

POLICIES AND PROCEDURES
TOPIC: User Authorization
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I. BACKGROUND AND PURPOSE

The purpose of this policy is to establish a process for determining which individuals are authorized to access the WVHIN’s Health Information Exchange. This policy will describe how such authorization will be based upon the roles of individuals in the Workforce of a Participating Organization, or as a Patient who has registered for access to the WVHIN’s Patient Portal with his or her cooperating Participating Organization for direct access to the Patient’s Protected Health Information through the WVHIN.

II. POLICY

The Health Information Exchange operated by the WVHIN offers the hope of better coordinated and higher quality health care to Patients. The principles underlying a Health Information Exchange do not assume, however, that any individual who is a member of the Workforce at the WVHIN, at a Business Associate of the WVHIN, or at a Participating Organization should be able to log-in to the WVHIN to access, use, and disclose Protected Health Information. This type of unrestricted access would only lead to chaos, and the ultimate disintegration of the privacy and security of Protected Health Information.

Instead, the WVHIN must strictly control access to its systems through an organized and workable system of designating Authorized Users. This system will be based upon the roles fulfilled by individuals in the workplace - at the WVHIN, at the WVHIN’s Business Associates, and at Participating Organizations. This system, known as role-based access control, grants membership in roles based upon an individual’s competencies and responsibilities within an organization. Access rights are grouped and limited by role. The functions that an Authorized User is permitted to perform are also based upon an Authorized User’s role. The Authorized User’s role will ultimately dictate how much Protected Health Information can be made available to him or her. Except when involved in the provision of Treatment, an Authorized User should only be given access to the minimum amount of Protected Health Information necessary to perform his or her role.

Each Participating Organization shall, through its Site Administrator, implement a role-based access system based upon these principles. Authorized Users may include only those members of the Participating Organization’s Workforce who require access to the Health Information Exchange to facilitate the use and disclosure of Protected Health Information for a Permissible Purpose as part of their job responsibilities. At a minimum, the roles designated by

the Site Administrator will differentiate between members of the Workforce who fulfill clinical roles, and members of the Workforce who fulfill clerking and related administrative roles. All Authorized Users must complete a training program about the proper use and functionality of the Health Information Exchange.

A System Administrator is one formal role recognized by the WVHIN. A System Administrator will be authorized to access the WVHIN to perform multiple administrative functions available on the WVHIN's Health Information Exchange. This broad scope of authority will also include the ability to perform audits and to check audit logs throughout the entire system, to establish system preference and default settings, to run security checks, and to add or subtract system applications and programs. A very limited number of individuals will be granted this advanced level of authorization. Only those individuals who are members of the Workforce of the WVHIN, or members of the Workforce of a Business Associate of the WVHIN, are eligible to be designated as an Authorized User –System Administrator.

A Site Administrator is another formal role recognized by the WVHIN. A Site Administrator will be authorized to access the WVHIN to perform certain administrative functions at the level of the Participating Organization. These functions will include the ability to grant and terminate Authorized User Status, to grant and terminate Authentication Information, and to perform audits and check audit logs related to access of the WVHIN from within the Participating Organization. A Participating Organization Administrator may not submit an Inquiry, however. A very limited number of individuals will be granted this level of authorization at each Participating Organization. Only those individuals who are members of the Workforce of the Participating Organization are eligible to be designated as a Site Administrator.

It is the responsibility of each Participating Organization to identify and verify its Authorized Users. Identifying information for each Authorized User must be provided to the WVHIN. A Participating Organization may include on its list of designated Authorized Users only those individuals on its Workforce who require access to the WVHIN to perform their roles within the organization for a Permissible Purpose recognized by the WVHIN. Its Workforce will include employees, volunteers, and other persons whose work performance is under the direct control of the Participating Organization, regardless of whether they are paid by the Participating Organization. Its Workforce does not include independent contractors or Licensed Practitioners whose only relationship to the Participating Organization is as a credentialed medical staff member, except that a Participating Organization may designate any Licensed Practitioner who has a Treatment relationship with a Patient at its facilities as an Authorized User.

A Participating Organization is responsible for updating, amending or terminating the status of its Authorized Users. This means that changes in employment as well as other changes to the status of the Participating Organization's Workforce affecting one or more Authorized Users must be communicated immediately to the WVHIN. A Participating Organization's Site Administrator must immediately and electronically amend or terminate an Authorized User's status if he or she no longer has a need to access the WVHIN on behalf of the Participating Organization.

A Patient can become an Authorized User of the WVHIN only if the Patient registers for access to the WVHIN's Patient Portal through a Participating Organization offering such service.

III. PROCEDURES

A. Patient Responsibilities.

1. A Patient will only be able to access the WVHIN directly as an Authorized User if the Patient registers for access to the WVHIN's Patient Portal.

2. If a Patient chooses to register for access to the WVHIN's Patient Portal on the WVHIN, he or she may do so through a Participating Organization. The Patient must register and be approved for Patient Portal access through his or her cooperating Participating Organization.

3. If a Patient wants to register his or her Patient Portal on the WVHIN through his or her Participating Organization, and in the process become an Authorized User for the purpose of his or her Patient Portal, the identity of the Patient must be verified and authenticated by the Participating Organization.

4. Once a Patient's identity has been verified and authenticated by the Participating Organization, the Patient will then complete the registration process to obtain a Patient Portal on the WVHIN, including the execution of a Patient Portal Agreement. This registration process may be accomplished with paper forms signed by the Patient manually, or with an electronic form signed by the Patient electronically.

B. Participating Organization Responsibilities.

1. Before a Participating Organization can designate its Authorized Users to the WVHIN, the Participating Organization must first execute a Participating Organization Agreement with the WVHIN.

2. After executing a Participating Organization Agreement, the Participating Organization must properly verify and designate a list of its Authorized Users from its Workforce in accordance with this Policy, including but not limited to, the principles of role-based access. At a minimum, the roles designated by the Site Administrator will differentiate between members of the Workforce who fulfill clinical roles, and members of the Workforce who fulfill clerking and related administrative roles.

3. The Participating Organization will provide the WVHIN with such information as the WVHIN deems necessary to individually identify each Authorized User of the Health Information Exchange designated by a Participating Organization.

4. A Participating Organization may include on its list of designated Authorized Users only those individuals on its Workforce who require access to the WVHIN to perform their roles within the organization for a Permissible Purpose recognized by the WVHIN.

5. Any individual member of the Participating Organization's Workforce who is not designated as an Authorized User must not be allowed to access the WVHIN for any purpose.

6. Each Participating Organization will implement a training program for its Authorized Users in the proper use and functionality of the WVHIN's Health Information Exchange. This training program will include a detailed review of all Policies and Procedures maintained by the WVHIN.

7. A Site Administrator or an Authorized User must immediately report any violation of this User Authorization Policy to the WVHIN. If necessary to prevent imminent harm, the Participating Organization's Site Administrator will lock out the Authorized User in question from the WVHIN. This lock out will be terminated after the nature of the violation has been investigated and remedial steps have been taken by the WVHIN or the Participating Organizations to ensure future compliance with this Policy. For purposes of this Policy and Procedure, the term "immediately" means within the same business day.

8. A Participating Organization is responsible for keeping its list of Authorized Users up-to-date and current. This means that changes in employment as well as other changes to the status of the Workforce affecting an Authorized User of a Participating Organization must be communicated immediately to the WVHIN by the Site Administrator. Contemporaneous with such communication, the Participating Organization's Site Administrator will lock out the former Authorized User in question from the WVHIN.

9. A Participating Organization's Site Administrator must immediately and electronically amend or terminate an Authorized User's status if it determines that an Authorized User's status has changed, or an Authorized User no longer has a need to access the WVHIN on behalf of the Participating Organization.

10. A Participating Organization and its Site Administrator will be wholly responsible for assigning role-based access to the Health Information Exchange and for maintaining an appropriate and up-to-date list of its Authorized Users.

11. If access to the WVHIN's Patient Portal is offered by a Participating Organization, A Participating Organization will be required to verify and authenticate a Patient for direct access to his or her Protected Health Information through the WVHIN's Health Information Exchange.

12. In accordance with WVHIN policies and procedures, a Participating Organization is permitted to develop internal processes to verify and authenticate a Patient for direct Patient Portal access.

C. WVHIN Responsibilities.

1. The WVHIN will provide outreach, educational materials, and where requested, technical assistance to Business Associates and Participating Organizations in the training of its Authorized Users to ensure compliance with all Policies and Procedures maintained by the WVHIN.

2. The WVHIN must properly designate a list of Authorized Users from its Workforce in accordance with this Policy and Procedures for User Authorization.

3. In addition, the WVHIN must require any of its Business Associates and Participating Organizations to properly designate a list of Authorized Users from their respective Workforces in accordance with this Policy and Procedures for User Authorization.

4. The WVHIN will deny access to its Health Information Exchange to any Business Associate until the WVHIN is in receipt of an executed Business Associate Agreement developed and approved by the WVHIN.

5. The WVHIN will deny access to its Health Information Exchange to any Participating Organization until the WVHIN is in receipt of an executed Participation Agreement developed and approved by the WVHIN.

6. The WVHIN must necessarily rely upon the role based access designations made by its Business Associates and Participating Organizations for Authorized Users.

7. The WVHIN will immediately lock out any of its or its Business Associates' Authorized Users who are reported to have violated this Policy. This lock out will be terminated after the nature of the violation has been investigated and remedial steps have been taken by the WVHIN or the Business Associate to ensure future compliance with this Policy.

8. The WVHIN will maintain an up-to-date record of all Authorized Users who may access the WVHIN based upon information provided by its Business Associates and Participating Organizations.

9. The WVHIN reserves the right to terminate any individual's status as an Authorized User for good cause, including but not limited to, any fraudulent activity or other activity that constitutes a repeated and ongoing violation or abuse of this Policy.

10. The WVHIN may automatically lock out an Authorized User who is not a Patient if he or she has not accessed the WVHIN at any time during the prior 6 months.

11. The WVHIN may automatically lock out an Authorized User who is a Patient if he or she has not accessed the WVHIN at any time during the prior 6 months.