



Subject: Policy for Maintaining Policies and Procedures, Policy Index and Definitions			Policy #: 1
Status: Approved		Approved/Authorized By: NATE Board of Directors	
Date Approved: 1/23/2015	Effective Date: 11/24/2014	Version: 1.5	Pages: 6

I. Purpose

The National Association for Trusted Exchange (NATE) Board of Directors has responsibility for developing, maintaining, repealing, amending and retaining the Policies and Procedures of the National Association for Trusted Exchange. The purpose of this document is to define the policies for development, submission, review, approval and retention of NATE policies, procedures and related documents, to serve as an index of those documents and to provide a common set of definitions for all NATE policies and procedures.

II. Applicability of Policies

This policy applies to all Members and their responsibilities concerning NATE policies and procedures.

III. Policy

a. Development

All NATE documents will use the appropriate template and be assigned numbers according to the scheme listed below. For example, this policy will be listed as “Policy #: 1”. The NATE Policy Template will be listed as “Template #: 1.a”. The policy for the Provider to Provider for Treatment trust profile will be listed as “Policy #: 3.c.1”

b. Submission

Any Member may submit in writing to the Board of Directors a request for the development of a new policy or procedure, or a request for the amendment or repeal of an existing policy or procedure. Any Member of the Board of Directors may also bring forth any concern or question regarding NATE policies or procedures. All such requests shall identify (i) the policy and/or procedure that is the subject of the requested change (if any), (ii) the type of policy or procedure sought if it is a request to develop a new policy or procedure, (iii) a thorough description of why the request is necessary, and (iv) an analysis of the expected impact of adopting the new policy or procedure or modifying/repealing an existing NATE policy or procedure.

c. Review

The Board of Directors will consider any requests that meet the submission criteria set forth above at its next regularly scheduled meeting following receipt of such request or at a time to be scheduled and communicated to the Members. If, after considering the request, the Board of Directors determines that the request does not have merit or lacks sufficient detail, it will communicate this determination to the requestor.

d. Approval

- i.** Policies will be considered approved when ratified by the majority of Members.
- ii.** Procedures that do not impact NATE operations will be considered approved when approved by the NATE CEO.
- iii.** Procedures that impact NATE operations will be considered approved when approved by the NATE Board of Directors.
- iv.** Templates will be approved by the Policy and Procedure Committee.
- v.** The Policy and Procedure index (Appendix A:) will be approved by the Policy and Procedure Committee.
- vi.** The Definitions (Appendix B:) will be approved by the Policy and Procedure Committee.

e. Retention

All NATE Policies and Procedures shall be maintained in an electronic form that can be accessed and printed if desired. Members shall make copies of the NATE Policies and Procedures available in a location that is accessible to all stakeholders.

All current NATE Policies and Procedures as well as originals of all amended, repealed and replaced NATE Policies and Procedures shall be maintained for the duration of their usefulness as determined by the NATE Board of Directors.

IV. References

- a. NATE Bylaws**
- b. NATE Policy Template**
- c. NATE Procedure Template**

V. Related Procedures

- a. NATE Procedure #1.a – NATE Procedure for Policy and Procedure Change**

VI. Version History

	Date	Author	Comment
1	10/29/2013	Paul Cartland	Approved Version
1.1	10/15/2014	Paul Cartland	Changes to reflect revised bylaws and membership types
1.2	11/7/2014	Paul Cartland	Additional changes to reflect bylaws.
1.3	11/13/2014	Paul Cartland	Replaced membership templates with membership application
1.4	11/24/2014	Paul Cartland	Update to reflect approval by the board
1.5	1/23/2015	Aaron Seib	Update to reflect approval by board in relation to NBB4C approvals.

Appendix A: Index of Policies and Procedures

Note, the * symbol indicates actual policy or procedure documents.

1. Policy and Procedure for maintaining policies and procedures*
 - a. Procedure for maintaining policies and procedures
 1. NATE Policy Template*
 2. NATE Procedure Template*
2. Policies and Procedures for NATE Organization
 - a. Policies for NATE Organization
 1. Policy for New Members*
 2. Policy for Communications*
 3. Policy for Board of Directors Nominations and Elections*
 - b. Procedures for NATE Operations
 1. Procedure for New Member Onboarding*
 - a. MOU *
 - b. New Member Application
 - c.
 2. Procedure for Communications Approval*
 3. Procedure to Change Member Representative*
 4. Procedure for Board of Directors Nominations and Elections*
3. Policies and Procedures for Trust Operations
 - a. General Policies for Trust Operations
 1. Policy for each State to have a Procedure for Onboarding NATE-Qualified Entities to a Profile*
 - a. Onboarding Guidance Template*
 2. Policy for Multi-state HISP's and HIO's*
 3. Policy for Migrating Profile Policy Changes*
 4. Policy for developing new Profiles*
 - b. General Procedures for Trust Operations
 1. Procedure for piloting new Profiles*
 - c. Policies for Trust Profiles using Direct*
 1. Policy for Provider to Provider for Treatment Trust Profile (P2P4Tx)*
 2. Policy for Provider to Provider for Treatment HISP Level Cert Trust Profile*
 3. Policy for NATE's Blue Button for Consumers (NBB4c)
 - d. Procedure for Trust Profiles
 1. Procedure for Onboarding to a Trust Profile
 - a. NBB4C Onboarding Application
 - e. Policies for Directory Services
 1. Policy for Provider to Provider for Treatment Directory Search Trust Profile*

- f. Procedures for Directory Services
 - 1. Procedure for Onboarding to Provider Directory*

Appendix B: Definitions

Authorized End User: An individual with a Direct address who is subject to the policies of the Participant Organization.

Board of Directors: the governance entity established by the NATE bylaws.

CA: An entity providing NATE Trust Certificates.

Evaluation Authority: The entity or entities authorized to promote a NATE QE to a given Trust Bundle. The Trust Coordinator is only permitted to act on request from the appropriate Evaluation Authority when making changes to a Trust Bundle. See the specific Trust Bundle policy to determine who has been approved as the Evaluation Authority by the NATE Board of Directors for a given Trust Profile.

May: An optional policy or procedure that is truly discretionary.

Member State: Any state or territory of the United States that has completed the Member State onboarding process as defined by the approved NATE Policies and Procedures.

Member State Representative: The representative of a member state as designated by the Member State in the NATE Member State Application.

NATE Trust Certificate: An X.509 digital certificate associated with a NATE QE and used to establish the chain of trust for all X.509 digital certificates tied to (1) Direct domain names for organizations and/or (2) individual Direct addresses served by the NATE QE, as described in the Applicability Statement for Secure Health Transport. Some NATE-QEs may have more than one line of business with Certificates specific to each line of business. This term refers to the Certificate specific to the LOB for which the onboarding process was completed by the Evaluation Authority.

NATE-QE: An entity that has been vetted by the Evaluation Authority and found to satisfy all of the requirements for policies and processes of the NATE Trust Community for a specific Trust Profile.

Participant Organization: An entity that has executed an agreement with a NATE-QE for the purpose of exchanging health information using Direct project specifications.

RA: An entity registering Participant Organizations and/or Authorized End Users including identity verification of same.

Shall: An absolute requirement of the policy or procedure.

Should: A recommended course for a policy or procedure. There may exist valid reasons in

particular circumstances to ignore a particular policy or procedure, but the full implications must be understood and carefully weighed before choosing a different course.

Task Group: Working groups of people that are tasked with evaluating requests for new or changes to existing Policies and Procedures whose deliverable are a recommendation for consideration by the NATE Board of Directors. Individuals working as part of a Task Group do not have to be representatives selected by the members of NATE but are individuals selected by said representatives based on their qualifications to support the needs of the NATE Board of Directors.

Trust Bundle Coordinator: The role responsible for executing the technical steps and related testing pre-requisite to a NATE-QE being added to a Trust Bundle or subsequently removed.

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