

 SACVALLEY MEDSHARE	POLICY: <i>Workforce, Agents, and Contractors</i>	POLICY NUMBER: SVMS-11.002
Compliance Requirement	Author: Elizabeth L Steffen	Origination Date: 01/15/2015
45 C.F.R. § 164.530(a),(b),(d),(e)	Revised By: Elizabeth L Steffen	Revised Date: 12/18/2015

Purpose and Principles:

The purpose of the Workforce, Agents, and Contractors policy is to ensure that the privacy principles of use limitation, security safeguards and controls, accountability and oversight, data integrity and quality, proper training, and remedies are practiced by Participants workforce, agents, and contractors as well as for the workforce, agents, and contractors of SacValley MedShare.

Scope and Accountability:

This policy applies to all Participants that have registered with and are participating with SacValley MedShare and those that may provide, make available, or request health information through the SacValley MedShare.

Policy Statement:

Access to System. Participants shall allow access to the SacValley MedShare (SVMS) Health Information Exchange (HIE) only by those workforce members, agents, and contractors who have a legitimate and appropriate need to use the HIE and/or release or obtain information through the HIE. No workforce member, agent, or contractor shall be provided with access to the HIE without first having been trained.

Training. Participants shall develop and implement a training program for its workforce members, agents, and contractors who will have access to the HIE to ensure compliance with SVMS policies And minimum training standards established by SVMS.

Responsibility for Maintaining Compliance. Participants remain responsible for ensuring compliance of their workforce, agents, and contractors in accordance with HIPAA

Reporting of Non-Compliance. Participants shall have a mechanism for, and shall encourage, all workforce members, agents, and contractors to report any non-compliance with these Policies to the Participant. Each Participant also shall establish a process for individuals whose health information is included in the HIE to report any non-compliance with these Policies or concerns about improper disclosures of information about them. The Participant shall promptly report to SVMS any non-compliance that results in a breach of the Participant’s Participation Agreement, these Policies, or any applicable laws or regulations.

Enforcing Business Associate Agreements and Contractor Agreements. Participants shall require in any relationship with business associates, contractors, or other third party (which may include staff physicians) that will result in such third party becoming an authorized user on behalf of the participant, or that will result in members of the workforce of such third party becoming an authorized user on behalf of the Participant, thatSuch third party and any member of its workforce shall be subject to these policies when accessing, using, or disclosing information through the HIE.