

TITLE: CONNECTDIRECT PRIVACY AND RELEASE OF INFORMATION POLICY	
STATUS: FINAL	EFFECTIVE DATE: 03/01/2022
VERSION: 3	PAGE: 1 OF 2

I. PURPOSE

This Policy defines Permitted Purposes for which Health Data may be disclosed.

II. SCOPE

This Policy applies to CCHIE, Participants and Users of CCHIE's ConnectDirect Service.

III. POLICY

- A. CCHIE facilitates private and secure directed exchange of Health Data among its Participants and Participant Users and has no role in collecting, using, or disclosing PHI through the ConnectDirect Service.
- B. The use of the ConnectDirect Service will be conformant with applicable federal and state laws, including but not limited to security and privacy laws.
- C. Participants shall be responsible for their Users compliance with the Agreement and current ConnectDirect Policies and Procedures.
- D. Participant and Participant Users shall protect the privacy, security and integrity of the information exchanged through the ConnectDirect Service.
- E. Participant and Participant Users agree to use the ConnectDirect Service to send Health Data or use Health Data received from other Direct participants only in strict compliance with HIPAA, HITECH, other applicable law, and at all times in conformance with the national Direct Standard™ and Direct "Rules of the Road".
- F. Participant and Participant Users shall make the determination that it is clinically and legally appropriate to send Health Data to other Direct participants and that the receiver of the information agrees to use the information for the purpose it was sent, not for other purposes.
- G. Participant and Participant Users shall fulfill all legal, regulatory and policy requirements such as obtaining patient consent, authorization, accounting of disclosures, privacy

notices, data use restrictions incumbent on the receiver, and the like prior to exchanging Health Data.

- H. Participant and Participant Users shall obtain any and all patient consent and/or authorizations necessary under federal or state law prior to the release and exchange of PHI and/or Super Protected Data via the ConnectDirect Service
- I. Participant and Participant Users shall ensure the patient’s privacy preferences are being honored.
- J. Participant and Participant Users shall be responsible verifying that a receiver's Direct address is correct.
- K. Participant and Participant Users and receiver shall not require common or pre-negotiated patient identifiers. Like the exchange of fax or paper documents, there is no expectation that a received message will be automatically matched to a patient or automatically filed into an electronic health record.
- L. Participant and Participant Users are responsible for ensuring accuracy, completion, and currency of patient information sent using the ConnectDirect Service.
- M. Participants and Participant Users will follow existing laws in cases of a security breach.

IV. Revision History

DATE	AUTHOR	COMMENTS
3/2018 – 8/2018	Dianne Clark, Laura Mosesso and Joanne Onyshko	Initial draft of CCHIE HISP Service Policies
2/16/2022	Laura Mosesso	Updated HISP Services to ConnectDirect Service, updated verbiage for applicability and consistency across all ConnectDirect materials.
3/1/2022	Laura Mosesso	Finalized Policy