

TITLE: PARTICIPANT RESPONSIBILITY POLICY	
STATUS: FINAL	EFFECTIVE DATE: July 28, 2014
VERSION: 2	PAGE: 1 OF 3

I. PURPOSE

It is the policy of ClinicalConnect HIE to limit and control how Participants access the HIE. This policy describes the responsibilities of the ClinicalConnect HIE Participants for ensuring their workforce members only have access to the minimum amount of patient data necessary to do their assigned work duties.

II. SCOPE

ClinicalConnect HIE staff and its Participants

III. DEFINITIONS

“Authorization” shall have the same meaning and include the requirements set forth at 45 CFR § 164.508 of the HIPAA regulations and include any similar but additional requirements under Applicable Law.

“eHealth Exchange”, formerly known as the *Nationwide Health Information Network* and often abbreviated as the *NHIN* or *NwHIN*, shall mean a group of organizations with a common mission and purpose to improve patient care, streamline disability benefit claims, and improve public health reporting through secure, trusted, and interoperable health information exchange.

“The Sequoia Project”, formerly known as “Healthway”, shall mean the non-profit organization responsible for operating the eHealth Exchange.

“PA Patient and Provider Network” also known as “P3N,” is the network that supports the ability of healthcare participants to exchange information within and beyond Pennsylvania’s borders.

“Patient in Context” shall mean the patient currently being viewed in the Participant’s EHR by the Workforce Member.

“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.

“Workforce Member” shall mean employees, volunteers, trainees, and other persons whose conduct, in the performance of work for a covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity.

IV. POLICY

- A. Participants shall create accounts within their EHR for Workforce Members and assign roles that will link to roles within the ClinicalConnect HIE, thereby granting appropriate access to ClinicalConnect HIE patient data. Participants shall authenticate all workforce members prior to access being granted to the ClinicalConnect HIE and log all workforce member access after it is granted.
- B. Participants shall have policies and procedures in place consistent with all statutes and regulations that govern the access of their workforce members and their ability to access the ClinicalConnect HIE.
- C. Participants shall only access the ClinicalConnect HIE by launching from their clinical system (EHR) with a Patient in Context to initialize the connection to ClinicalConnect HIE. Participant shall have previously transmitted a registration message to ClinicalConnect HIE for the patient that they access.
- D. ClinicalConnect HIE shall prevent Participants from directly searching for the existence of patient information in the ClinicalConnect HIE independent of launching from their clinical system.
- E. ClinicalConnect HIE shall develop and maintain roles with varying levels of access to ClinicalConnect patient information. ClinicalConnect HIE shall review the established roles annually to determine if revisions are necessary to accommodate changes in access requirements, technology, standards and laws.
- F. Participants shall assign workforce members to the role that grants the minimum level of access necessary.
- G. Participants that request data through the eHealth Exchange network or the P3N network shall have a corresponding reciprocal duty to respond to requests for data by other eHealth Exchange and P3N participants.
- H. Participants shall reasonably cooperate with ClinicalConnect HIE, any other eHealth Exchange participants, and P3N Participants to resolve any issues related to the eHealth Exchange Data Use and Reciprocal Support Agreement and P3N Participant Agreement.

V. Revision History

DATE	AUTHOR	COMMENTS
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7/28/14	Jacqueline Smith/Phyllis Szymanski	Creation of the Policy
12/28/15	Erika Jones	Update the template/change name of policy
5/25/16	Erika Jones	Included the P3N
4/3/17	Dianne Clark	Updated Healthway name change to The Sequoia Project