

TITLE: PRODUCTION DATA IN NON-PRODUCTION ENVIRONMENTS	
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VERSION: 3	PAGE: 1 OF 2

I. PURPOSE

It is the policy of ClinicalConnect HIE (CCHIE) to not store, process, or transmit Confidential Production Data in Non-Production Environments.

II. SCOPE

This policy applies to CCHIE, its Participants, and service providers.

III. DEFINITIONS

“Confidential Production Data” is data that identifies real patients, including PHI and demographics.

“Non-Production Environment” is any environment that is not a Production, or “Live” Environment. Non-production Environments include “Development,” “Test,” and “Stage” Environments.

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

“Pre-production Environment” is the environment utilized prior to moving to the Production Environment.

“Production Environment” is the “Live” environment that is used by the end users.

IV. POLICY

A. CCHIE will not store, process, or transmit Confidential Production Data in Non-Production Environments.

B. If CCHIE discovers production data in a Non-Production Environment, CCHIE will do its due diligence to notify the source of the information of the violation of this policy. The parties will work together to remove the Confidential Production Data in way that is technically feasible as soon as possible.

1. In the event it is not technically feasible to remove the production data from the Non-Production Environment, the non-production environment will be held to the same strict security and privacy policies and standards as a Production Environment. However, such Non-Production Environment shall only be accessed by CCHIE staff, its Participants, and service providers as is strictly necessary for the purpose of testing.

C. In certain instances of Pre-production Environment testing in which production data is needed in a non-prod environment, the Pre-production Environment will be held to the same strict security and privacy policies and standards as the Production Environment. The Non-Production Environment shall only be accessed by CCHIE, its Participants, and service providers as is strictly necessary for the purpose of testing.

V. Revision History

DATE	AUTHOR	COMMENTS
06/23/2016	Erika Jones	Creation of the policy
08/03/2020	Keith Dukes	Minor Changes/Updated Format
10/04/2021	Keith Dukes	Reviewed Policy – New Changes