

## Introduction

Pursuant to the Statewide Common Participation Agreement (SCPA), this SHIN-NY Standard Operating Procedure (SOP) has been developed and approved in accordance with the Statewide Collaboration Process.

New York State's 1115 Waiver was approved by the federal Centers for Medicare and Medicaid Services (CMS) on January 9, 2024 and aims to advance health equity, reduce health disparities, and support the delivery of social care. Pursuant to the 1115 Waiver, the New York State Department of Health (the Department) is implementing multiple programs to provide social care services for Medicaid Members enrolled in a plan offered by a Managed Care Organization (MCO).

The Department has tasked the SHIN-NY with facilitating certain data flow components of the 1115 Waiver. Specifically, the SHIN-NY is responsible for enabling data exchange with and/or among 1115 Waiver Participants. The 1115 Waiver Participants are Social Care Networks (SCNs), SCN Lead Entities, MCOs, and the Health Equity Regional Organization (HERO). Health Information Networks (HINs), which include New York eHealth Collaborative and the Qualified Entities, support the 1115 Waiver Participants by facilitating the flow of data for eligibility assessments, coordinating Medicaid reporting, and aggregating essential data related to the 1115 Waiver. Most of these services began in January 2025 and are expected to continue through March 31, 2027.

The SHIN-NY has been satisfying data use requests from the Department for Medicaid Purposes since the beginning of the 1115 Waiver's implementation using the use case approval process established among NYeC and the Qualified Entities (QEs) (collectively referred to as HINs) under the Data Use and Contribution Agreement (DUCA).

To ensure continuity of these important services under the SCPA, the Statewide Data Use Committee (SDUC) has approved the Health Related Social Needs Data Use Case in Support of the 1115 Waiver (1115 Waiver Use Case), which permits the use and disclosure of certain SHIN-NY Data to support the 1115 Waiver in specific ways. The Required Core SHIN-NY Data Contributions for Data Providers SOP addresses the contribution of 1115 Waiver Data to the Statewide Data Infrastructure (SDI) as Core SDI Data.

This SOP provides guidance on role-based access for 1115 Waiver Participants, including their access to SHIN-NY Data, data use boundaries, and specific protocols required for these entities to participate in the SHIN-NY for purposes of the 1115 Waiver. This SOP also provides guidance to the HINs for their role in supporting 1115 Waiver Participants and the 1115 Waiver.

## Purpose, Scope and Intended Audience

The purpose of this SOP is to describe the roles and responsibilities of 1115 Waiver Participants (SCN Lead Entities, MCOs, and the HERO) and the HINs in using the SHIN-NY for purposes of the 1115 Waiver.

## Definitions

All underlined terms in this SHIN-NY SOP are defined in the SCPA and SHIN-NY SOPs Glossary, which is available here: [SCPA and SHIN-NY SOPs Glossary](#).

## Background

### Overview of the 1115 Waiver Process

According to Department guidance<sup>1</sup>, identifying whether a Medicaid Member has unmet Health Related Social Needs (HRSNs) begins with the completion of a Screening. If the Screening results are positive, the Medicaid Member proceeds to the Assessment of the Medicaid Member's eligibility for Enhanced Services under the 1115 Waiver. The Assessment involves collaborating with the Medicaid Member to confirm their HRSNs, reviewing current services the Medicaid Member may already be receiving, and discussing additional social risk factors and clinical criteria to determine eligibility for Enhanced Services. Information for this process is drawn from the Enhanced Services Member File (ESMF Data) provided by the MCO, as well as supplemental details from the Medicaid Member and/or their healthcare provider. If the Medicaid Member is found to be eligible, a Referral is made for appropriate services.

### SCN Lead Entity's Role

An SCN Lead Entity plays a critical role in this process. The SCN Lead Entity is responsible for contracting and coordinating with a network of HRSN service providers, including Community-Based Organizations (CBOs), healthcare providers (such as behavioral health and primary care providers), and other organizations offering Enhanced Services. The SCN Lead Entity serves as a regional hub for Medicaid Member outreach. The entity facilitates Screenings, Assessments, and Referrals under this program. SCN Lead Entities Contribute 1115 Waiver Data to the SHIN-NY and utilize the SHIN-NY to facilitate Screenings and Assessments, obtain Assessment results, and coordinate Referrals.

### MCO's Role

Under the 1115 Waiver, MCOs, licensed entities under Article 44 of the New York Public Health Law, provide Enhanced Services for eligible Medicaid Members through contracts they have with SCN Lead Entities. MCOs are responsible for transferring and contributing ESMF Data to the SHIN-NY via the Statewide Data Infrastructure (SDI) for the purpose of facilitating SCN Lead Entities' provision of HRSN services for eligible Medicaid Members. Through the SHIN-NY, an aggregated monthly ESMF for all MCOs is transferred via the SDI to the Department's Medicaid Data Warehouse (MDW), and this data is used to create Limited Data Sets to help support the HERO for 1115 Waiver purposes. MCOs also receive

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<sup>1</sup> See Social Care Network: Program, Billing, and Data Governance Operations Manual available at [https://www.health.ny.gov/health\\_care/medicaid/redesign/sdh/scn/docs/operations\\_manual.pdf](https://www.health.ny.gov/health_care/medicaid/redesign/sdh/scn/docs/operations_manual.pdf)

Screening, Assessment and Referral data for their Medicaid Members via the SDI in support of the 1115 Waiver.

#### HERO's Role

The HERO is the Department's contracted entity to facilitate Medicaid related Healthcare Operations required under Section 13 of the Special Terms and Conditions (STCs) of the 1115 Waiver. The HERO is responsible for generating regional and statewide reports on 1115 Waiver initiatives required by the STCs, using aggregated or anonymized data (referred to herein as "Reports") through the SHIN-NY. The HERO works with Limited Data Sets created from ESMF and Screenings, Assessments and Referrals contributed to the SHIN-NY (collectively referred to herein as "SHIN-NY Limited Data Sets"). Per guidance from the Department, NYeC and its subcontractors are responsible for creating the SHIN-NY Limited Data Sets for creation of the Reports. All Reports are created solely for 1115 Waiver purposes.

#### HINs' Role (QEs and NYeC)

HINs are responsible for facilitating the flow of 1115 Waiver Data to and from the SDI and to and from 1115 Waiver Participants.

- QEs are designated by an SCN Lead Entity as Designated HINs through the SCPA.
- NYeC is the designee of the Department responsible for overseeing the SHIN-NY and for enabling data exchange through the SHIN-NY with or among QEs, SCN Lead Entities, MCOs, HINs, the Department, and the HERO to support services and reporting under the 1115 Waiver.

## Procedures

### I. Roles of 1115 Waiver Participants and the HINs

In accordance with the 1115 Waiver Guidance, all 1115 Waiver Participants and the HINS are mandated to adhere to the SHIN-NY data privacy and governance policies and guidelines issued by the Department.

#### A. SCN Lead Entities:

To operate within the 1115 Waiver, SCN Lead Entities must have contracts with the Department and MCOs and an executed SCPA (which will replace the QE Participation Agreement with SCN Addendum). All such contracts and agreements must include an appropriate Business Associate Agreement (BAA).

The Department's website contains a complete listing of SCN Lead Entities operating under the 1115 Waiver: [https://www.health.ny.gov/health\\_care/medicaid/redesign/sdh/scn/](https://www.health.ny.gov/health_care/medicaid/redesign/sdh/scn/).

#### B. MCOs:

To operate within the 1115 Waiver, MCOs must have contracts with the Department, SCN Lead Entities, and NYeC. All such contracts must include an appropriate Business Associate Agreement (BAA).

C. HERO:

To operate within the 1115 Waiver, the HERO must have a contract with the Department, a Value-Added Services Agreement with NYeC and an executed SCPA. All such contracts and agreements must include an appropriate Business Associate Agreement (BAA).

To access data from the SDI, the HERO must be an Authorized Requester under the SCPA. The SDUC approved United Hospital Fund of New York (UHF) and certain staff of UHF as Authorized Requesters on August 19, 2025.

D. HINs (QEs and NYeC):

In order for the SHIN-NY to facilitate the data flow components of the 1115 Waiver described in this SOP, the QEs must have a contract with one or more SCN Lead Entities and agreements with NYeC (e.g., QE Funding Agreement; Qualified Entity Participation Agreement).

To facilitate the data flow components of the 1115 Waiver described in this SOP, NYeC must have contract with a QE to facilitate data exchange with the MCOs, a contract with the MCOs, a contract with the HERO, and agreements with the QEs (e.g., QE Funding Agreement; Qualified Entity Participation Agreement).

All such contracts and agreements must include an appropriate Business Associate Agreement (BAA).

II. Access to the SHIN-NY and Access, Use and Disclosure of SHIN-NY Data by 1115 Waiver Participants

A. SCN Lead Entities' access to the SHIN-NY is strictly limited based on their designated role under the 1115 Waiver as follows:

1. Data Use Boundaries: Data accessed through SHIN-NY must be used solely for 1115 Waiver-related purposes. This includes:
  - a. Conducting Screenings of Medicaid Members.
  - b. Conducting Assessments of Medicaid Members. SCN Lead Entities may access SHIN-NY Patient Information only for the purpose of conducting Eligibility Assessments under the 1115 Waiver and as permitted by applicable laws, regulations, the SCPA, SHIN-NY SOPs, and 1115 Waiver Guidance.
  - c. Facilitating Referrals for Medicaid Members.
  - d. Supporting programs to address HRSNs as mandated by the 1115 Waiver.

- e. Any other use authorized by the SCPA, SHIN-NY SOPs or 1115 Waiver Guidance.
- 2. Data Contribution: SCN Lead Entities are required to Contribute Medicaid Members' 1115 Waiver Data, as required by the 1115 Waiver, to the SHIN-NY, including the SDI, by transmitting such SCN Data to a QE.
- 3. Data Standards and Quality: SCN Lead Entities are required to adhere to data and data quality standards as defined in SCPA, SHIN-NY SOPs and 1115 Waiver Guidance, including:
  - a. Coordinating with a QE(s) to establish a user process and technical means to obtain data from the SHIN-NY via a real-time API call to the SDI.
  - b. Ensuring the SCN IT Platform can display Medicaid Member files and flag eligibility (e.g., Member information, Enhanced Services eligibility).
  - c. Adopting consensus-based terminology and coding standards for social care and payment data including, but not limited to, LOINC codes, ICD-10 Z-codes, SNOMED-CT codes, HCPCS codes, CBO identifiers (e.g., TIN).
  - d. Meeting HL7 FHIR national standards for bi-directional data sharing and data transactions between the SCN Lead Entity and QE(s) in accordance with the SCPA, SHIN-NY SOPs and 1115 Waiver Guidance.
  - e. Aligning data quality standards and validation processes with existing federal and state data standards.
- 4. Protocols:
  - a. In accordance with the SCPA and as SHIN-NY Participants who are contributing to the SHIN-NY, SCN Lead Entities must meet the minimum set of interoperability and data sharing guidelines set forth in the SHIN-NY SOPs. The SHIN-NY Technical Advisory Committee (TAC) may from time to time make updates and modifications to SHIN-NY SOPs related to technical standards for interoperability and data sharing. Any such updates and revisions will be made in accordance with the Statewide Collaboration Process SOP.
  - b. SCN Lead Entity ensures that its access to data is consistent with the SCPA, the SHIN-NY SOPs and 1115 Waiver Guidance, and the 1115 Waiver Use Case.
- B. MCOs' access to the SHIN-NY is strictly limited based on their designated role under the 1115 Waiver as follows:
  - 1. Data Use Boundaries: 1115 Waiver Data (e.g. Screening, Eligibility Assessment and Referral Data) accessed through the SHIN-NY shall only be used to

support 1115 Waiver purposes authorized by the SHIN-NY SOPs and 1115 Waiver Guidance, the 1115 Waiver Use Case, and applicable law.

- a. MCOs shall ensure that any vendors that have access to 1115 Waiver Data comply with all applicable laws, agreements, and obligations regarding the access, use and disclosure of such data in accordance with the SHIN-NY SOPs and 1115 Waiver Guidance, the 1115 Waiver Use Case and applicable law.
  2. Data Contribution: MCOs are required to contribute the ESMF on a monthly basis to the SDI via NYeC or its subcontractor.
  3. Data Standards and Quality: MCOs are required to adhere to data quality and standards as defined in the SHIN-NY SOPs and 1115 Waiver Guidance.
  4. Protocols:
    - a. MCOs shall maintain systems for the secure handling, storage, and transmission of Screening, Eligibility Assessment and Referral Data consistent with the SHIN-NY SOPs and 1115 Waiver Guidance.
    - b. MCOs must meet the minimum set of interoperability and data sharing guidelines set forth in the SHIN-NY SOPs. The SHIN-NY TAC may from time to time make updates and modifications to technical standards for interoperability and data sharing. Any such updates and revisions will be made in accordance with the Statewide Collaboration Process SOP.
- C. HERO's access to the SHIN-NY and the SHIN-NY Limited Data Sets is strictly limited to its designated role under the 1115 Waiver as follows:
1. Data Use Boundaries:
    - a. The SHIN-NY Limited Data Sets accessed by the HERO through the SHIN-NY shall only be used to generate Reports as authorized by the 1115 Waiver Use Case and pursuant to the SHIN-NY SOPs and 1115 Waiver Guidance.
    - b. The HERO is prohibited from re-identifying or attempting to re-identify the information contained within SHIN-NY Limited Data Sets or otherwise contacting or attempting to contact the individual subject(s) of SHIN-NY Limited Data Sets. The HERO is required to ensure that any employee or agent to which SHIN-NY Limited Data Sets are provided shall not attempt to re-identify the information or contact the individual subject(s).
    - c. The HERO cannot directly or indirectly accept remuneration, financial or otherwise, as prohibited under 45 CFR §164.502(a)(5)(ii) and §164.508(a)(4) (prohibition on sale of PHI) and shall not use individually

identifiable information for marketing purposes that would require an authorization under §164.508(a)(3) (marketing).

- d. The HERO must ensure that any subcontractors agents to whom it provides SHIN-NY Limited Data Sets and/or PHI agree to the same restrictions and conditions that apply to the HERO with respect to such information.
2. Data Contribution: As the contracted entity to the Department, the HERO makes no contribution of data to the SHIN-NY.
3. Data Standards and Quality: As the contracted entity to the Department, the HERO is required to adhere to data quality and standards as defined in the SHIN-NY SOPs and 1115 Waiver Guidance.
4. Protocols:
  - a. All access and use of SHIN-NY Limited Data Sets must be documented and subject to routine oversight and monitoring and audits pursuant to the SCPA. Audit protocols are defined in the SCPA and the SHIN-NY SOPs to ensure transparency and accountability.
  - b. In accordance with the SCPA and as a SHIN-NY Participant with access to data in the SHIN-NY, the HERO must meet the minimum set of interoperability and data sharing guidelines set forth in the SHIN-NY SOPs. The SHIN-NY TAC may from time to time make updates and modifications to technical standards for interoperability and data sharing. Any such updates and revisions will be made in accordance with the Statewide Collaboration Process SOP.

## II. HINs' Roles in Supporting 1115 Waiver Participants

- A. QEs and their subcontractors may only access, use and disclose 1115 Waiver Data for the following purposes:
  1. Contributing 1115 Waiver Data to the SHIN-NY, including the SDI.
  2. Providing 1115 Data received from NYeC to SCN Lead Entity.
  3. Pursuant to the 1115 Waiver Use Case, disclosing encounter alerts to clinicians and care managers (in the same manner as clinical documents such as a discharge summary or lab result) that include 1115 Waiver Data from the SDI.
  4. Supporting activities related to the 1115 Waiver as required by NYSDOH and its contractors, and NYeC.
  5. Any other permitted use under the SCPA, SHIN-NY SOPs, and 1115 Waiver Guidance.



- B. QEs may only access, use and disclose ESMF Data for the purpose of transferring SCN-specific ESMF Data to the appropriate SCN Lead Entity for uses authorized by the SCPA, SHIN-NY SOPs and 1115 Waiver Guidance.
  - C. NYeC may only access, use and disclose 1115 Waiver Data for the following purposes:
    - 1. Supporting activities related to the 1115 Waiver as set forth in the 1115 Waiver Use Case and as may be further authorized via the SCPA, SHIN-NY SOPs and 1115 Waiver Guidance.
    - 2. Pursuant to the 1115 Waiver Use Case, facilitating QEs' ability to disclose encounter alerts to clinicians and care managers (in the same manner as clinical documents such as a discharge summary or lab result) that include 1115 Waiver Data from the SDI.
    - 3. Any other permitted use under the SCPA, SHIN-NY SOPs, and 1115 Waiver Guidance.
  - D. NYeC may only access, use and disclose ESMF Data for the following purposes:
    - 1. NYeC shall aggregate monthly ESMF Data from all participating MCOs across the state to create a comprehensive ESMF dataset for all regions of the state. NYeC will then transfer this aggregated dataset to the Department's Medicaid Data Warehouse.
    - 2. NYeC shall further refine the aggregated ESMF Data into SCN-region specific ESMF datasets to be provided to each SCN Lead Entity for its region via the HINs.
    - 3. Supporting activities related to the 1115 Waiver as set forth in the 1115 Waiver Use Case and as may be further authorized via the SCPA, SHIN-NY SOPs and 1115 Waiver Guidance.
    - 4. In order to create Limited Data Sets to support the HERO, NYeC will create a Pseudonymized Linkage Identifier Key (PL Identifier Key) that can be used to generate additional data sets for the HERO to use. NYeC can share the PL Identifier Key with the HERO's subcontractor for purposes of the 1115 Waiver. The HERO's subcontractor can use the PL Identifier Key to create additional datasets for the HERO for 1115 Waiver purposes. Such additional data sets are derived from the same individual patient while keeping that patient's identity hidden.
- III. Prohibited Uses of 1115 Waiver Data, ESMF Data, SHIN-NY Limited Data Sets and SHIN-NY Data

In accordance with the SCPA, SCN Data, ESMF Data, SHIN-NY Limited Data Sets and SHIN-NY Data accessed via the SHIN-NY may not be used by HINS and the 1115 Waiver Participants and/or their vendors and/or contractors for the following Prohibited Purposes:

- A. The sale of individually identifiable information (including but not limited to PHI);
- B. The use of individually identifiable information for marketing purposes that would require an authorization under 45 C.F.R. § 164.508(a)(3);





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### SOP for 1115 WAIVER PARTICIPANTS' USE OF THE SHIN-NY

- C. Any purpose prohibited by applicable law; and
- D. Other purposes as set forth in the SHIN-NY SOPs.

### Amendment Procedures

This SOP shall be reviewed and evaluated by NYeC staff at least once annually to ensure its terms remain consistent with applicable New York State laws and regulations, and appropriate for the needs of the SHIN-NY. SHIN-NY stakeholders may submit proposals to amend this SOP addressed to NYeC staff for consideration. Proposals to amend this SOP shall be considered by the SDUC, the NYeC Board and the Department. All amendments to this SOP shall be documented in the Version History section and published according to the practices described in the Statewide Collaboration Process – SHIN-NY SOP. NYeC will post or otherwise make the amended SOP available to the public.

### Version History

| Version Number | Date Adopted | Summary of Action/Changes                |
|----------------|--------------|--|
| 1.0            | 10/20/2025   | Approved by Statewide Data Use Committee |
|                | 11/18/2025   | Approved by NYeC Board                   |
|                | 12/8/2025    | Approved by NYS Department of Health     |