

<h1>P3N Policy #2</h1> <h2>Documentation Change Management</h2> <h3>PA eHealth Partnership Program</h3>	
Subject: P3N Documentation Change Management Policy	Version: v.4b
Status: Effective January 1, 2024	Creator: Kay Shaffer
Approval Date: October 4, 2023	Contact: Kay Shaffer (kashaffer@pa.gov)
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Related Documents:	-Terms and Definitions -Pennsylvania eHealth Partnership Program Uniform Participant Agreement v.4c

1. **PURPOSE.** This document establishes the policies and process to be used for any changes to the Documentation relative to the Pennsylvania Patient and Provider Network (P3N) Certification Package, which includes the Pennsylvania eHealth Partnership Program Uniform Participant Agreement (PAR), P3N Technical Requirements, P3N Application for Participation and P3N Policies.
2. **SCOPE.** This document applies to the Pennsylvania Department of Human Services eHealth Partnership (PA eHealth) and all Certified Participants (CPs) connected to the P3N.
 - 2.1. This policy is intended to be consistent with and does not replace or supersede any federal regulations or laws (such as Health Insurance Portability and Accountability Act (HIPAA) and Health Information Technology for Economic and Clinical Health Act (HITECH) or state privacy and security laws and regulations.
3. **OBJECTIVES.** The objective of this policy is to:
 - 3.1. Define the process to be used for changes to any Documentation related to the P3N Certification Package, including:
 - 3.1.1. P3N Application for Participation
 - 3.1.2. P3N Participation Agreement
 - 3.1.3. P3N Technical Requirements
 - 3.1.4. P3N Policies
 - 3.2. Define the approval process to be used for documents contained in the P3N Certification Package.

4. **POLICY**

4.1. **Ownership of Documents**

- 4.1.1. PA eHealth is responsible for all documents in the Participation Agreement. Modifications will be made within the terms of PA eHealth change management policies.
- 4.1.2. All documents, once approved for use, will be maintained by PA eHealth on the DHS webpages for PA eHealth at dhs.pa.gov.

4.2. **Change Management Process**

- 4.2.1. For purposes of this document, the use of “changes” and “revisions” will include proposed new, amended, repealed or replaced language.
- 4.2.2. Changes to, or questions regarding, Documentation (this includes the PAR, P3N Application for Participation, P3N Technical Requirements, and the P3N Policies) shall be recommended by PA eHealth per the provisions of this Section 4.2. Changes may also be required due to changes in state or federal law, regulations or requirements.
- 4.2.3. If PA eHealth recommends a revision to a document:
 - 4.2.3.1. PA eHealth will draft a new document or a new document version noting the revision or recommended changes, and providing draft language if and as appropriate to CPs and Provisional CPs.
 - 4.2.3.2. The document will be circulated to the CPs for a comment period thirty (30) Days (if appropriate) for review and feedback.
 - 4.2.3.3. Draft versions will have a review period, unless the change results from a change to state or federal law or regulations that must be implemented in a shorter timeframe.
 - 4.2.3.4. If necessary, an advisory workgroup may be convened to draft and review the document. This workgroup will consist of PA eHealth staff, and invited participants from each CP and Provisional CPs. This group will be tasked with review of feedback on revisions and advising on whether to recommend the document for approval.
 - 4.2.3.5. If recommended changes require implementation efforts on the part of CPs, provisional CPs and/or PA eHealth, an implementation timeframe will be determined by PA eHealth as part of the review and feedback process.
- 4.2.4. If an advisory workgroup is convened and recommends against proceeding with the document:

4.2.4.1. The advisory workgroup will draft a response outlining the reasons for rejection. This response will be circulated to the CPs and PA eHealth.

4.2.5. DHS has the final word on acceptance of revisions. DHS will, however, work in good faith and collaboration with the HIETCC.

4.3. Document Approval Process

4.3.1. Upon completion of the review and revision process, PA eHealth will circulate the final draft document to all CPs and Provisional CPs for final review.

4.3.2. The final document will be confirmed, taking into account the advice of CPs and Provisional CPs.

4.3.3. Any disputes arising during this Change Management Process will be handled using the Dispute Resolution Process included in the PAR.

4.3.4. Upon approval of the final document, PA eHealth will schedule an overview and educational session as appropriate.

4.3.5. Upon final approval, PA eHealth will post the document to the DHS website or otherwise make available for use.

4.3.6. The effective date of the document shall be set forth in the document itself.