

Central PA Connect

HEALTH INFORMATION | EXCHANGE

Policy Title:	PA Navigate				
Effective Date:	4/1/2025	Revision Date:	N/A	Review Date:	4/1/2025
Policy Owner:	Marianne Smith				
Policy Approver:	Keith Cromwell				

POLICY PURPOSE:

This policy addresses SDOH (social determinants of health) data sharing via PA Navigate.

POLICY STATEMENT:

This policy details the requirements for data sharing and use by a Central PA Connect Member Organization that is sharing SDOH data via PA Navigate. Through this integration, SDOH data will be made available to clinical care teams as well as to population health and care management staff who are actively managing SDOH needs or the care of a particular patient. While SDOH data does not currently meet the requirements of PHI, we believe confidentiality is still of utmost importance and our goal is to treat the data confidentially as if it were PHI.

To the extent that SDOH data may include super protected data, CPC will comply with all applicable state and federal requirements governing the sharing of such data.

This Policy in conjunction with the following UPHS Policies collectively detail the requirements for data management and use by a Central PA Connect Member Organization:

- Access Controls for Information Assets
- University of Pennsylvania Health System Disclosure of PHI with Patient Authorization
- Hospital Acceptable Use of Electronic Resources
- University of Pennsylvania Health System Breach Notification

APPLICABILITY/SCOPE/EXCLUSION:

The policy is applicable to all Central PA Connect Member Organizations who have chosen to connect to PA Navigate.

DEFINITIONS:

Community Benefit Organization: are non-profit entities that operate within a specific community or geographical area. They aim to address local needs and improve the well-being of residents.

Data Provider: means a Member Organization that provides patient data to the CPC-HIE.

Data Recipient: means a Member Organization that receives or accesses patient data from the CPC-HIE. This includes SDOH data for this policy's purpose.

Member Organization (MO): means individuals and entities (including, but not limited to, Health Care Providers, physician practices health care facilities, medical laboratories, payers, etc.) that enroll in and connect to CPC-HIE to send and/or receive health information.

Patient: means any person for whom the Member Organization or Community Benefit Organization is a custodian for patient data.

Patient Data: means health information that is created or received by a Member Organization or Community Benefit Organization and relates to past, present, or future physical, social or mental health of an individual or the provision of health care to an individual that identifies the individual or with respect to which there is a reasonable basis to believe the information can be used to identify the individual, including such information that is made available for exchange by a data provider. Patient Data includes Protected Health Information and Super Protected Data.

Protected Health Information (PHI): shall have the meaning given in 45 CFR § 160.103 and includes Electronic PHI.

Super Protected Data: means Protected Health Information that, under Applicable Law, requires a higher level of consent for Use and Disclosure, including HIV-related information, under 35 P.S. § 7607 (also known as Act 148) and its implementing regulations, mental health treatment information under the Pennsylvania Mental Health Procedures Act, 50 P.S. §§ 7107-7116, and its implementing regulations set forth at 55 Pa. Code. § 5100, et seq., and the Pennsylvania Drug and Alcohol Control Act, 71 P.S. § 1690.108(c) and its implementing regulations at 4 Pa. Code § 255.5, et seq., as well as federal law and regulations governing the Confidentiality of Substance Abuse Disorder Patient Records, set forth at 42 U.S.C. § 290dd-2 and 42 C.F.R. Part 2.

PROCEDURE:

This policy is intended to support the contribution and sharing of SDOH data within the system of existing CPC HIE data exchange. The ways this can be accomplished include, but are not limited to:

- Establishing a web-based electronic platform for SDOH data sharing among other HIEs, CBOs (Community Benefit Organizations), providers and payer organizations where Authorized Users may view SDOH data contributed by other Authorized Users for individuals/patients that they have in common;

- Integrating PA Navigate with a Member Organizations' systems of record, such as electronic health records (EHRs), care management systems, or workflow management systems, with SDOH-related data moving between these integrated systems;
- Extracting data from PA Navigate and/or Member Organization(s) system of record for use in CPC's HIE data sharing model, where it can be viewed by Authorized Users and through which it can be sent to downstream receivers.

This policy requires member organizations and community benefit organizations that participate with PA Navigate through Central PA Connect (CPC) are required to grant CPC staff access to their member node.

CBOs that are not Covered Entities or Business Associates of a Covered Entity will receive only data directly intended for them (e.g., as when a healthcare provider initiates a referral to a CBO), data they created themselves (such as a referral), or follow-ups to referrals they initiated.

Patient consent for information about them to be shared with a CBO for purposes of fulfilling the referral will be collected electronically on a per-referral basis. This may be a direct consent by a patient who is self-screening or self-referring, or a verbal consent documented by a healthcare worker referring on a patient's behalf using PA Navigate.

PROHIBITED ACTIVITIES:

Data Provider shall not knowingly or negligently allow any information to be transmitted that violates the proprietary rights, privacy rights, or any other rights of a third party, including any patient.

Data Recipient may not use or permit the use of patient data for any purpose or use other than for the permitted uses noted above or in any manner prohibited by HIPAA or other applicable law, including the laws related to Super Protected Data.

REVIEW AND VIOLATIONS: N/A

ROLES AND RESPONSIBILITIES: N/A

APPENDICES: N/A

FORMS: N/A

REFERENCES: N/A

- Access Controls for Information Assets
- University of Pennsylvania Health System Disclosure of PHI with Patient Authorization
- Hospital Acceptable Use of Electronic Resources
- University of Pennsylvania Health System Breach Notification