

Center for Medical Interoperability

TOGETHER for PPE Governance Policy

Edition 1.2

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The Center for Medical Interoperability Trust Platform Governance Plan, Edition 1.2

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1. Introduction

1.1 Scope and Governance Principles

This Charter and Governance document defines the policies, processes, and mechanisms governing the Trust Platform for the TOGETHER for PPE project. It establishes the Center for Medical Interoperability (“C4MI”) as the Governing Authority of the Trust Platform and a Steering Committee specific to the TOGETHER for PPE project.

TOGETHER is a public-private partnership between C4MI and the Centers for Disease Control and Prevention (“CDC”) to improve nationwide readiness and response. TOGETHER for PPE readiness is intended to address personal protective equipment (PPE) shortages during pandemics of highly infectious diseases. C4MI’s Trust Platform for data exchange is uniquely suited to address interoperability gaps in information systems such as inventory management.

A uniform and foundational approach to Trust Platform governance and technical architecture promotes consistency in structure, specification of context through use cases, and supports reusability and modularity of the overarching architecture. This document provides strategy, process and mechanisms that will support trusted, secure, interoperable exchange of healthcare information across geographies, ecosystem participants, and existing information network relationships using different data sharing networks.

The Trust Platform supports a collaborative process among industry and government to facilitate consensus and develop the essential elements needed to allow this widespread connectivity. Organizations that elect to engage in exchange activities through the Trust Platform Technical Architecture will execute a Common Data Usage Agreement and will be able to interoperate with all other Participants and avoid the need to join multiple data exchange networks and execute several point-to-point policy agreements.

1.2 Governance Mechanism

The governance mechanism of the Trust Platform Technical Architecture consists of:

- Center for Medical Interoperability Trust Platform Governing Authority
- Center for Medical Interoperability TOGETHER for PPE Steering Committee Charter
- Center for Medical Interoperability Common Data Usage Agreement
- Healthcare Trust Platform Technical Specifications
 - Healthcare Trust Platform Architecture Specification(s)
 - Healthcare Trust Platform Implementation Specification(s)
 - TOGETHER Data, Interfaces, and Services

2. Oversight

2.1 TOGETHER for PPE Trust Platform Governing Authority (C4MI)

The Center for Medical Interoperability (C4MI) is the Governing Authority of the TOGETHER for PPE Trust Platform. In general, the role of the Governing Authority for any Trust Platform instance is to define, operate, and manage participation in the platform, from both a governance and technical perspective. It is also responsible for developing each edition of the Trust Platform Technical Specifications and Trust Platform Common Data Usage Agreement.

2.2 TOGETHER for PPE Steering Committee

The role of the TOGETHER for PPE Steering Committee (“Steering Committee”) is to serve as a primary resource and leadership team that guides C4MI Trust Platform activities as it relates to TOGETHER for PPE readiness project deliverables. The Steering Committee will guide and inform decisions related to the deployment of the Trust Platform for the TOGETHER for PPE project.

The Steering Committee will assist C4MI in managing and executing TOGETHER for PPE Common Data Usage Agreements with eligible participants.

Please refer to the Center for Medical Interoperability TOGETHER for PPE Steering Committee Charter for more detailed information.

3. Definitions

Authorized User	Any person authorized by a Participant to access, administer, modify, or otherwise TOGETHER for PPE Trust Platform components or data, including Participant PPE Data.
Participation and Common Data Use Agreement	Legal framework that will enable participants to access information related to PPE using the TOGETHER for PPE Trust Platform
Governing Authority	The organization that defines, operates, and manages participation in the Trust Platform, from both governance and technical perspectives.
Participant	An Organization or other Entity that enters into the Participation and Common Data Usage Agreement and participates in the Platform Technical Architecture by using or providing one or more Trust Applications or Services.
Security Server	Technology solution leveraged by Participants to act as an on-ramp for Trust Applications and Services.
Technical Specifications	Technical documents defining the TOGETHER for PPE platform technical architecture, requirements for its implementation, and associated data and services. Specific documents include, but are not limited to: <ul style="list-style-type: none"> - 'Healthcare Trust Platform Technical Specification' - 'Healthcare Trust Platform Technical Implementation Based on Cybernetica® UXP®' - 'Data, Interfaces, and Services for PPE Data Exchange'
Trust Application	Participant provided software component used via communications over the Platform, leveraged by one or more Participants and used for specific use cases.
Trust Element	Any component of the Trust Platform including Security Servers, Trust Services and Trust Applications
Trust Platform	The technical and governance framework that enables comprehensive interoperability, data liquidity, and trust between participants.
Trust Service	Government Authority provided software component used via communications over the Platform, leveraged by multiple Participants. Foundational Services provide key functionality such as registration; Value-Added Services are for specific use-cases.

4. Administration of the Trust Platform

4.1 Principles of Administration

The following main principles shall be observed in administration of the Trust Platform:

- 1) **Common Technical Framework** – An overarching Technical Architecture enhances interoperability, data liquidity, and trust, enabling Participants to communicate with each other and leverage shared Trust Services.
- 2) **Multilaterality** – Participants enter into a common legal and business arrangement, the Common Data Usage Agreement, that provides a legal framework that enables participants to access information related to PPE using the TOGETHER for PPE Trust Platform.
- 3) **An open and standardized approach** – When possible, international standards and protocols are used in governance and operation of the Trust Platform.
- 4) **Security** – The Trust Platform facilitates privacy, provenance, and integrity of all exchanged data.

4.2 Duties of Trust Platform Governing Authority

4.2.1 Requirements

The Governing Authority shall:

- 1) Define the Trust Platform, including:
 - a. Establishing this Governance Policy;
 - b. Developing the Participation and Common Data Use Agreement for the TOGETHER for PPE Trust Platform, which provides a common legal frameworks Governance Policy and the Common terms and conditions for subscription to the Trust Platform and its applications and use;
 - c. Defining the Trust Platform Technical Specifications, which define the technical architecture for the Trust Platform, including data, interface, and service requirements for PPE data exchange;
- 2) Operate the Trust Platform, including:
 - a. Operating and ensuring the availability of Foundational Trust Services to provide the core technical functionality of the Trust Platform;
 - b. Operating and ensuring the availability of Value-Added Trust Services specific to TOGETHER for PPE;
 - c. Monitoring the use of the Trust Platform, including the collection of usage statistics and for ensuring adherence to the Participation and Common Data Use Agreement and Technical Specifications;
 - d. Handling any security incidents, including facilitating auditing processes;
- 3) Manage participation in the Platform, including:

- a. Establishing and maintaining registration processes for Participants and their Security Servers and Trust Applications.
- b. Notifying Participants of any changes in the governance or operation of the Trust Platform, and of any circumstances or maintenance works restricting the use of the Trust Platform;
- c. In appropriate cases, restricting or revoking Trust Platform access.

4.2.2 Terms of Notification

The Governing Authority shall observe the following terms for advance notice:

- 1) Advance notice shall be given of any changes in the governance or operation of the Trust Platform, and of scheduled maintenance works;
- 2) Advance notice shall be given regarding any changes made to the Trust Platform Technical Specifications, which call for an update to any Security Server or Trust Application operated by a Participant.

4.3 Obligations of Trust Platform Participants

Trust Platform Participants shall:

- 1) Register Trust Elements, including:
 - Registering their organization, Security Servers, and Trust Applications in accordance with the processes and mechanisms established by the Governing Authority;
 - Updating the Governing Authority of organizational or technical changes when appropriate;
- 2) Operate Security Servers and Trust Applications, including:
 - Operating and ensuring the availability of Security Servers and Trust Applications in accordance with the Technical Specifications and Participation and Common Data Use Agreement;
 - Managing Authorized Users and appropriately granting or restricting access to Trust Elements in accordance with the Participation and Common Data Use Agreement;
 - Notifying the Governing Authority immediately of any problems or circumstances which affect or may affect the governing authority or a Trust Platform Participant in the performance of its duties;
 - Notifying the Governing Authority of any security incident or imminent threat thereof;
 - d. Participating in the handling of any security incidents, including auditing processes;
- 3) Appropriately handle data exchanged via the Trust Platform, including:
 - Executing the Trust Platform Common Data Usage Agreement;
 - Taking best-practice data protection measures and appropriate physical, organizational and IT security measures to ensure the integrity, confidentiality and availability of data;

- Providing, at the request of the Governing Authority, the information necessary for assessing the security of the Trust Platform, including a description of the Participant’s security program;
- Managing Authorized Users and appropriately granting or restricting access to data exchanged via the Trust Platform in accordance with the Participation and Common Data Use Agreement.

4.4 Use of The Trust Platform

4.4.1 Registration to participate in Trust Platform

- 1) Applications for registration with the Trust Platform shall be filed through the Governing Authority.
- 2) Upon registration with the Trust Platform, the applicant shall enter into a Trust Platform Common Data Usage Agreement with the Governing Authority. The agreement shall specify the parties’ rights, obligations, and liabilities.

4.4.2 Refusal of registration application

The Governing Authority shall have the right to reject a registration application to the Trust Platform if:

- 1) The applicant has failed to submit the required documents requested by the Governing Authority or the applicant has no right of representation for submitting such application;
- 2) The information submitted upon registration application is incorrect or not up to date;
- 3) The applicant or the applicant’s (potential) Trust Elements fail to meet other requirements specified in this Governance Policy, Trust Platform Technical Specifications, Participation and Common Data Use Agreement, or the other principles of functioning of the Trust Platform.

4.4.3 Requirements for Trust Applications

A Trust Application shall:

- 1) Meet the requirements defined in the Trust Platform Technical Specifications and Participation and Common Data Use Agreement
- 2) Be registered with the Governing Authority;
- 3) Be usable in the Trust Platform test environment.

4.4.4 Termination of Trust Platform participation

- 1) A Trust Platform participant may terminate the participation at any time by filing a respective application to the Governing Authority.
- 2) In the event that the termination application does not contain the date of termination of the Trust Platform participant, the participant shall be terminated as of the working day following the date of receipt of the above-mentioned application.
- 3) The Governing Authority shall have the right to terminate a participant with immediate effect or restrict the rights arising from the participation or issue a deadline for elimination of a deficiency if:
 - a. A Trust Platform participant has filed incorrect or incomplete information during registration;

- b. A Trust Platform Participant violates the terms or conditions specified in this Governance Policy.
- 4) The Governing Authority shall have the right to terminate a participant by notifying the Trust Platform Participant thereof by e-mail 30 calendar days in advance in the event of a failure of the Trust Platform Participant to respond to repeated inquiries issued by the Governing Authority.