

PARTNERSHIP FOR ACHIEVING TOTAL HEALTH

Greater New Orleans Health Information Exchange

Section: HIPAA		Subject: USER ACCESS CONTROL POLICY		
Controls Addressed:	Regulations	Controls		
	Security (A)	45 CFR 164.308(a)(4) , 45 CFR 164.502(b) , 45 CFR 164.514(d)		
Applies to: <input type="checkbox"/> LPHI <input checked="" type="checkbox"/> PATH <input type="checkbox"/> Business Partner		Effective from: 5-20-2014	Revised on: 10-22-2019	Page 1 of 4
Approved: 11/2019				

I. PURPOSE

The User Access Control Policy aims to ensure that the GNOHIE, which is administered by PATH, and its participating members (the “Participant” or “Participants”) comply with all applicable laws in allowing Authorized Users (as defined in definitions, and Terms and Conditions) to view protected health information. This policy also reinforces adherence to the HIPAA Security Rule [45 CFR Part 160 and Subparts A and C of Part 164] for e-PHI. Establishing protocols related to Authorized User access of PHI is essential to build trust among members and remain in compliance with federal and state laws.

II. SCOPE

This policy applies to use of the GNOHIE and the data stored within the GNOHIE by Participants and the transmission of e-PHI from Participants to the GNOHIE.

III. POLICY STATEMENT

- 1) It is the responsibility of Participant to notify the GNOHIE Administrator indicating which of their designated personnel has authorized access to the Portal and which level of Access Control.
- 2) The GNOHIE shall periodically, or upon request, provide a user access log to the Participant, and it is the responsibility of the Participant to notify PATH of an occurrence of misuse or accounts that should be suspended or revoked.
- 3) Each Participant shall notify their account manager or GNOHIE Administrator within seven (7) business days of an Authorized User who is no longer employed or contracted by the respective Participant.

- 4) Currently all Authorized Users are granted access to all sites with the exception of some organizations that provide the following services:
 - Substance Use Disorder (SUD) services
 - Behavioral Health (BH) services
- 5) The transmission of e-PHI by Participants to the GNOHIE shall be HIPAA-compliant.
- 6) To aid in the HIPAA-compliant transmission of e-PHI by Participants, Direct Mail accounts shall be created for all Participants, unless they have their own Direct Mail account or another HIPAA compliant method for transmitting e-PHI.
- 7) In the absence of other HIPAA-compliant modes for transmitting e-PHI, Direct Mail shall be the default mode for transmitting e-PHI.
- 8) Authorized Users can Break the Glass on patients that have an unknown consent status. This process can only be done within the Portal, and is not a supported feature for encounter notifications. By Breaking the Glass the Portal Authorized User must select a reason for doing so from the drop down menu. By Breaking the Glass an audit trail is automatically created, which may be used for portal use auditing.
- 9) A patient's consent status affects the ability of the GNOHIE to send hospital encounter notifications to a Participant. The following table outlines the notification rules:

Consent Status	Receive ED/IP alert	View Patient Info in GNOHIE	Option to Break the Glass
Opt in	Yes	Yes	Not needed
Opt out	No	No	Not available
No consent status	No	Yes	Yes

Definitions:

Access Control: defines what data an Authorized User can see within the GNOHIE.

- Level 1 Access Control includes clinical and demographic information.
- Level 2 Access Control only includes demographic information.

Audit: defines the ability of GNOHIE Administrators, or other business associates, may inspect and review any or all user access logs for any reason, including but not limited to the following:

- Breaking The Glass;
- Participant requests;
- patient complaints; and
- GNOHIE user access review.

Authorized User(s): means a Participant or an individual who has been authorized by a Participant to access data via the GNOHIE in accordance with the Terms and Conditions and the Policies and Procedures listed on the GNOHIE website. Additionally, an Authorized User must fill out a Portal User Agreement before a user account will be created.

Breaking the Glass: is defined as when a user with appropriate Authorized User Access Control level privileges attempts to view the records of a patient with an over-ridable opt-out consent setting, the Authorized User is presented with a screen that allows the Authorized User to specify the reason is for breaking the glass. Once the user fills in this information and clicks 'Submit', the patient data is displayed. Breaking the Glass is an event that is recorded in the Authorized User access log indicating that an Authorized User Broke the Glass and the specified reason for access.

Direct Mail (or Direct Protocol): is a technical standard method for exchanging health information between health care entities within a trusted network. Direct Mail is approved for use by nationally recognized experts and organizations. Direct Mail functions like regular e-mail with additional security measures to ensure that messages are only accessible to the intended recipient, per the protection regulations of the Health Insurance Portability and Accountability Act (HIPAA).

ePHI: refers to electronic protected health information.

Encounters: are documented interactions between patients and providers. When a patient presents to a PATH member organization for medical care and medical care is provided, the information is populated into GNOHIE.

GNOHIE: means the Greater New Orleans Health Information Exchange.

GNOHIE Administrator: is a GNOHIE employee that administers and grants access to Participant's employees, who are designated Authorized Users.

PATH: means Partnership to Achieving Total Health and is the managing organization of the GNOHIE.

PHI: refers to protected health information.

Portal: refers to the web-based system an Authorized User may log into to access PHI through and of the GNOHIE. The Portal is the technical infrastructure of the GNOHIE utilized by Authorized Users and GNOHIE Administrators.

Portal User Agreement: is a form that an individual from a Participant organization fills out in order to receive a user account and access to the GNOHIE.

Provider: is a person working for a Participant who provides health care to patients on behalf of the Participant.

Site: is the location where a Provider treats patients and where data may originate to populate the GNOHIE.

Source: is the originator of data, usually patient data, e.g. a particular clinic or hospital.

IV. ASSOCIATED POLICIES / AGREEMENTS

- Member BAA
- Uses and Disclosure of PHI With a Valid Authorization
- Portal User Agreement
- Patient Consent Policy
- Opt-out Consent Attestation
- Breach Notification Policy
- Portal User Agreement
- Data Use, Retention and Disclosure Policy