

TITLE: PERMITTED DATA USE POLICY	
STATUS: FINAL	EFFECTIVE DATE: May 9, 2014
VERSION: 2	PAGE: 1 OF 2

I. PURPOSE

It is the policy of ClinicalConnect HIE to ensure Participants appropriately use protected health information (PHI) consistent with applicable laws and regulations. This policy establishes the permitted uses of data available within the ClinicalConnect HIE

II. SCOPE

ClinicalConnect HIE staff and its Participants

III. DEFINITIONS

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

“Protected Health Information” or “PHI” shall have the same meaning as set forth in HIPAA.

IV. POLICY

- A. ClinicalConnect HIE shall enter into a Data Exchange Agreement with each Participant.
- B. The following permitted uses for ClinicalConnect patient data are outlined in the Data Exchange Agreement.
 - 1. Treatment by the Participant of the individual who is the subject of the PHI
 - 2. Payment Activities by the Participant
 - 3. Health Care Operations of Participant
 - 4. Public Health Activities and Reporting by Participant
 - 5. Meaningful Use Reporting

6. Other uses authorized by the individual who is the subject of the PHI
- C. Each and every other use of patient data (i.e., “non-permitted purposes”) shall be on approval of the ClinicalConnect Board of Directors.
 - D. Participant is responsible for determining what PHI it transmits to the ClinicalConnect HIE, and shall ensure that such PHI may be exchanged with other Participants based on Federal and State law. ClinicalConnect HIE shall not be accountable for determining what PHI is disclosed to Participants.
 - E. Participant shall require that its users only use the ClinicalConnect PHI for a permitted use. Participant shall take appropriate disciplinary action for users who inappropriately use PHI and shall report such inappropriate access or use to ClinicalConnect HIE.
 - F. In the event that ClinicalConnect HIE is informed of an inappropriate access or use of PHI, in conjunction with the Participants in question, ClinicalConnect HIE shall perform a preliminary investigation to determine if a Participant or user has inappropriately accessed or used PHI. In the event that ClinicalConnect HIE determines that inappropriate access or use of PHI has occurred, ClinicalConnect HIE shall work with the Participants to take such actions as are required by law, and shall notify the ClinicalConnect HIE Board of Directors.

V. Revision History

DATE	AUTHOR	COMMENTS
5/9/14	Jacqueline Smith	Creation of the policy
1/28/16	Erika Jones	Updated the Template
4/1/17	Keith Dukes	Reviewed Policy – No Changes