

# State of Nebraska Health Information Exchange Health Insurance Plan Data Standards Policy

<b>Policy:</b> State of Nebraska Health Information Exchange Health Insurance Plan Data Standards Policy	<b>Accountability:</b> Systems Support Manager / CyncHealth Staff / Vendors:	
<b>Effective Date:</b> 12/21/2021	<b>Review Date:</b> 12/12/2024	<b>Referenced Procedures:</b>
<b>Intended Audience:</b> All CyncHealth staff and vendors working on behalf of CyncHealth. CyncHealth Participants.		
<b>Approval:</b> 12/21/2021 12/15/2022 3/27/2025		
<b>Title:</b> Health Information Technology Board		

## STATEMENT

In accordance with the standards set forth under the Health Insurance Portability and Accountability Act (“HIPAA”) as well as federal and state statutory and regulatory requirements (hereafter referred to as “Regulatory Requirements”), CyncHealth is committed to ensuring the confidentiality, integrity, and availability of protected health information and electronic protected health information (PHI/ePHI), as well as any sensitive and confidential data it creates, receives, maintains, and/or transmits. For the purposes of this policy, PHI, ePHI and sensitive and confidential data shall be referred to herein as “Covered Information.”

## DEFINITIONS

- **Electronic Protected Health Information (ePHI):** Information that is “individually identifiable health information” and is created, received, maintained, or transmitted in any electronic form or medium.
- **Health Information Technology Board (HIT Board):** A seventeen-member board of healthcare professionals appointed by the Governor of Nebraska to oversee the State of Nebraska Health Information Exchange and the State of Nebraska Prescription Drug Monitoring Program (PDMP).
- **Protected Health Information (PHI):** Information that is “individually identifiable health information” and is created, received, maintained, or transmitted in any form or medium.

- **Secure File Transfer Protocol (SFTP):** A network protocol that provides file access, file transfer, and file management over a reliable data stream.
- **Social Care Data:** Data involving conditions in the places where people live, learn, work, and play that affect a wide range of health and quality of life risks and outcomes. Social Care Data should include factors like socioeconomic status, education, neighborhood and physical environment, employment, and social support networks, as well as access to health care. Data sharing of Social Care Data must include all available information including, but not limited to, date of referral, service type (food, housing, utility, transportation, etc.), agency that met that referral, and the outcome of referral with both closed-loop and directory type data.
- **X12 835 and 837 Files:** Electronic file formats widely used for electronic submission of health data claims and payment information.
- **X12 835 Sets:** Electronic transaction sets that can be used to make a payment, send an Explanation of Benefits (EOB) remittance advice, or make a payment and send an EOB remittance advice only from a health insurer to a health care provider either directly or via a financial institution.
- **X12 837 Sets:** Electronic transaction sets that can be used to submit health care claim billing information, encounter information, or both, from providers of health care services to health insurance plans, either directly or via intermediary billers and claims clearinghouses. It can also be used to transmit health care claims and billing payment information between health insurance plans with different payment responsibilities where coordination of benefits is required or between health insurance plans and regulatory agencies to monitor the rendering, billing, and/or payment of health care services within a specific healthcare/insurance industry segment.

## REFERENCES

- **Health Insurance Portability and Accountability Act of 1996, Public Law 104-191 (“HIPAA”)**
- **Neb. Rev. Stat. § 81-6,125, Population Health Information Act**
- **Medical Assistance Act 68-901 to 68-9,111**
- **CyncHealth Transmission Protection Policy**

## PURPOSE

The purpose of this policy is to document the responsibility of health insurance plans defined in Neb. Rev. Stat. § 81-6,125 and Medicaid Managed Care Organizations to share data with the designated health information exchange as determined by this policy adopted by the Health Information Technology Board. The objective is to provide clarity of definitions and responsibilities surrounding the provided health insurance plan data and data interoperability.

## SCOPE AND APPLICABILITY

This policy covers the sharing of health information data with the Nebraska Health Information Exchange that is overseen by the State of Nebraska HIT Board as required by the Population Health Information Act.

## ROLES AND RESPONSIBILITIES

The State of Nebraska HIT Board with the support of CyncHealth Chief Legal Counsel will be responsible for the enforcement, interpretation, management, review, and education of this policy. Likewise, CyncHealth staff will be responsible for acknowledgement and adherence to this policy.

## POLICY

All health insurance plans named in Neb. Rev. Stat. § 81-6,125 shall report to CyncHealth 835 and 837 files in accordance with this Policy. In addition to 835 and 837 files, Nebraska Medicaid Managed Care Organizations shall share Social Care Data, as defined by this Policy, with the designated statewide HIE, CyncHealth.

### Health Insurance Plan Data Format

All health insurance plans defined in Neb. Rev. Stat. §81-6,125 shall share X12 835 and 837 files with CyncHealth. CyncHealth will ensure all Health insurance plan data received is in X12 835 and 837 file formatting for the purposes of data interoperability, quality, and matching.

All Nebraska Medicaid Managed Care Organizations shall report Social Care Data according to the Social Determinants of Health Data Submission Specifications and applicable health insurance plan to support data interoperability, care coordination, quality, and matching.

### Health Insurance Plan Data Flow

Health insurance plans will be required to submit data through an encrypted connection into CyncHealth’s internal cloud environment. Health insurance plan data, including both the roster files and claims files, will be securely transmitted to the SFTP Server and managed according to the CyncHealth Transmission Protection Policy<sup>1</sup> and data sharing agreements.

## COMPLIANCE

CyncHealth staff will be required to comply with all information security policies and procedures as a condition of employment or contract with CyncHealth. CyncHealth staff who fail to abide by the requirements outlined in the State of Nebraska Health Information Exchange Health Insurance Plan Data Standards Policy will be subject to disciplinary action up to and including termination of employment or contract.

## ANNUAL REVIEW

<b>Date:</b>	<b>Reviewed By:</b>	<b>Comments/Updates:</b>
12/15/22	HIT Board	Amended - Updates to include MCO social care data, requirements for payor shared files.
12/21/24	HIT Board – Policy Review Committee	Updates to the policy words, references

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<sup>1</sup> Available upon request (support@cynchealth.org)