

Kansas Department of Health and Environment

POLICIES AND PROCEDURES

P&P 05: User Access

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Date Reviewed: 03/01/2017
Date Updated: 05/09/2017

Purpose:

To identify the requirements for an approved HIO with respect to permitting a Participant to grant an individual status as a User.

Policy:

- 1) An approved HIO shall establish and communicate to Participants specific role classifications to which a Participant may assign Users and the specific system permissions associated with each such classification.
- 2) An approved HIO shall maintain and adhere to written procedures setting forth the specific requirements a Participant must satisfy to grant User status to an individual employed by or contracting with a Participant. An approved HIO shall require in its Participation Agreement that a Participant adhere to such procedures with respect to all Users.
- 3) At a minimum, the aforementioned procedures shall include the following requirements:
 - a) Prior to granting User status to an individual, a Participant shall provide the individual with sufficient training regarding the appropriate use of electronic health information exchange. An approved HIO shall make available to each Participant workforce training materials for such purposes.
 - b) Prior to granting User status to an individual, a Participant shall secure and deliver to the approved HIO appropriate documentation of the individual's personal agreement to comply with the Participation Agreement's terms and conditions in accessing the approved HIO for purposes of electronic health information exchange ("User Agreement").
 - c) Upon granting User status to an individual, a Participant shall assign the individual to a single specific role classification. A Participant shall re-assign such classification as necessary based on changes in the individual's position or job responsibilities.
 - d) A Participant shall enforce the terms of such User Agreement with respect to each User.
 - e) A Participant shall immediately terminate a User's access to the approved HIO upon (i) termination of the User's association with the Participant; (ii) the User's material breach of the User Agreement; or (iii) direction from the approved HIO.

- f) A Participant (and/or an approved HIO) shall assign a unique User ID to each individual who is granted User status (i.e., no shared or re-used User IDs).
- g) Except for purposes of secondary data use as specifically approved by KDHE, an approved HIO shall require that a Participant not authorize any User to access any individual's PHI through the approved HIO for any purpose other than treatment, payment, and health care operations in compliance with the HIPAA Privacy Rule including, but not limited to, adherence to the minimum necessary rule in accessing information through the HIO for purposes of payment or health care operations.