

TITLE: STAFF ACCESSING PERSONAL RECORDS THROUGH CCHIE	
STATUS: FINAL	EFFECTIVE DATE: August 16, 2016
VERSION: 5	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 is 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.”

VI. Revision History

DATE	AUTHOR	COMMENTS
07/26/2016	Erika Jones	Creation of the policy
09/13/2016	Jones/Szymanski	Reviewed policy – no changes
12/17/2019	Keith Dukes	Minor revisions – no major changes
12/30/2020	Joanne Onyshko	Reviewed policy – no changes
11/15/2021	Keith Dukes	Updated font format to title and referenced procedure(s).