The proposed overall project costs greatly exceed the funding available within the ONC HIE grant. Improper pricing of services in comparison of value and the cost of the services could negatively impact participation, thus increasing costs to those that are participating.
- Mitigation: The Governor's Office will help facilitate the initial and ongoing cost structures associated with the implementation of the statewide HIE. Cost sharing and sustainability is something that must be addressed by the stakeholders and health care community so the system is affordable and is not a significant burden on those participating.
- Likelihood to Occur: Medium
- Project Impact: Medium

Legal: Privacy and Security

- Risk: Improper exposure of personal health information.
- Mitigation: Privacy and security are the number one priority and will remain at the forefront of all conversations with stakeholders.
- Likelihood to Occur: Medium
- Project Impact: High

Legal: Consent

- Risk: The approach to consent in the State of Arizona is outstanding. In 2008, legislation was proposed favoring an “opt-out” approach to electronic health information consent. However, the legislation was not passed due to inconclusive statewide strategy for health information exchange at that time.
- Mitigation: GOHIE realizes that the consent issue needs to be addressed early on in this process and will be targeted in the operational plan.
- Likelihood to Occur: High
- Project Impact: High

Legal: Participation Agreement

- Risk: A participant agreement must be developed for distribution and stakeholder buy-in. The participant agreement should address all legalities associated with implementation of a statewide HIE to minimize the liability to the Governor's office and other project stakeholders.
- Mitigation: The Governor's Office intends to approach legal counsel when developing and finalizing the participation agreement. The legal counsel will seek feedback from the provider community in the modifications proposed to the agreement. The various stakeholders and Steering Committee will review and approve the final document for use by the statewide HIE. Providers will not be permitted to modify the document once it has been finalized.
- Likelihood to Occur: Low
- Project Impact: Medium

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Thoughts?

NEXT STEPS



Aaron Sandeen
Health Information Technology (HIT)
State Coordinator
602.501.3261
asandeen@az.gov

Jason Mistlebauer
Grants Management Analyst
602.819.4475
jmistlebauer@az.gov

Ryan Sommers
Manager of IT Projects and Services
602.881.5738
rsommers@az.gov

hie@az.gov
<http://azgovernor.gov/hie>