

Title: Gateway Partner Policy – SSA
Date: 11/26/2014
Policy No.: Florida HIE-TBA

Summary: This policy establishes parameters for health information exchange with the Social Security Administration (SSA) as a Gateway Partner through the eHealth Exchange. The policy proposes to allow exchange for disability determinations where consent to query is obtained by the SSA and delivered to the Florida HIE on behalf of nodes exchanging with the SSA. It describes the process for maintaining compliance with the policy.

Proposal: Health information exchange for purposes of the disability determination will be permitted with the SSA as a Gateway Partner through the eHealth Exchange if mutually agreed by the Florida HIE node and the SSA. Participating Florida HIE nodes will sign the eHealth Exchange addendum. The policy would apply to inbound requests of the SSA to the Florida HIE node(s).

Each patient discovery query issued by the SSA with a patient returned, whether or not a document is retrieved, must be accompanied by submission of the signed explicit patient authorization/consent form. The SSA consent form **Authorization to Disclose Information to the Social Security Administration** (SSA-827) shall be used.

The SSA as a Gateway Partner must provide documentation to the Florida HIE prior to or concurrent with the Florida HIE processing the SSA transaction for patient discovery, query for document, or retrieve document with participating Florida nodes. Failure to provide the appropriate SSA-827 to the Florida HIE would be cause for cessation of exchange with the SSA until the SSA comes into compliance.

If requested by a node exchanging with the SSA, the Florida HIE shall send a copy of the requested consent forms by Direct Messaging to the node with 72 hours of receipt of the request. Nodes will use Direct Messaging to request copies of consent forms specifying patient name, gender, birth date and other applicable identifiers.

The Gateway Partner approval process will begin upon mutual agreement of the SSA and each Florida HIE node that wishes to exchange with the SSA. The SSA will notify the Florida HIE prior to initiating production exchange with a Florida HIE node and the Florida HIE will verify receipt of a signed eHealth Exchange addenda from the applicable Florida HIE node.

Risks/costs: Florida HIE nodes must monitor for compliance as they determine appropriate. The Florida HIE must take action if the SSA as a Gateway Partner fails to come into compliance.

Benefits: This policy allows for exchange with the SSA for purposes of disability determinations among willing Florida HIE nodes consistent with the patient authorization policies of the Florida HIE. The policy enables the SSA to make use of the ability of PLU to discover patient records to

speed the process of disability determination and provides an efficient means for participating nodes to provide medical records to the SSA.

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