

201911 November Harmonization

Harmonization Dates: Initial proposals due 10/26; final submissions due 11/29; Harmonization meeting scheduled for 12/3 - 4.

Final Report: At the HL7 Harmonization meeting on 12/3/2019 six proposals described at <https://confluence.hl7.org/display/SEC/201911+November+Harmonization> were approved. Among these were two related to implementing the 32 CFR Part 2 Controlled Unclassified Information (CUI) requirements to support the Sequoia requested [Cross Paradigm CUI Security Labeling IG PSS Minutes](https://confluence.hl7.org/display/HARMZTN/2019+December+20191203+Meeting+Notes) at <https://confluence.hl7.org/display/HARMZTN/2019+December+20191203+Meeting+Notes>.

The following Initial 201911 Harmonization Proposals 1,2,3 were approved on the [2019-10-22 Security WG Agenda/Minutes](#) call

Security approved sponsoring final submission of proposals 1,2 3, and cosponsoring final submission of proposals 4,5, 6 sponsored by CBCP 11/19 [2019-11-19 Security Agenda/Minutes](#)

CBCP approved being cosponsor [2019-10-29 CBCP Supports November Harmonization Proposals 4,5,6](#) as sponsors and cosponsor of 1,2,3. Approved Final as sponsor for 4,5, 6 and cosponsor for 1,2 3 [2019-11-19 CBCP Meeting Agenda/Minutes DRAFT](#)

Initial submission of Harmonization Proposals 1,2, 3 approved.

Moved: Kathleen Seconded: Beth

Carrie Hammond abstained

12-1-0

Proposal 1: Create CUIMark Obligation Code

Change Leaf Concept PRIVMARK to Specializable with a CUIMark child concept Proposal.

Create Leaf Concept

CUIMark (display CUI Mark)

Description:

CUI Custodians must create, persist, display, and convey computable and human readable security label CUI tags as required by CUI Marking policies including US [32 CFR Part 2002](#) and US [Executive Order 13556 "Controlled Unclassified Information"](#) . CUI Custodians must enforce CUI Security Controls per applicable CUI policies.

Custodians include a CUI classifier of original CUI content; or a CUI derivative classifier, which reclassifies CUI content that has been aggregated with other CUI or Unclassified Uncontrolled Information (U) or dissembled from a larger CUI content

Recipients of CUI tagged content, CUIMark Obligation security labels must consume, persist, display, and enforce CUI controls per applicable CUI policies.

Usage Note: Applicable CUI policies include:

- [Executive Order 13556](#)
- [CUI Rule 32 CFR Part 2002](#)
- [SP 800-171A](#)
- [CUI Marking Handbook](#)
- [CUI Registry - Health Information Category](#)
- [CUI Registry: Limited Dissemination Controls](#)
- [CUI Policy and Guidance](#)

Recommendation for HL7 RIM Model Vocabulary Changes For Information Only: Nov 2019		RECOMMENDATION# Security 1	
Sponsorship: Security 100 This Appropriately Sponsors: Initial		Sponsor's Status: Final	
Editor: Author - Ralfmann,Carole			
PROPOSAL NAME: Create CUI Mark Obligation Code			
<input checked="" type="checkbox"/> New Model Change		<input type="checkbox"/> Editorial Vocabulary Change	
<input type="checkbox"/> Extension Change		<input type="checkbox"/> Other Vocabulary Change	
SUMMARY RECOMMENDATION Create CUI Mark Obligation Code as new Child of Prohibit Obligation Code			
VOCABULARY OBJECTS CHANGE SUMMARY This table is for the purpose of the approval from column. For each row, the number of vocabulary changes in the proposal. This is search create check the accuracy of capturing and adding the recommended changes.			
Added	Modified	Deleted	Retired
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0
* Please include a list of vocabulary objects and the codes (e.g., HL7, SNOMED, ICD, etc.) with the object's status. For example, the following request format for the (Add) row and sub-row with the following request:			
POSITION OF CONCERNED ORGANIZATIONS * SELECT * FROM HL7RIMModelChange WHERE (organizationid = 'TC, SEC, other SEC') known to the statement, and should outline any constraints with: and feedback from the organization. Organize the examples below:			
Org	Organization	Approval	Comments
0	0	0	0
ISSUE Currently have PROHIBIT Obligation Code defined as: Custodian must create another maintain. Review requests security that high in requesting policy. Need to require that the Obligation Code must comply with applicable laws, regulations, executive orders, and other guidances, such as included in DURSAs, to persist, mark, and enforce required CUI controls. CUI Mark Obligation Code CUI Mark Obligation Code CUI Mark Obligation Code			
CURRENT STATE 1. Initial: For which proposal is being reviewed. 2. Review: For which proposal is being reviewed. as HL7 SEC, or as ANS or ISO approved. SEC. 3. For approval only: not for Harmonization. HL7/ISO. 4. For approval only: not for Harmonization. HL7/ISO.			

Initial Proposal



Final Proposal

Proposal 2: Comply with Policy Obligation Codes Proposal

Create a new Specializable parent [CPLYPOL in the ObligationPolicy ActCode system under which the various policies requiring compliance can be nested. Add a new ObligationPolicy_CPLYPOL_CPLYCUI to support emerging US realm need to inform recipients of Federal Agency source Controlled Unclassified Information (CUI) that they must comply with the applicable laws, regulations, executive orders, and other guidances, such as included in DURSAs, to persist, mark, and enforce required CUI controls. Add a Comply with Jurisdictional Security Policy.

Update current CPLYPOL to be a Specializable parent of

CPLYCC

CPLYDC

CPLYJPP

CPLYJSP

CPLYOPP

CPLYOSP

CPLYCUI

LEAF CONCEPT:

CPLYJSP (comply with jurisdictional security policy)

Description:

Custodian security system must retrieve, evaluate, and comply with applicable jurisdictional security policies associated with the target information.

LEAF CONCEPT:

CPLYCUI (comply with controlled unclassified information policy)

Description:

Custodian security system must retrieve, evaluate, and comply with applicable US Controlled Unclassified Information (CUI) policies associated with the target information.



Initial Proposal



Final Proposal

Proposal 3: Add Upgrader Role Code Proposal

Recommendation for HL7 RIM Encoder Vocabulary Changes		RECOMMENDATION ID:																						
The Harmonization Change: Nov 2019		Security: 5																						
Approved by: <input type="checkbox"/> Security 5	Class Approval by Sponsor: <input type="checkbox"/> Initial	Sponsor's Initial:																						
	Final	Sponsor's Initial:																						
Editor: Author - Submittal/Change																								
PROPOSAL NAME: UPGRADER Role Code																								
<input type="checkbox"/> Class Model Change	<input type="checkbox"/> Structural Vocabulary Change																							
<input type="checkbox"/> Extension Change	<input type="checkbox"/> Other Vocabulary Change																							
SUMMARY RECOMMENDATION																								
Role Code system is missing a class for Upgrader Role. Other associated roles are already included.																								
VOCABULARY OBJECTS CHANGE SUMMARY																								
<p>OBJECTS: In the numbers in the OBJECTS column that list the number of objects being changed in the proposal. This is usually zero, since the majority of coding and objects are unaltered in proposals.</p> <table border="1"> <thead> <tr> <th>Object</th> <th>Proposed</th> <th>Current</th> </tr></thead> <tbody> <tr> <td>1</td> <td>1</td> <td>1</td> </tr> <tr> <td>2</td> <td>1</td> <td>1</td> </tr> <tr> <td>3</td> <td>1</td> <td>1</td> </tr> <tr> <td>4</td> <td>1</td> <td>1</td> </tr> <tr> <td>5</td> <td>1</td> <td>1</td> </tr> <tr> <td>6</td> <td>1</td> <td>1</td> </tr> </tbody> </table> <p>* There is a total of seven objects in the proposal, not six. Two are HL7 Class (CLASS) and two are HL7 Role (ROLE) codes. The remaining three are HL7 Role (ROLE) codes. The remaining three are HL7 Role (ROLE) codes.</p>				Object	Proposed	Current	1	1	1	2	1	1	3	1	1	4	1	1	5	1	1	6	1	1
Object	Proposed	Current																						
1	1	1																						
2	1	1																						
3	1	1																						
4	1	1																						
5	1	1																						
6	1	1																						
POSITIONS OF CONCERNED ORGANIZATIONS																								
<p>OBJECTS: The table below lists the organizations that have been contacted (e.g., TC, NCI, other NCI) to review the proposal, and should include any comments or feedback from the organization. If none, the organization name is blank.</p> <table border="1"> <thead> <tr> <th>Object</th> <th>Organization Name</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td>1</td> <td></td> <td></td> </tr> <tr> <td>2</td> <td></td> <td></td> </tr> <tr> <td>3</td> <td></td> <td></td> </tr> <tr> <td>4</td> <td></td> <td></td> </tr> <tr> <td>5</td> <td></td> <td></td> </tr> <tr> <td>6</td> <td></td> <td></td> </tr> </tbody> </table>				Object	Organization Name	Comments	1			2			3			4			5			6		
Object	Organization Name	Comments																						
1																								
2																								
3																								
4																								
5																								
6																								
ISSUE:																								
<p>ISSUE: Specify the type of Role permitted to increase security levels when the classification is upgraded. E.g., Confidential code may require for immediate Release to Normal when information about e.g. a condition covered by a Worker Compensation condition is submitted to the health insurance company and may have more protection law, e.g. to address government health record.</p>																								
CURRENT STATE																								
<p>Current: For Harmonization, AffiliationRoleType_AgentRoleType role includes the following code missing an Upgrader Role code.</p>																								
<p>* Identifier for task proposed to be used to sponsor</p> <p>† Number approved by HL7 TC, or NCI Transnational Committee, or HL7 SSC, or an ANS or ISO standard. NCI</p> <p>‡ For sponsoring only, not for Harmonization identification</p> <p>§ For sponsoring only, Sponsor's Initial must be "Approved" for submission to Harmonization</p>																								

Initial Proposal



Final Proposal

Add UPGRDER as a child of RoleCode_AffiliationRoleType_AgentRoleType

LEAF CONCEPT:

UPGRDER (upgrader)

Description:

An individual authorized to raise the classification level of labeled content and provide rationale for doing so as directed by a classification guide.

Proposal 4: Fix a)HIPAAConsent

ActCode_ActPrivacyLaw.a)HIPAAConsent has erroneous code. Should not have "a)" in the code. Simply need to remove "a)".



2019Dec_HARM_F...1026212548.doc

Initial Proposal



2019Dec_HARM_I...1026212548.doc

Final Proposal

Proposal 5: CDS Compartment

Create a Compartment Security Label tag for CDS (Clinical Decision Support System) to support authorizing CDS to access information to which system end users may not be authorized due to restrictive privacy policies in order to enable patient safety alerts where e.g., an unauthorized provider may be ordering a medication or procedure, which is contraindicated based on masked information in the patient's record.



2019Dec_HARM_I...1026215118.doc

Initial Proposal



2019Dec_HARM_F...1026215118.doc

Final Proposal

Add a child to

SPECIALIZABLE CONCEPT:

COMPT (compartment)

Description:

This is the healthcare analog to the US Intelligence Community's concept of a Special Access Program. Compartment codes may be used in as a field value in an initiator's clearance to indicate permission to access and use an IT Resource with a security label having the same compartment value in security category label field.

Leaf Concept

CDSCOMPT

Description

Description:

A security category label field value, which indicates that access and use of an IT resource is authorized for a Clinical Decision Support System (CDS) as programmed to respond to potential or definitive contraindicated orders by an end user, which may not be authorized to access the same information, based on e.g., allergies, contraindicated medications, procedures, or devices,

until the CDS throws an alert advising the unauthorized orderer to “break the glass” by accepting accountability for that access.

FINAL Proposal 5: CDS Compartment

See notes

[CDS Compartment Proposal November 201911 Harmonization](#)

Proposal 6: Specialize MDHHS-5515

The current MDHHS-5515 Michigan Consent to Share Behavioral Health Information for Care Coordination Purposes is actually a compound consent directive under two different laws. In order to efficiently design a security label for governed information, two children codes are needed.



Initial Proposal



Final Proposal

Revise current MDHHS-5515 Description as follows [also embedding text file to deal with MSFT character issues]

The State of Michigan standard privacy consent form for sharing of health information specific to behavioral health and substance use treatment in accordance with Public Act 129 of 2014. In Michigan, while providers are not required to use this new standard form (MDHHS-5515), they are required to accept it.

Usage Note: For legislative background, current MDHHS-5515 consent directive form, and provider and patient FAQs see http://www.michigan.gov/mdhhs/0,5885,7-339-71550_2941_58005-343686--,00.html

Add New Leaf Concept: MDHHS-5515Part2 (Michigan Consent to Share Behavioral Health Information for Care Coordination Purposes 42 CFR Part 2)

Description:

The State of Michigan standard privacy consent form for sharing of health information specific to substance use information governed under 42 CFR Part 2 in accordance with Public Act 129 of 2014.

Usage Note: For legislative background, current MDHHS-5515 consent directive form, and provider and patient FAQs see http://www.michigan.gov/mdhhs/0,5885,7-339-71550_2941_58005-343686--,00.html

Add New Leaf Concept: MDHHS-5515MMHC (Michigan Consent to Share Behavioral Health Information for Care Coordination Purposes Michigan Mental Health Code)

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Description:

The State of Michigan standard privacy consent form for sharing of health information specific to behavioral health governed by the Michigan Mental Health Code Act 258 of 1974, which require patient authorization for purposes other than treatment, payment, and coordination of care, in accordance with Public Act 129 of 2014.

Usage Note: For legislative background, current MDHHS-5515 consent directive form, and provider and patient FAQs see http://www.michigan.gov/mdhhs/0,5885,7-339-71550_2941_58005-343686--,00.html