

Testimony on Amendments to 101 CMR 20.00: Highway Information Exchange

June 29, 2026

Introduction

Good afternoon. My name is Julie Creamer, and I am the Manager of Mass HIway Operations for the state's Health Information Exchange. I am here to present staff testimony on proposed amendments to regulation 101 CMR 20.00. These amendments were proposed on June 19, 2025, in the Massachusetts Register and are anticipated to be effective no sooner than November 6, 2026.

Background

The purpose of 101 CMR 20.00 is to establish the Commonwealth's regulatory framework for health information exchange through the Mass HIway, including defining the entities required or permitted to participate; establishing requirements for connecting to and using the statewide health information exchange in accordance with M.G.L. c. 118I; prescribing penalties for noncompliance as required by statute.

The regulation establishes connection requirements for provider organizations using a phased, use-case-based approach that allows providers to demonstrate meaningful participation in the health information exchange. It also establishes and supports the statewide Event Notification Service framework and other exchange mechanisms intended to improve care coordination, transitions of care, public health reporting, and interoperability across care settings.

Proposed Amendments

The purpose of the proposed amendments to these regulations is to modernize and expand the Commonwealth's Health Information Exchange framework under 101 CMR 20.00 to reflect current interoperability practices, broaden participation across care settings, and strengthen statewide exchange capabilities.

Specifically, the amendments do the following.

- Update the regulatory framework to better reflect current exchange modalities and interoperability approaches;
- Expand the Mass HIway connection requirement to additional provider types (psychiatric hospitals, behavioral health entities, long-term care facilities, and home health agencies) not included in the original implementation timeframe;
- Strengthen and align Event Notification Service (ENS) requirements, including improved expectations for ADT data quality and extending comparable requirements to psychiatric hospitals; and
- Establish a more flexible, use-case-based approach to demonstrating compliance with the Mass HIway connection requirement.

Collectively, these changes are intended to advance statewide interoperability, improve care coordination across a broader range of provider organizations, and ensure the Mass HIway regulations remain current and operationally effective as health information exchange technologies and models continue to evolve.

This concludes my testimony. Thank you.