

TITLE: Staff Accessing Personal Records Through ClinicalConnect	
STATUS: FINAL	EFFECTIVE DATE: August 16, 2016
VERSION: 1	PAGE: 1 OF 2

I. PURPOSE

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

II. OVERVIEW

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

III. SCOPE

The policy applies to ClinicalConnect HIE 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 ClinicalConnect HIE.

V. POLICY

- A. ClinicalConnect HIE’s Participants will have the responsibility to determine whether their staff may access their personal medical health records through ClinicalConnect HIE. 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 ClinicalConnect HIE per ClinicalConnect HIE's "[Participant-Requested Audit Process](#)."
- C. As a Business Associate, ClinicalConnect HIE staff and its vendors are not allowed to access their personal records through ClinicalConnect HIE per Policy "[Accessing Unauthorized Patient Records](#)."

VI. Revision History

DATE	AUTHOR	COMMENTS
7/26/16	Erika Jones	Creation of the policy
9/13/16	Jones/Szymanski	Reviewed policy – no changes