

TITLE: PERMITTED DATA USE POLICY	
STATUS: FINAL	EFFECTIVE DATE: May 9, 2014
VERSION: 8	PAGE: 1 OF 2

I. PURPOSE

It is the policy of ClinicalConnect HIE (CCHIE) 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 CCHIE.

II. SCOPE

CCHIE employees and its Participants.

III. DEFINITIONS

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

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

IV. POLICY

A. CCHIE shall enter into a Data Exchange Agreement with each Participant.

B. The following permitted uses for CCHIE 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 CCHIE Board of Directors.
- D. Participant is responsible for determining what PHI it transmits to the CCHIE and shall ensure that such PHI may be exchanged with other Participants based on Federal and State law. CCHIE shall not be accountable for determining what PHI is disclosed to Participants.
- E. Participant shall require that its users only use the CCHIE 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 CCHIE.
- F. In the event that CCHIE is informed of an inappropriate access or use of PHI, in conjunction with the Participants in question, CCHIE shall perform a preliminary investigation to determine if a Participant or user has inappropriately accessed or used PHI. In the event that CCHIE determines that inappropriate access or use of PHI has occurred, CCHIE shall work with the Participants to take such actions as are required by law and shall notify the CCHIE Board of Directors.

V. Revision History

DATE	AUTHOR	COMMENTS
05/09/2014	Jacqueline Smith	Creation of the policy
01/28/2016	Erika Jones	Updated the Template
04/01/2017	Keith Dukes	Reviewed Policy – No Changes
09/25/2019	Keith Dukes	Updated Format – Only Minor Changes
07/27/2020	Keith Dukes	Reviewed Policy – Only Minor Grammar Corrections
10/04/2021	Keith Dukes	Reviewed Policy – No Changes
07/01/2022	Keith Dukes	Updated Formatting
09/13/2022	Keith Dukes	Reviewed Policy – Only Minor Grammar Corrections
11/07/2023	Keith Dukes	Reviewed Policy – No Changes