

**Attachment B. Privacy Frameworks and Principles Identified by the Health Information Protection Taskforce**

Organization	Name of Principle/Framework	Elements of Privacy Principles/Framework	
Markle Foundation	Connecting for Health Privacy Principles	Element	Guiding Questions and Considerations
		Openness and Transparency	<ul style="list-style-type: none"> <li>• Is it easy to understand what policies are in place, how they were determined, and how to make inquiries or comment?</li> <li>• Is it clear who has access to what information for what purpose?</li> </ul>
		Purpose Specification and Minimization	<ul style="list-style-type: none"> <li>• What is the purpose of data collection data?</li> <li>• Are the purposes narrowly and clearly defined?</li> </ul>
		Collection Limitation	<ul style="list-style-type: none"> <li>• Are only those data needed for the specified purposes being collected</li> <li>• Are subjects fully informed of what is being collected?)</li> </ul>
		Use Limitation	<ul style="list-style-type: none"> <li>• Will data only be used for the purposes stated and agreed to by the subjects?</li> </ul>
		Individual Participation and Control	<ul style="list-style-type: none"> <li>• Can an individual find out what data has been collected and exercise control over whether and with whom it is shared?</li> </ul>
		Data Integrity and Quality	<ul style="list-style-type: none"> <li>• How are data kept current and accurate?</li> </ul>
		Security Safeguards and Controls	<ul style="list-style-type: none"> <li>• How are the data secured against breaches, loss or unauthorized access?</li> </ul>
		Accountability and Oversight	<ul style="list-style-type: none"> <li>• Who monitors compliance with these policies and how is the public informed about violations?</li> </ul>
Remedies	<ul style="list-style-type: none"> <li>• How will complaints be handled?</li> <li>• Will consumers be able to respond to or compensated for mistakes in decisions that are based upon the data?</li> </ul>		

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National Partnership for Women and Families	Consumer Principles for Health IT	Element	Guiding Questions and Considerations
		Right to Individually Access	Individuals should be able to access their personally identifiable health information conveniently and affordably <ul style="list-style-type: none"> <li>▪ Access should be direct &amp; secure</li> <li>▪ Should be to all of their records (except if danger to person or another)</li> <li>▪ Should include ability to supplement, request correction of, and share their information without unreasonable fees or burdens</li> </ul>
		Right to Know Access by Others	Individuals should know how their e-health information may be used and who has access to it <ul style="list-style-type: none"> <li>▪ Should be provided with understandable information on who can access and ways it can be used or shared</li> <li>▪ Should be limited only authorized individuals or entities</li> <li>▪ Should include tracking and audit trail systems</li> </ul>
		Right to Control Access by Others	Individuals should have control over whether and how their information is shared. <ul style="list-style-type: none"> <li>▪ Should include ability to at least opt-out, in whole or in part</li> <li>▪ Should be able to limit use of info for commercial purposes</li> <li>▪ Should include revocable right to designate someone else to exercise this control</li> </ul>
		Right to Enforceable Safeguards	Systems for e-health data exchange must protect the integrity, security, privacy and confidentiality of an individual's information. <ul style="list-style-type: none"> <li>▪ Should be protected by reasonable safeguards against loss, unauthorized access, destruction, and improper use, modification or disclosure</li> <li>▪ Such safeguards must follow the information</li> <li>▪ Should include timely notification of individuals in event of breach</li> <li>▪ Should include legal and financial remedies in event of breach</li> <li>▪ Privacy standards that restrict use and disclosure should apply to all entities engaged in health information exchanges</li> </ul>
Right to Publicly Accountable Governance	Governance and administration of e-health networks should be transparent and publicly accountable. <ul style="list-style-type: none"> <li>▪ Should be overseen by independent bodies accountable to the public</li> <li>▪ Should give consumers equal footing with other stakeholders</li> </ul>		

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Florida Health Information Security and Privacy Collaboration Project	Patient Care Framework	Element	Guiding Questions and Considerations
			<ul style="list-style-type: none"> <li>▪ Need for timely and accurate data</li> <li>▪ Need for whole body approach</li> <li>▪ Need for mutual trust and honesty</li> <li>▪ Need for best technological tools to minimize medical errors</li> <li>▪ Need to encourage rational choices</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Must be consistent with good patient care</li> <li>▪ Respective of individual needs</li> <li>▪ Easy to use and understand</li> <li>▪ Cost effective to administer</li> </ul>		