



DirectTrust.org

HISP Accreditation Guidelines

Version 1.3

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General Overview of the Accreditation Process

By successfully completing the DirectTrust HISP Accreditation Program, organizations can efficiently implement best practices, improve performance and comply with industry legislative mandates and standards for interoperability using Direct Exchange.

This guideline provides an overview of the accreditation process and answer questions you may have on becoming accredited.

Both first time applicants and re-accreditation applicants will follow the same process for achieving accreditation.

Application Process

Organizations interested in applying for HISP Accreditation must complete the application on the accreditation.directtrust.org website.

The HISP Accreditation Program Agreement document must be signed by the applicant and submitted via email to apadmin@directtrust.org.

Summary of the Accreditation Process

Step 1: Getting Started

- Each Applicant HISP starts the Accreditation and re-accreditation process by completing and submitting an online Application Form, the Application Agreement and pays the Accreditation Fee.

Step 2: Login and Download Self Attestation Document

- After the Application materials have been received and processed by DirectTrust, the Applicant HISP will securely receive a User Id and Password to access the Accreditation Program Applicant web site to start the Accreditation Process. Once logged in, the HISP may download the Self Attestation Document and the Companion Guide.

Step 3: HISP Completes Self Attestation Document

- After completing the Self Attestation questions and collecting the Evidence to attest to its compliance, the HISP will upload the documents via the Accreditation web site.

Step 4: DirectTrust Review of Self Attestation Document and Evidence.

- After submission of the Self Attestation Document and Evidence, the DirectTrust Reviewer will review the submission for completeness and to ensure that the HISP is operating within the HISP Community Policy guidelines. After the review is completed and the HISP successfully passes the Self Attestation review it will be asked to upload proof of receiving its HIPAA Privacy and Security Certification or Accreditation. **Note: the HIPAA Privacy and Security Certification or Accreditation may be uploaded as soon as the Applicant HISP receives it and is a requirement to receive HISP Accreditation.**

Step 5: DirectTrust HISP Accreditation Approval

- Upon successful review by the Reviewer, DirectTrust will grant Accreditation to the HISP. Once the accreditation has been granted, the Accreditation website will be updated to indicate its accreditation status and notification will be sent to the HISP as proof of its accreditation.

Re-Accreditation

Occurs every two years from the date the applicant is accredited and follows the same process as a first time HISP Accreditation. See the Accreditation Process above.

Approved HIPAA Privacy and Security Vendors

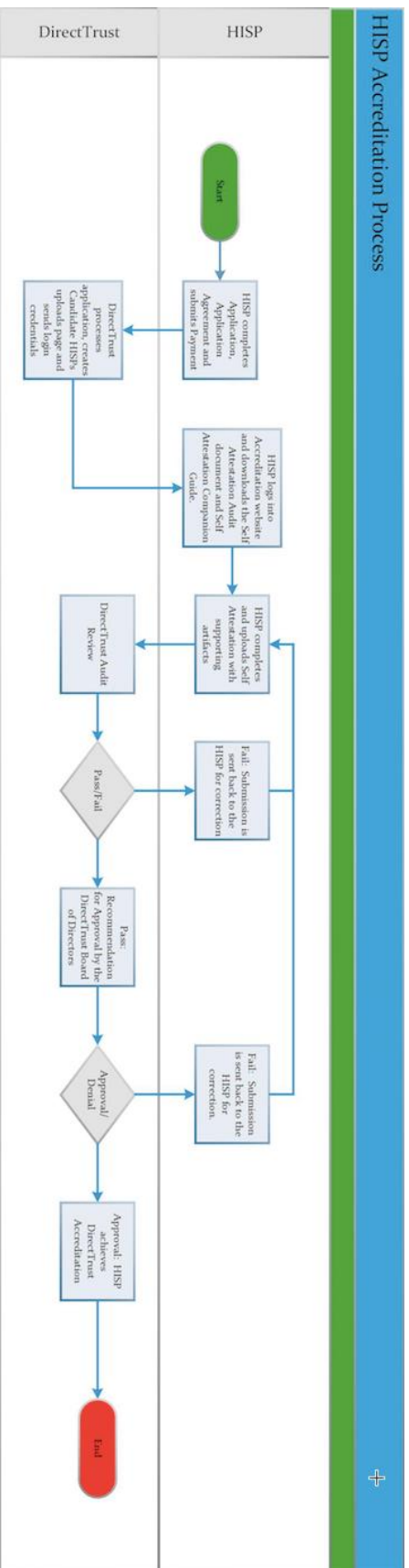
DirectTrust will accept HIPAA Privacy and Security Certification or Accreditation from the following approved vendors:

EHNAC - Electronic Healthcare Network Accreditation Commission

HITRUST* - Health Information Trust Alliance

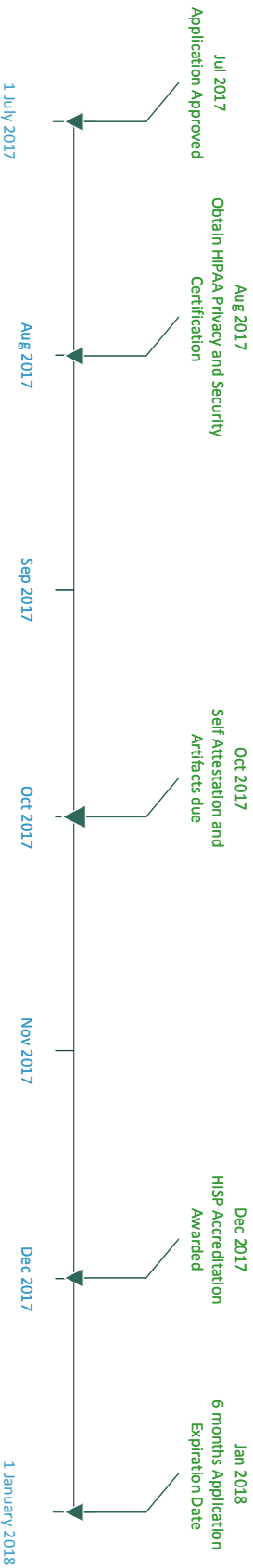
***Note:** Note: For those HISP Applicants that choose HITRUST, please contact DirectTrust to discuss the HITRUST CSF Tool Scope settings in the CSF Tool. For version 8.1 of the CSF Tool, HISP Applicants **MUST** select both Privacy and Security. For version 9.0 and later, HISP Applicants at a minimum, **MUST** select Privacy and Security and include in the Regulatory Factor setting: EHNAC Accreditation.

Sample HISP Accreditation Process



Sample HISP Accreditation Timeline

First Time Applicant



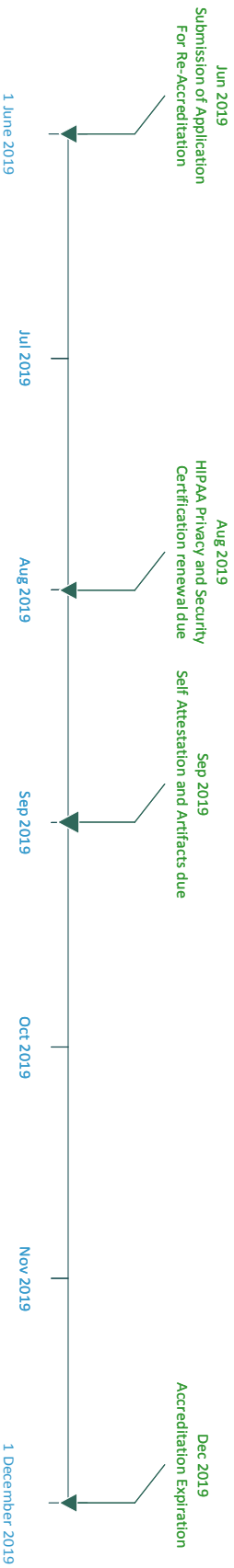
If Accreditation is awarded on 12/1/2017 this becomes the HISP Accreditation Date.

Accreditation Fee is due on the anniversary of the Accreditation date (every two years)

The HISP Accreditation expiration date would be 12/1/2019

Next Self-Attestation would be due on or before 09/1/2019

Re-Accreditation



Note: The Self-Attestation is due 3 months prior to the HISP's Accreditation Expiration date. Additionally, proof of HIPAA Privacy and Security Certification or Accreditation renewal is required in August 2019 to maintain active DirectTrust Accreditation Status.



Accreditation Fees

DirectTrust charges fees to cover the operating expense of the HISP Accreditation Program.

DirectTrust is charging the same fee for all HISPs regardless of a HISP's size as the work required for the Accreditation Review is the same for all HISPs.

Please note: this fee only covers the DirectTrust Accreditation Program Fee; additional fees are charged by the vendor that provides your HIPAA Privacy and Security Certification. Please discuss this fee with your HIPAA Privacy and Security Certification vendor.

For 2018, the HISP Accreditation Fee is: \$4,500.00.

This fee includes 20 Hours of work to review the HISP Accreditation Self Attestation Materials. The 20 Hours is ample time to complete the review.

During 2018, in the event that an Applicant HISP requires more than 20 Hours of effort due to: a HISP having to re-submit self-attestation materials, requires help in completing the Self Attestation materials or creates delays attributable to the HISP; the additional time will be billed at **\$175.00 per hour**.

Submission Requirements

Applicant organizations must submit the:

1. Accreditation Fee
2. Completed online HISP Accreditation Application
3. Signed HISP Accreditation Program Agreement
4. HIPAA Privacy and Security Certification or Accreditation **Note:** if the Applicant HISP has not acquired the certification at this time, it may be submitted at a later date but it must be reviewed and accepted before the HISP Accreditation can be granted

Upon receipt of the above items, DirectTrust will review the documents to determine if the Application is accepted by DirectTrust for accreditation processing.

Application acceptance

The HISP Accreditation Program Self Attestation Questionnaire response **MUST** be submitted within three (3) months of the application approval process in order to allow DirectTrust adequate time to review the Applicant HISP's submission.

When the applicant completes the application process, the applicant is awarded Applicant Status. HISPs can submit the DirectTrust HISP Accreditation application at anytime, but submission of artifacts and evidence for the Self-Attestation Questionnaire must be current. Therefore, DirectTrust will not accept the submission of the Self Attestation Questionnaire and supporting evidence any earlier than six months prior to the HISP Accreditation valid until date.

Note: The Accreditation Fee is not refunded if the Applicant withdraws from the accreditation program, or does not achieve accreditation.

The DirectTrust Self Attestation Questionnaire and Companion Guide will be made available to the Applicant HISP. The Self Attestation Questionnaire contains all of the criteria questions that a HISP must provide answers to and in some cases, provide Evidence to demonstrate that it is in compliance with the DirectTrust HISP Community Policy. The Companion Guide provides guidance and an explanation for how to respond to each of the criteria questions outlined in the Self Attestation Questionnaire. **NOTE: It is *strongly recommended* that the HISP download and review the Companion Guide before completing the Self Attestation requirement questions.**

After the HISP uploads their responses to the Self Attestation questionnaire with the accompanying Evidence, the DirectTrust Reviewer will review them for completeness and to ensure that the HISP is operating within the DirectTrust HISP Community Policy. Additionally, the DirectTrust Reviewer will confirm that the Applicant holds a valid and in force HIPAA Security & Privacy Certification.

Following the Reviewer's recommendation for approval, DirectTrust will examine the Accreditation materials and decide if the accreditation should be granted or denied.

Once DirectTrust grants the HISP Accreditation, the DirectTrust website will be updated to indicate its accreditation status and notification will be sent to the HISP as proof of its accreditation.

Late & Incomplete Submissions

The complete Self-Attestation and required artifacts MUST be submitted three (3) months prior to expiration. This allows time for review, revisions, and appeal. This also prevents a gap in the accreditation or re-accreditation process. For Re-Accreditations, the Self Attestation CANNOT be submitted prior to 6 months of the expiration date.

For 2018, HISP Accreditation Late Fees are assessed each month at: \$900.00/month. Please note: Late Fees are cumulative.

Late Fee Amount	Timeline	Description of Missed Deadline
\$900.00	90 Days prior to Valid Until Date	HISP has not submitted HISP Accreditation Application Packet and/or uploaded Self-Attestation Questionnaire and Evidence
\$900.00 monthly	60 days prior to valid until date, additional fee will be charged monthly until HISP Accreditation is complete.	HISP has not submitted HISP Accreditation Application Packet, uploaded Self-Attestation Questionnaire and Evidence, and/or HIPAA Privacy and Security Certification/Accreditation

The DirectTrust Accreditation Program Team Administrator will be in contact with the Applicant HISP a minimum of six (6) months prior to HISP Re-Accreditation valid until date. If a new HISP applies for HISP accreditation, the DirectTrust Team Administrator will contact the HISP a minimum of three (3) business days from the date the application is received. The expectation is for the HISP Accreditation Self-Attestation and related Evidence to be uploaded to the HISP's secure account 90 Days prior to HISP valid until date or 90 days from the application date for new applicants.

For those HISPs that are being re-accredited, if the completed Self Attestation and Evidence is not submitted, a minimum of 90 Days prior to the HISP valid until date (application date for new applicants), late fees will apply.

The purpose of the 90 Day timelines is to give ample time for the DirectTrust Reviewer to examine the HISP's Self Attestation and Evidence. Upon review, if the HISP needs to resubmit documentation or provide additional Evidence to the reviewer, the 90 Day window permits time for resubmission prior to the HISP's valid until date. The primary goal of the DirectTrust Accreditation Program Administration Team is to partner with the HISP to ensure the HISP accreditation remains valid at all times.

If the Applicant HISP does not submit the Self Attestation response and associated Evidence within the 90 Day period, the submission will be determined late. Late Fees will be paid to DirectTrust within fifteen (15) calendar days of not meeting timeline milestone events outlined below.

1.	Application Fee is not paid	180 days prior to HISP Accreditation valid until date, an invoice is sent to the HISP. If the accreditation fee is not paid 90 days prior to expiration, a late fee charge of \$900.00 will be applied to the HISP. Late Fee payment and application fee will be paid within fifteen (15) calendar of notification from DirectTrust Accreditation Team.
2.	Self-Attestation Documentation is NOT submitted by the due date (3 months before valid until date) but submitted before accreditation valid until date.	90 Days prior to the HISP's valid until date a late fee of \$900.00 will be charged to the HISP. HISP's will be charged a late fee of \$900.00 per month for each additional 30 days, until the Self-Attestation response is received. Late Fee payment will be paid within fifteen (15) calendar of notification from the DirectTrust Accreditation Team.
3.	Accreditation Expires – HISP has not been responsive to emails, phone calls, or certified letters.	In order to remain in the DirectTrust Trust Anchor Bundle(s), a HISP's Accreditation must be current and valid. If a HISP's Accreditation expires, at its sole discretion, the DirectTrust may choose to grant a 30-day grace period extension to the HISP's Accreditation valid until accreditation date. The DirectTrust Board of Directors may also decide at its sole discretion to remove the HISP's Trust Anchors from any Trust Anchor Bundles they are in as soon as the Accreditation expires. Once a HISP is removed from the Trust Bundle(s), the HISP will start the accreditation process over from the beginning including the submission of the Accreditation Fee and any accrued late fees in the amount of \$900 per month.

4.	A HISP seeking Accreditation completes the Accreditation Application and submits the application fees as well as the HISP Agreement but does not submit the Self Attestation Questionnaire/Evidence and/or a HIPAA Privacy and Security Certification or Accreditation.	The HISP will forfeit the application fee if the Self Attestation Documentation and/or Privacy and Security Certificate is not received prior to the HISP valid until date. At its sole discretion, DirectTrust may choose to grant a 30-day grace period extension to the HISP's Accreditation valid until date. The DirectTrust Board of Directors may also decide at its sole discretion to remove the HISP's Trust Anchors from any Trust Anchor Bundles they are in as soon as the Accreditation expires. Once a HISP is removed from a Trust Anchor Bundle(s), the HISP will start the accreditation process over from the beginning including the submission of the Accreditation Fee and any accrued late fees in the amount of \$900 per month.
5.	A new HISP applying for accreditation does not submit the Self Attestation Documentation 90 Days after the HISP Accreditation Program Application is processed by the DirectTrust Accreditation Team. (DirectTrust can grant a 30-Day grace period if a request is submitted in writing prior to the 90 Day window.)	The HISP must reapply for accreditation and resubmit the application payment.

Appeal Policy

The appeal process is for those organizations that have been denied HISP Accreditation by DirectTrust.

Appeal Process

Organizations are required to follow the process outlined below if they disagree with DirectTrust's determination of the accreditation status. The submission of the required appeal materials must be received by DirectTrust within two weeks of the notification their Accreditation being denied.

- 1) Submit a written appeal to the DirectTrust President and CEO documenting the rationale and include; documentation of the actions taken to remediate identified issues; provide a chronology of dates of submission against all delivery dates including email correspondence documentation; provide all documentation provided to DirectTrust; and provide any other pertinent information or extenuating circumstances;
- 2) The DirectTrust President and CEO will review appeal requests and make an initial determination whether the appeal should be forwarded to the DirectTrust Executive Committee for consideration. The determination of the referral to the Executive Committee is at the sole discretion of the DirectTrust President and CEO. The President and CEO will make the determination whether other organizations need to be consulted which could elongate the timeline for any determination. The timeline for such determination starts within 2 weeks of the receipt of the written appeal provided that all of the pertinent information has been supplied for the review (unless other entities need to be consulted which may elongate this timeline).
- 3) If the DirectTrust President and CEO decides to refer the matter to the Executive Committee, a full report and accompanying documentation will be provided within 4 weeks of such request. Timeline for a final determination by the Executive Committee will be made within 4 weeks of the DirectTrust President and CEO making such request.

Appendix A Document Version Control

Note: This section is for internal use by DirectTrust only.

Document Version	Document Date	Version Notes
1.0	5/23/2017	Initial Stephen Weiss, AP Task Force
1.1	7/3/2017	Task Force Edits
1.2	7/11/2017	SW Edits for approved HIPAA P&S Vendors
1.3	2/7/2018	Update Fees and other Policy language, SW,KG,SP