



Subject: NATE Procedure for Onboarding to a Trust Profile			Procedure #: 3.d.1
Status: Approved		Approved/Authorized By:	
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I. Purpose

This Procedure defines the process for administering the NATE Trust Bundles that define membership in the NATE Trust Community and conformance to NATE Trust Profiles.

II. Responsibilities

A. Evaluation Authority:

- Inform the Trust Bundle Coordinator when an organization has been determined to meet all requirements of a NATE Trust Profile and request that they be added to the appropriate NATE Trust Bundle.

B. Trust Bundle Coordinator

- Maintain and publish all NATE Trust Bundles.
- Add new NATE-Qualified Entities (NATE-QEs) to the NATE Trust Bundles corresponding to the appropriate NATE Trust Profile when requested by the Evaluation Authority.
- Remove organizations from a NATE Trust Bundle when requested by the Evaluation Authority.
- Inform all NATE-QEs and corresponding Evaluation Authority of changes to a NATE Trust Bundle.

C. NATE-QE

- Work with the Trust Bundle Coordinator to incorporate the NATE Trust Certificate in the appropriate NATE Trust Bundle(s).
- Complete testing.
- Install or update NATE Trust Bundles, as appropriate, when alerted of updates by the Trust Bundle Coordinator.

III. Procedure

This procedure comprises two parts:

1. The procedure for adding a new NATE-QE to a NATE Trust Bundle, and
2. The procedure for removing a NATE-QE from a NATE Trust Bundle.

A NATE Trust Bundle comprises the technical component of membership in the NATE Trust Community for a specific NATE Trust Profile. Therefore, the procedures for adding members to and removing members from a NATE Trust Profile equates to the procedures for adding NATE Trust Certificates to and removing NATE Trust Certificates from a NATE Trust Bundle.

A. Adding a NATE-QE to a Trust Profile

Precondition: A candidate NATE-QE has made application to the Evaluation Authority to be added to a NATE Trust Profile.

Post-condition: The new NATE-QE has been added to the appropriate NATE Trust Bundle.

1. The Evaluation Authority determines that a candidate NATE-QE has met the policy and process requirements for a NATE Trust Profile and that its NATE Trust Certificate should be added to the corresponding NATE Trust Bundle.

Rationale – The Evaluation Authority has the sole authority to determine whether a candidate NATE-QE meets the policy and process requirements of a NATE Trust Profile.

2. The Evaluation Authority identifies a single trust bundle point of contact (POC) within the candidate NATE-QE for all communications regarding Trust Bundle management, along with an email address that is regularly monitored by that POC.

Rationale – Notification of changes to each NATE Trust Bundle will be communicated through email. The name and contact information of the POC, including an email address, should be collected by the Evaluation Authority as part of the application process of a candidate NATE-QE.

3. The Evaluation Authority identifies a single testing POC within the candidate NATE-QE for testing, along with an email address that is regularly monitored by that POC.

Rationale – Each candidate NATE-QE is required to test with other NATE-QEs. The name and contact information of the POC, including an email address, should be collected by the Evaluation Authority as part of the application process of a candidate NATE-QE.

4. The Evaluation Authority contacts the Trust Bundle Coordinator by email instructing the Coordinator to add the new NATE-QE to the appropriate Trust Bundle, providing the contact information of the trust bundle and testing POCs.

Rationale – It is desirable for NATE to define a single point of contact – the Trust Bundle Coordinator – to manage the technical processes of Trust Bundle Administration.

5. The Trust Bundle Coordinator contacts the trust bundle POC of the new NATE-QE via email requesting that the NATE Trust Certificate be provided by return email. If the organization maintains a staging/testing system as well as a production system, NATE Trust Certificates are requested for both.

Rationale – The presence of an organization’s NATE Trust Certificate in a Trust Bundle is the sole technical indication of a NATE-QE’s membership in the NATE Trust Community and conformance with the policies and procedures of a NATE Trust Profile. Technical testing with other NATE-QEs will be accomplished using a staging Trust Bundle.

Noteworthy: Since the NATE Trust Certificate is a public key, strong security is not required to transport it.

6. Each NATE Trust Certificate is inspected by the Trust Bundle Coordinator to verify conformance with requirements identified in NATE policies, if any. If defects are identified, the Trust Bundle Coordinator contacts the Evaluation Authority to report the failure and contacts the trust bundle POC to correct the defect(s) and resubmit the NATE Trust Certificate(s).

Rationale – This may be the first technical check on meeting digital certificate requirements identified in policies and processes for a NATE Trust Profile, and issues should be reported to the Evaluation Authority. It is desirable to correct any defects before proceeding to technical testing.

Noteworthy: A defect in the NATE Trust Certificate may indicate a deviation from policy and process requirements. The Evaluation Authority should determine whether failure at this step indicates that new NATE-QE status should be revoked and this procedure should be halted.

7. The Trust Bundle Coordinator records the expiration of each NATE Trust Certificate and makes a note to remind the trust bundle POC of pending certificate expiration at least two weeks before any NATE Trust Certificate expires.

Rationale – Expired digital certificates cannot be used to enable secure exchange. Monitoring of certificate expiration should be part of standard Trust Bundle management.

Noteworthy: The NATE-QE or its vendor should likewise monitor NATE Trust Certificate expiration dates.

8. The Trust Bundle Coordinator informs the trust bundle POC of successful verification, and adds the new staging/testing NATE Trust Certificate to the NATE Staging Trust Bundle. If no staging/testing NATE Trust Certificate is provided by the new NATE-QE, the production NATE Trust Certificate is included instead.

Rationale – Policies for NATE Trust Profiles require successful testing as part of the vetting process. Further testing with other NATE-QEs is required to verify that the Trust Bundle is functional and that the new NATE-QE can interoperate with other NATE-QEs.

Noteworthy: Production systems may have access to protected health information (PHI). Each organization should consider carefully what NATE Trust Certificates are included in the NATE Staging Trust Bundle.

9. The Trust Bundle Coordinator publishes the updated NATE Staging Trust Bundle.

Noteworthy: NATE conforms to the *Implementation Guide for Direct Project Trust Bundle Distribution v1.0* for both content and transport of Trust Bundles. NATE also publishes a legacy format comprising NATE Trust Certificates in a ZIP compressed archive as an aid to organizations that have not yet implemented the standard. NATE may discontinue use of the legacy ZIP format at some future date.

10. The Trust Bundle Coordinator sends an email to the trust bundle POCs of all NATE-QEs, including the newly added organization, alerting them that the Staging Trust Bundle has been updated and testing may proceed.

Rationale – NATE has elected to create such an out-of-band mechanism of alerting NATE-QEs of Trust Bundle updates to ensure that organizations that do not automatically update NATE Trust Bundles are alerted to the need for a manual update.

11. The Trust Bundle Coordinator sends testing POC contact information for all NATE-QEs in the Staging Trust Bundle to the testing POC of new NATE-QE.

Rationale – It is the responsibility of the new NATE-QE to conduct testing before being added to a production Trust Bundle.

Noteworthy: The Trust Bundle Coordinator must maintain a list of the testing POCs for all NATE-QEs.

12. The new NATE-QE coordinates with other NATE-QEs to conduct testing with at least two NATE-QEs with vendors different than the new NATE-QE. It is the responsibility of the NATE-QE to address broad interoperability with all Trust Bundle participants.

Rationale – Testing with other NATE-QEs that use different vendors and therefore, presumably, independent implementations provides a reasonable assurance that all standards have been implemented appropriately, and that the new NATE-QE will be able to interoperate with most, if not all, other NATE-QEs.

13. The testing or trust bundle POC of the new NATE-QE contacts the Trust Bundle Coordinator via email to confirm that testing is complete.
14. If the production NATE Trust Certificate of the new NATE-QE was included in the NATE Staging Trust Bundle and the new NATE-QE wishes to have it removed, the Trust Bundle Coordinator removes it, publishes the updated Trust Bundle, and sends an email to all the trust bundle POCs of all NATE-QEs, including the newly added organization, alerting them that the Staging Trust Bundle has been updated.

Rationale – Production systems may have access to PHI. It is not desirable to continue to enable exchange between production systems and staging/testing systems that may have reduced security in place.

15. The Trust Bundle Coordinator adds the new production NATE Trust Certificate to the appropriate NATE Trust Bundle.
16. The Trust Bundle Coordinator publishes the updated NATE Trust Bundle.

Noteworthy: NATE conforms to the *Implementation Guide for Direct Project Trust Bundle Distribution v1.0* for both content and transport of Trust Bundles. NATE also publishes a legacy format comprising NATE Trust Certificates in a ZIP compressed archive as an aid to organizations that have not yet implemented the standard. NATE may discontinue use of the legacy ZIP format at some future date.

17. The Trust Bundle Coordinator sends an email to the Board of Directors and the trust bundle POCs of all NATE-QEs that are members of the NATE Trust Profile, including the newly added organization, alerting them that the NATE Trust Bundle has been updated.

Rationale – The *Implementation Guide for Direct Project Trust Bundle Distribution v1.0* does not call for any in-band or out-of-band notification of Trust Bundle changes, but instead places the responsibility for establishing the update schedule on the Trust Community member. Email will be used to contact the trust bundle POCs to ensure that all NATE-QEs update their trust stores promptly.

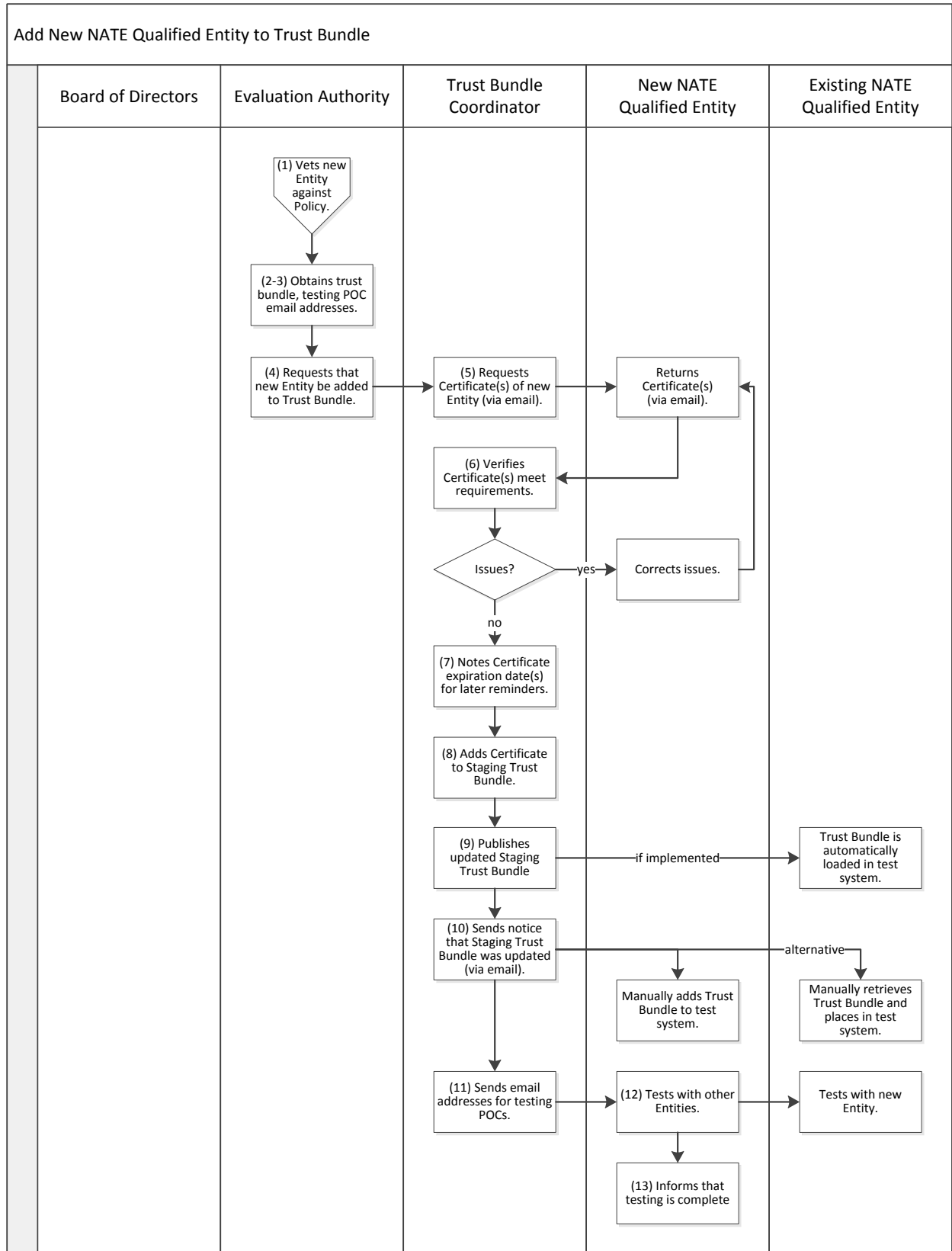
Noteworthy: The Board of Directors is alerted simply so they may monitor updates to NATE Trust Bundles. The Board of Directors might also alert the membership at its discretion.

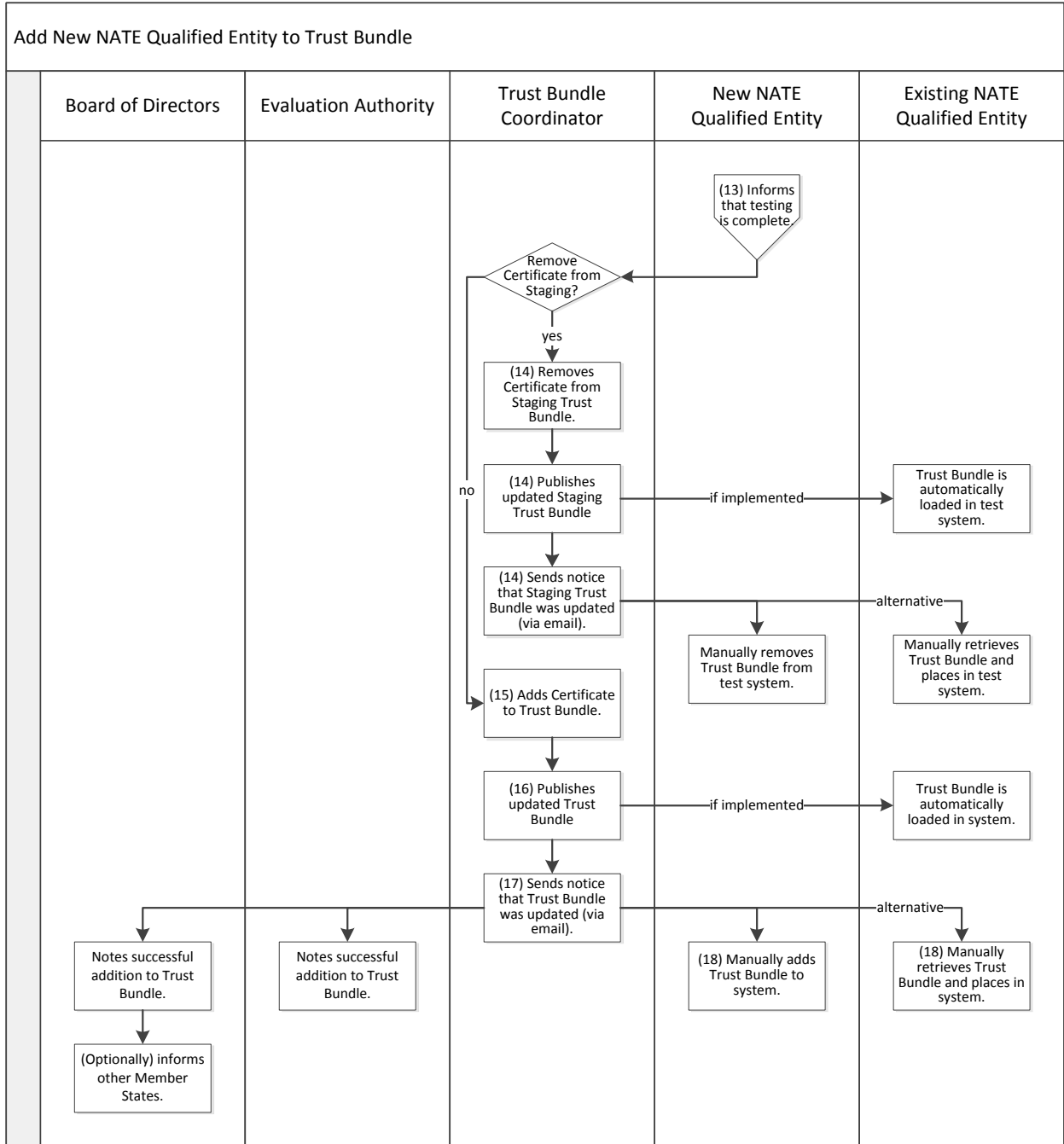
18. The trust bundle POCs of all NATE-QEs in the NATE Trust Profile download the updated Trust Bundle from the web service, and update their trust stores.

Rationale – This update adds the NATE Trust Certificate of the new NATE-QE to the local trust store of each NATE-QE, enabling trusted exchange and effectively adding the new organization to the NATE Trust Profile.

Noteworthy: The *Implementation Guide for Direct Project Trust Bundle Distribution v1.0* has provisions for automated updates through periodic polling of each Trust Bundle. NATE-QEs may implement a manual process.

The following flow charts illustrate the Procedure for adding a new NATE-QE to a Trust Bundle. Numbers within individual steps in the flow chart reference numbered steps in the above Procedure.





B. Removing a Member from a Trust Profile

Precondition: The Evaluation Authority has determined that a NATE-QE should be removed from a NATE Trust Bundle, or a NATE-QE has determined that it no longer wishes to participate in a NATE Trust Profile.

Post-condition: The NATE-QE has been removed from the appropriate NATE Trust Bundle.

1. The Evaluation Authority determines that a NATE-QE no longer meets the policy and process requirements for a NATE Trust Profile or, for some other reason, should be removed from a NATE Trust Bundle, or a NATE-QE may wish to be removed. If the NATE-QE itself wishes to be removed, a representative of the NATE-QE may contact the Trust Bundle Coordinator and request removal from the Trust Bundle.

Rationale – The Evaluation Authority has the sole authority to determine whether an organization should be removed from a NATE Trust Bundle due to non-conformance with policies and processes required for a NATE Trust Profile.

Noteworthy: A NATE-QE may no longer wish to participate in a NATE Trust Profile. While a NATE-QE may simply remove a NATE Trust Bundle from its trust store to disable exchange, it may also wish to be removed so its nonparticipation is made clear to other NATE-QEs.

2. The Evaluation Authority will determine if the NATE-QE's failure to meet the policy and process requirements for a NATE Trust Profile or other actions or omissions represents a continuing and material risk to the privacy and security of individuals' health information.

Rationale – This determination is necessary to determine whether the NATE-QE should be immediately suspended from the NATE Trust Bundle, or whether the NATE-QEs potential suspension should wait for any appeal to be resolved.

3. If the Evaluation Authority determines that there is a continuing and material risk to the privacy and security of individuals' health information, then the Evaluation Authority will: (i) inform the NATE-QE of its decision and the NATE-QE's immediate suspension, including how the NATE-QE may appeal the decision; and (ii) contact the Trust Bundle Coordinator by email instructing the Coordinator to remove the organization from the appropriate NATE Trust Bundle.
4. If the Evaluation Authority determines that there is not a continuing and material risk to the privacy and security of individuals' health information, then the Evaluation Authority will inform the NATE-QEs of its decision, including how the NATE-QE may appeal the decision.

5. A NATE-QE may appeal the decision of the Evaluation Authority to remove the NATE-QE from a NATE Trust Bundle. The NATE-QE may contact the Evaluation Authority via email to initiate an appeal. If the NATE-QE does not appeal the Evaluation Authority's decision within 60 days, then the Evaluation Authority's decision to suspend the NATE-QE shall stand. If the Evaluation Authority determined that immediate suspension of the NATE-QE was not required but the NATE-QE does not file an appeal within 60 days, then the Evaluation Authority shall contact the Trust Bundle Coordinator by email instructing the Coordinator to remove the organization from the appropriate NATE Trust Bundle.
6. If the NATE-QE emails the Evaluation Authority to initiate an appeal, then the Evaluation Authority shall hold a special meeting of all members of the Trust Bundle to consider the appeal. Each member of the Trust Bundle will be invited to attend the meeting, and shall be given at least 15-day prior notice of the special meeting. The Evaluation Authority will have a reasonable opportunity to present its decision that the NATE-QE no longer meets the policy and process requirements for a NATE Trust Profile or, for some other reason, should be removed from a NATE Trust Bundle. The NATE-QE will have a reasonable opportunity to explain why it meets the policy and process requirements for the NATE Trust Profile, or any other reason why it should continue to be included in the NATE Trust Bundle. All Trust Bundle members that attend the special meeting, other than the NATE-QE that the Evaluation Authority suspended or has proposed to suspend, shall have an equal vote regarding whether to overturn the Evaluation Authority's suspension decision. No quorum shall be needed, and the appeal shall be decided by a simple majority. In the event the vote results in a tie, the Evaluation Authority's decision shall stand. The conclusions of this special meeting shall be final.
7. If the special meeting results in upholding the Evaluation Authority's decision and the Evaluation Authority previously determined that immediate suspension was necessary, then no further action by the Evaluation Authority is required.

Rational – in this case the NATE-QE is already suspended and the appeal of the NATE-QE did not reverse the action of the Evaluation Authority.

8. If the special meeting results in upholding the Evaluation Authority's decision and the Evaluation Authority previously determined that immediate suspension was not necessary, then the Evaluation Authority shall contact the Trust Bundle Coordinator by email instructing the Coordinator to remove the organization from the appropriate NATE Trust Bundle.
9. If the special meeting results in overturning the Evaluation Authority's decision and the Evaluation Authority previously determined that immediate suspension was necessary, then the Evaluation Authority shall contact the Trust Bundle Coordinator by email

instructing the Coordinator to add the organization back to the appropriate NATE Trust Bundle using the normal procedures for adding members to the Trust Bundle.

10. If the special meeting results in overturning the Evaluation Authority's decision and the Evaluation Authority previously determined that immediate suspension was not necessary, then no further action by the Evaluation Authority is required.
11. Based on the decision of the Evaluation Authority and, if applicable, the results of the special meeting of members, the Trust Bundle Coordinator removes the NATE Trust Certificate for the removed organization from the appropriate NATE Trust Bundle.

Rationale – It is desirable for NATE to define a single point of contact – the Trust Bundle Coordinator – to manage the process for Trust Community Administration.

12. The Trust Bundle Coordinator publishes the updated NATE Trust Bundle.
13. The Trust Bundle Coordinator sends an email to the Board of Directors and the trust bundle POCs of all NATE-QEs that are members of the NATE Trust Profile alerting them that the NATE Trust Bundle has been updated.

Rationale – The *Implementation Guide for Direct Project Trust Bundle Distribution v1.0* does not call for any in-band or out-of-band notification of Trust Bundle changes, but instead places the responsibility for establishing the update schedule on the Trust Community member. Email will be used to contact the trust bundle POCs to ensure that all NATE-QEs update their trust stores promptly.

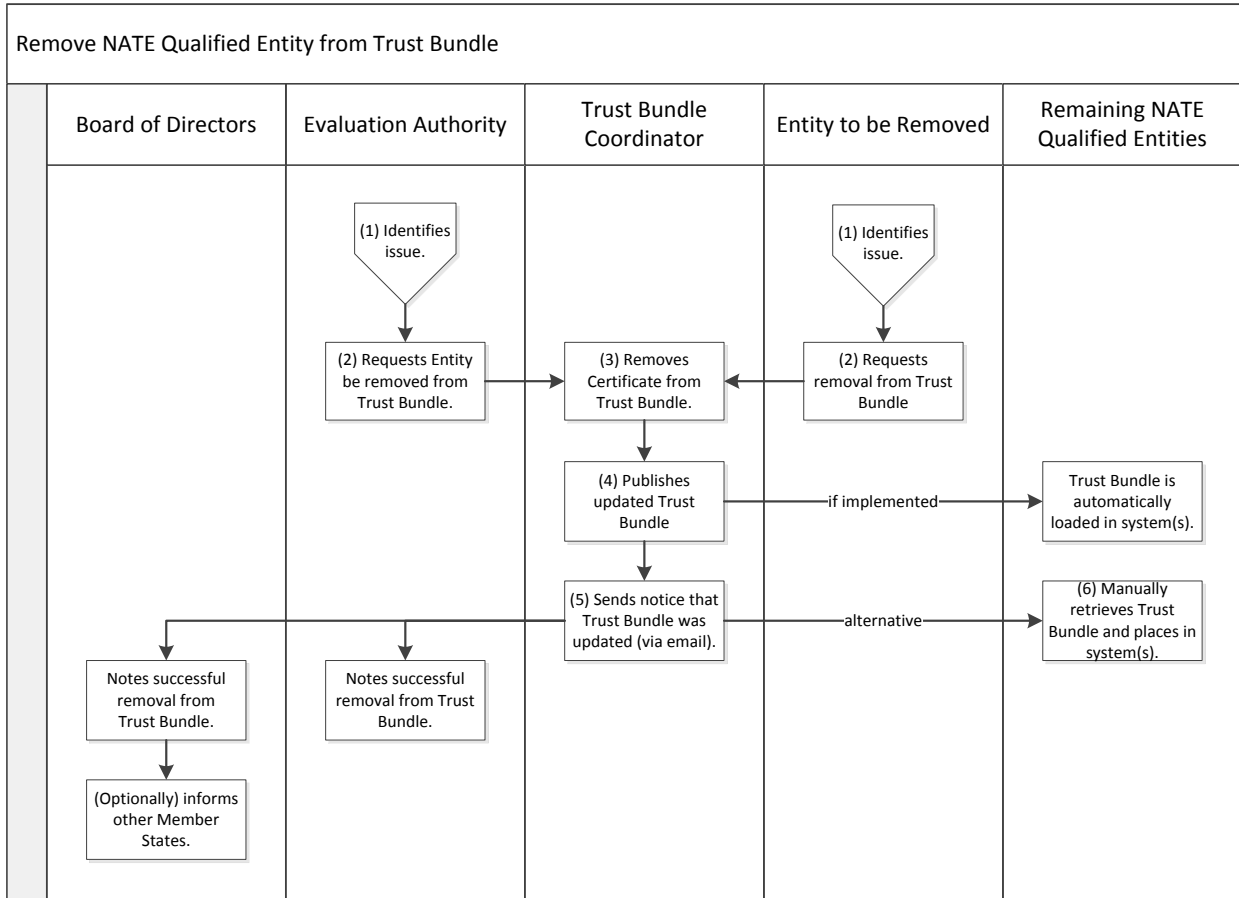
Noteworthy: The Board of Directors is alerted simply so they may monitor updates to NATE Trust Bundles. The Board of Directors might also alert Member States at its discretion.

14. The trust bundle POCs of all NATE-QEs in the NATE Trust Profile download the updated Trust Bundle from the web service, and update the trust stores.

Rationale – This update removes the NATE Trust Certificate of the removed organization (former NATE-QE) from the local trust store of each NATE-QE, disabling exchange and effectively removing the organization from the NATE Trust Profile.

Noteworthy: The *Implementation Guide for Direct Project Trust Bundle Distribution v1.0* has provisions for automated updates through periodic polling of each Trust Bundle. NATE-QEs may implement a manual process.

The following flow chart illustrates the Procedure for removing an existing NATE-QE from a Trust Bundle. Numbers within individual steps in the flow chart reference numbered steps in the above Procedure.



IV. References

Implementation Guide for Direct Project Trust Bundle Distribution v1.0, which can be found at <http://wiki.directproject.org/Trust+Bundle+Sub+Work+Group>.

V. Related Forms

None.

VI. Version History

	Date	Author	Comment
1.0	10/29/2013	Aaron Seib	Approved Version
2.1	10/01/2014	Aaron Seib	Initial-Draft artifact for Phase 2 Crowdsourcing Revisions required to reflect addition of NATE as Evaluation Authority
2.2	10/07/2014	Robert Cothren	Updated illustrations to reflect new terminology labels.
3.0	12/15/2014	Aaron Seib	Revised-Draft artifact for Phase 2 Crowdsourcing
4.0	12/23/2014	Meryt McGindley	Revised-Draft artifact for Phase 2 Crowdsourcing Revisions required to reflect addition of appeals process
5.0	01/05/2015	Aaron Seib	Updated language related to Appeals.
6.0	01/13/2015	Aaron Seib	Revisions to clarify the appeal process.