



Health Information Exchange (HIE) Security and Privacy Questions

Q: How do we know the OneHealthPort HIE meets the updated HIPAA Security and Privacy requirements?

A: The Washington State Health Care Authority in partnership with OneHealthPort (OHP) reassessed all policies and has updated the Security Policy and Business Associates Agreements in the contract structure to reflect the latest HIPAA requirements. That process included a comment period for all HIE participants. Feedback from the comment period was incorporated into the updated final documents.

In addition, OneHealthPort is currently in the process of a HIPAA and SSAE 16 Type 2 compliance audit.

The HIE technical contractor, Axway, was certified in 2012 by an external audit firm for compliance with HIPAA security. Axway is currently in the process of completing an independent SSAE 16 Type 2 (formerly SAS70) compliance audit.

Q: We have heard that the OneHealthPort HIE is hosted at Amazon Web Services which doesn't sign Business Associate Agreements (BAA). Isn't this required?

A: OneHealthPort utilizes Axway Managed and Hosting Services and Axway subcontracts with Amazon Web Services for servers and the hosting location. In order to execute a BAA, Amazon requires partners to utilize dedicated servers. OneHealthPort HIE moved to dedicated servers in order to execute the BAA. OneHealthPort, has a current and compliant BAA with all its contracted

trading partners. OHP and Axway have a current and compliant BAA in support of their contract relationship. Axway and Amazon have a current and compliant BAA in support of their contract relationship.

Q: Did HCA or DOH require OneHealthPort HIE to complete a separate security questionnaire?

A: OneHealthPort, as a standard business practice, has elected to use an external auditing firm for HIPAA and SSAE16 audits on a multi-year basis. HCA and DOH reviewed the audit certification for 2012 for Axway and Amazon and accepted it as evidence of compliance. Obtaining compliance certification from an independent accredited firm provides a clear, consistent, and unbiased evaluation of the contractors' security and privacy practices.

Q: Is there an oversight structure in place for OneHealthPort?

A: There is a seven-member HIE Oversight Board. Four members are appointed by HCA and three members are appointed by OHP. The scope of the board's oversight responsibility includes HIE pricing, HIE privacy and security policies and HIE access policies.

Q: If I have more questions, how do I get them addressed?

A: You may send an email to HealthIT@hca.wa.gov, and you will receive a response in a timely fashion.