

TITLE: STAFF ACCESSING PERSONAL RECORDS THROUGH CCHIE	
STATUS: FINAL	EFFECTIVE DATE: August 16, 2016
VERSION: 8	PAGE: 1 OF 2

I. PURPOSE

It is the policy of ClinicalConnect HIE (CCHIE) to allow its Participants to dictate whether its staff members can access their personal medical records through CCHIE.

II. OVERVIEW

CCHIE is a Business Associate and is not afforded the same rights when it comes to accessing data within the CCHIE repository because CCHIE does not own the data. Therefore, each participant shall determine whether its staff members can access their personal medical records through CCHIE.

III. SCOPE

The policy applies to CCHIE Participants.

IV. DEFINITIONS

“Business Associate” shall have the same meaning set forth in 45 C.F.R. § 164.502 of the HIPAA Regulations.

“Covered Entity” shall have the same meaning set forth in 45 C.F.R. § 164.502 of the HIPAA Regulations.

“Participant” is an organization (including physician practice) that has signed a Data Exchange Agreement with the CCHIE.

V. POLICY

- A. CCHIE’s Participants will have the responsibility to determine whether their staff may access their personal medical health records through CCHIE. It is the responsibility of the Participant to establish policies and to provide training to reflect whether staff are afforded such access.
- B. At any time, a Participant can request an audit of a user’s activities from CCHIE per CCHIE’s “Participant-Requested Audit Process.”

- C. As a Business Associate, CCHIE's staff and its vendors are not allowed to access their personal records through CCHIE per Policy "Accessing Unauthorized Patient Records" except to the extent that it may be necessary to complete their job.

VI. Revision History

DATE	AUTHOR	COMMENTS
7/26/2016	Jones	Creation of the policy
9/13/2016	Jones/Szymanski	Reviewed policy – no changes
12/17/2019	Dukes	Minor revisions – no major changes
12/30/2020	Onyshko	Reviewed policy – no changes
11/15/2021	Dukes	Updated font format to title and referenced procedure(s).
1/6/2023	Dukes	Reviewed policy – no changes
12/26/2024	Dukes	Clarified in section C that access
1/7/2026	Dukes	Minor Grammatical Update