

The DirectTrust Health Information Exchange Governance Project

Cooperative Agreement
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Revised Awardee Work Plan Developed in Collaboration with ONC

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Introduction

The DirectTrust Health Information Exchange Governance Project (“Project”) is a collaborative project within the Exemplar HIE Governance Program of ONC, pursuant to a cooperative agreement awarded by ONC to DirectTrust.org, Inc. (“DirectTrust”), a 501(c)(6) not-for-profit, effective March 25, 2013.

As contemplated in the Funding Opportunity Announcement (“FOA”), HIEGE-HG-12-001, and the awarded proposal, immediately post-award ONC and DirectTrust collaborated to develop this revised Work Plan, further defining the topics of DirectTrust’s work on the Project. The details of the revised Work Plan are set forth below, and supersede any contrary provisions of DirectTrust’s proposal or the award documents. DirectTrust will continue to meet the reporting obligations set forth in the FOA.

As of the date of this revised Work Plan, and since the award announcement on March 26, 2013, DirectTrust has accomplished the following Project objectives:

1. David C. Kibbe, MD, DirectTrust President and CEO, and Grantee Project Director, met with ONC Project Director, Kory Mertz via telephone March 27, 2013 and for a “kick off” planning session March 29, 2013, and in person for a two-hour planning session April 17, 2013 in Washington, DC.
2. David C. Kibbe, MD attended and participated as a speaker at the ONC HIE Interoperability Summit on April 18, 2013. Dr. Kibbe co-presented with Paul Tuten, ONC consultant, on the topic of Scalable Trust and accreditation of HISPs, CAs, and RAs under the EHNAC-DirectTrust Direct Trusted Agent Accreditation Program (DTAAP).
3. DirectTrust has facilitated the dissemination of the current Federation Agreement, which has been signed by eight (8) HISPs and is effectively a proxy for accreditation during this “transitional” period of the EHNAC-DirectTrust DTAAP roll out.
4. Under Dr. Kibbe’s direction, and in collaboration with DirectTrust volunteer leadership, all four (4) active DirectTrust Workgroups and one (1) Sub-Workgroup have held weekly meetings to commence planning around the Scope of Work Areas included in the Project.
5. As of April 1, 2013, DirectTrust published the first draft of its “Transitional Community Trust Bundle Scope of Operations” document, which is the work product of the DirectTrust Trust Anchor Bundle Operations Workgroup (TBO Wg), and which describes the policy and governance framework for trust anchor certificate preparation, submission, and approval for inclusion in trust anchor bundles.
6. We have built an operational, EVcertificate-secured website <https://bundles.directtrust.org>, for use as a prototype to launch the trust anchor bundle download site.
7. David C. Kibbe, MD and six (6) DirectTrust volunteer Workgroup chairs and co-chairs met in person for a full day planning session to finalize the revised Work Plan and budget for the Project. John Blair III, MD, Chairperson of DirectTrust’s Board of Directors, Elise Dieterich,

Esq., counsel for DirectTrust, Kory Mertz, ONC Project Officer, and three (3) members of the Kutak Rock LLP staff team were in attendance for portions of this meeting.

8. DirectTrust has joined and actively participated in the new ONC HIE Governance Forum, and David C. Kibbe, MD has volunteered to serve on the Board of Directors for that initiative.
9. As part of DirectTrust's outreach and communications efforts associated with the award, David C. Kibbe, MD has committed to attend and speak on the subjects of DTAAP, Scalable Trust, trust anchor bundle distribution services, and DirectTrust governance issues at the following meetings and conferences:
 - a. The ONC Governance Update webinar, sponsored by NeHC, May 10, 2013.
 - b. The 22nd Annual WEDI National Conference: "Accelerating Health IT Strategy and Execution," May 15, 2013, in person in Las Vegas, Nevada.
 - c. The Fifth Annual CMS Multi-State Medicaid HITECH Conference, May 23, in person in Bethesda, Maryland.
 - d. The Redwood MedNet "Connecting California in 2013" Annual Conference, July 25, 2013, in person in Rohnert Park, California.

Revised Work Plan

In the letter from ONC dated March 26, 2013 ("ONC Award Letter") notifying DirectTrust of its ONC award for the Exemplar HIE Governance Program (the Program), four (4) areas were included in the Proposed Scope of Work. Below, the four areas as described in the letter with timelines are included, after which a brief overview and update of the ongoing work at DirectTrust is described as of mid-May, 2013. Finally, Work Plan items scheduled for completion during the Project's remaining months are listed and described, and deliverables noted with timelines.

Scope Area One, National Accreditation:

Proposed scope per ONC Award Letter:

Launch national accreditation program for HISPs and achieve wide scale participation by HISPs by the end of 2013 (target should be 50% of HISPs).

Timeline: DirectTrust accreditation launched by May, 2013; widespread participation in accreditation by HISPs by December, 2013.

The EHNAC-DirectTrust accreditation program, the Direct Trusted Agent Accreditation Program (DTAAP), went "live" on February 4, 2013, after many months of work. For several weeks prior to that date, five (5) HISPs had been participating in a "beta accreditation program", through which the

accreditation requirements and criteria were and still are being self-attested to, and weekly meetings are held to discuss and make refinements to the criteria as necessary.

Agreed work to be completed for Scope Area One –

- Adjustments will continue to be made to the existing Direct Trusted Agent Accreditation Program (DTAAP) requirements and criteria to qualify and address policy questions based on feedback from HISPs, CAs, and RAs in the process of accreditation self-attestation and audit. This will require ongoing discussion within DirectTrust and within the Exemplar HIE Governance Program with ONC and the New York eHealth Collaborative. Reviews of DTAAP criteria and requirements will occur no less than quarterly during the term of the Program.
- DirectTrust will create and maintain an Accreditation Status web page on its website which will be used to recognize the HISPs, Certificate Authorities (CAs), and Registration Authorities (RAs) who have achieved DTAAP “candidate status,” and to recognize those who have completed full accreditation including site visit audit. This page will link to the appropriate page at EHNAC where additional information on DTAAP entity information related to accreditation can be located. This page will be available to the public for viewing by end of May, 2013.
- DirectTrust will create marketing and outreach materials appropriate to the technical and non-technical audiences to whom Direct implementations are of interest, focusing on those organizations or groups of entities that are currently operating as HISPs, CAs, or RAs or plan to do so in the immediate future. These materials will be developed starting in May, 2013, and will continuously be updated and added to over the course of the Award period. They will be displayed and made available for download from the DirectTrust website, and also circulated as possible and appropriate at speaking events and exhibit opportunities. The intent of the marketing and outreach materials will be to provide a clear and concise explanation of the benefits to the Direct stakeholder community of the EHNAC-DirectTrust accreditation and the trust anchor bundle distribution services that are closely linked to accreditation, and will aim to recruit HISPs, CAs, and RAs to both become accredited and to participate in the trust anchor bundles.
- A “cross walk” between DTAAP accreditation requirements for CAs and RAs who may have established relevant certifications or accreditations with entities that perform security audits in other industry sectors with which the CAs and RAs do business, e.g. federal agencies, e-commerce, banking, etc., with those other industry audits. The extent to which these certifications can be substituted for portions of the DTAAP accreditation and audit/site visit needs to be determined. This will require a “cross walk” between DTAAP criteria and, for example, Federal Bridge Certificate Authority (FBCA) and WebTrust certifications or accreditation criteria. We expect to complete this activity by end of February, 2014.
- Our goal is to have fifty (50) HISPs, CAs, and RAs reach candidate or full accreditation status by the end of the first quarter of 2014. We plan to reach this goal by attaining ten (15) candidate or fully accredited HISPs, CAs, and RAs by the end of June, twenty five (25) by the end of September, and forty (40) by end of December, 2013.

Scope Area Two, Policy Alignment and Implementation:

Proposed scope per ONC Award Letter:

Align policy and procedure requirements for accreditation with ONC guidance (reflecting the consensus reached in 2012 Scalable Trust Meeting).

Timeline: Policies incorporated into DirectTrust accreditation by July, 2013

Agreed work to be completed for Scope Area Two – Here are some areas where work is needed.

- DirectTrust will participate with ONC in a review of DTAAP requirements. The goals will be to assess the current state of alignment, any gaps, and any possible mis-alignments or areas of disagreement between DirectTrust policy and ONC guidance that will be released in May, in order to bring these into alignment with those of ONC. This will be completed by end of July, 2013.
- A HISP Operating Policy document (HOP) will be developed by DirectTrust membership, as an analogue of the DirectTrust Certificate Policy (CP) which is used by CAs and RAs within the DirectTrust community, and attested to as part of the DTAAP.
Development of the HOP offers a unique opportunity for policy alignment and implementation with ONC policy and governance for Directed exchange, per the second Scope Area discussed below.

Work on the HOP will commence by August 1, 2013, and a draft for trial use will be completed by end of first quarter, 2014.

Scope Area Three, Exchange and Distribution of Certificate Trust Anchor Bundles:

Proposed scope per ONC Award Letter:

Implement the technical mechanism and process for trust anchor exchange that will be included in the [Implementation Guide for Direct Project Trust Bundle Distribution](#) (accredited HISPs uploading trust bundles, Direct trust hosting trust bundles). Exchange of trust anchors by HISPs will enable provider-provider and provider-patient Direct exchange across vendor boundaries, without requiring the more cumbersome manual loading of public keys. Trust bundles for provider-provider exchange (TOC) will reflect ONC guidance. Trust bundles for provider-patient exchange (VDT) will be the BlueButton+ trust bundles.

Timeline: DirectTrust accredited HISPs are exchanging trust bundles by May 31, 2013.

As of April 1, 2013, DirectTrust published the first draft of its “Transitional Community Trust Bundle Scope of Operations” document, which is the work product of the DirectTrust Trust Anchor Bundle Operations Workgroup (TBO Wg), and which describes the policy and governance framework for trust anchor certificate preparation, submission, and approval for inclusion in trust anchor bundles.

Subsequent to publishing this document, the previously mentioned trust bundle went into operation for the purpose of distributing trust anchors between HISPs in accordance with the [Implementation Guide for Direct Project Trust Bundle Distribution v1.0](#). This trust bundle facilitates establishing scalable HISP to HISP trust between parties that have achieved DTAAP accreditation candidate status and meet all other requirements defined by the trust community profile. In addition, this bundle is consumable by third party applications as described by the [Blue Button+ Implementation Guide](#) for the purpose of trusting HISPs servicing data holders.

We have built an operational, EVcertificate-secured website <https://bundles.directtrust.org>, for use as a trust anchor bundle download site.

Agreed work to be completed for Scope Area Three –

- DirectTrust will develop a technical and business plan for the infrastructure of hardware, software, personnel, and hosting solution required for DirectTrust trust anchor certificate collection, management, and distribution in bundles. Work on this plan is currently underway, and a comprehensive technical and business plan will be completed by August 31, 2013.
- DirectTrust will develop and operate the prototype infrastructure and software to host trust anchor bundles and manage their distribution on a manual and volunteer staffing basis. This infrastructure and software will include:
 - High availability cloud hosting with database support
 - EV certificate for SSL
 - Certificate for bundle signing
 - DNS Domain registration

- DirectTrust will define and implement at least one trust anchor bundle profile by end of May, 2013. Other profiles will follow as the market demands them. As described above, this profile permits a trust anchor bundle to be made public that is inclusive of the trust anchors from HISPs and CAs in the Transitional Trust Community, which is defined as the entities that have signed the DirectTrust Federation Agreement and reached either full accreditation or candidate status. By the end of May this will include approximately fifteen (15) trust anchors. Other profiles will be defined and made operational.

Scope Area Four, Federation Agreement among Accredited HISPs:

Proposed scope per ONC Award Letter: Develop and implement a federated agreement among accredited HISPs that avoids the need for one to one legal agreements among HISPs.

Timeline: DirectTrust accredited HISPs are participating in federated agreement by May, 2013.

The current Federation Agreement has been signed by eight (8) HISPs, and is effectively a proxy for accreditation during this “transitional” period of the EHNAC-DirectTrust DTAAP roll out.

Agreed work to be completed for Scope Area Four:

- Determine the scope and contents of a potential permanent Federation Agreement, beginning in May, 2013 to be completed with recommendations by the end of 2013. The current Federation Agreement is expected to be in continuous use for the duration of 2013.
- Draft and obtain legal review of permanent Federation Agreement, and circulate to relevant stakeholders within the Direct community.