

 <b>SACVALLEY MEDSHARE</b>	<b>POLICY:</b> <i>Authentication of System Users</i>	<b>POLICY NUMBER:</b> <i>SVMS-13.001</i>
<b>Compliance Requirement</b>	<b>Author:</b> Elizabeth L Steffen	<b>Origination Date:</b> 01/14/2015
<b>ISO 15408</b> <b>45 CFR § 162.404(a), 410</b>	<b>Revised By:</b> Elizabeth L Steffen Dr. Kevin Dorsey-Tyler	<b>Revised Date:</b> 08/18/2016

**Purpose and Principles:**

The purpose of the Authentication of System Users policy is to ensure that all Participants of SacValley MedShare (SVMS) adequately and reasonably protect access to the Health Information Exchange (HIE) data.

**Scope and Accountability:**

This policy applies to all Participants and SVMS, as well as their contractors, business associates, employees, and/or vendors.

**Policy Statement:**

SacValley MedShare and each Participant shall ensure that its own organization has appropriate controls in place for proper user access to the Health Information Exchange data. SVMS shall also ensure that data mining is systematically disallowed.

Participants shall:

- Designate an individual who shall be responsible for HIE access on behalf of the participant.
- Designate authorized users and setup those users with the HIE system based on “Need to Know”.
- Train and supervise authorized users, including those whom are not directly employed by the participant; business associates, vendors, contractors, etc.
- Immediately notify SVMS Executive Director or designated contact should access need to be terminated.
- Hold authorized users accountable for compliance with SVMS and Participant’s policies and, as applicable, the terms of any Business Associate Agreement.
- Make this policy applicable to their Business Associates and contractors and sub-contractors of their Business Associates as they deem appropriate through the terms of their business associate agreements.

SVMS shall:

- Grant access authority to the individuals designated by the Participant, subject to reserved authority to suspend, limit, or revoke such access authority as deemed needed or necessary.
- Ensure that each authorized user has unique access credentials that enable his or her activity to be logged.
- Train and supervise its own authorized users on all policies and standard terms required by its Participation Agreement with Participants.
- Suspend, limit, or revoke access authority for its own authorized users or any authorized user as required by these policies or the terms of its Business Associate or Participation Agreement in the event of breach or non-compliance.
- Immediately revoke access authority upon change in job responsibilities and/or employment of SVMS authorized users or authorized user of its contractor/business associate.

 <b>SAC VALLEY MEDSHARE</b>	POLICY: <i>Authentication of System Users</i>	POLICY NUMBER: <i>SVMS-13.001</i>
	Author: Elizabeth L Steffen	Origination Date: 01/14/2015
Compliance Requirement ISO 15408 45 CFR § 162.404(a), 410	Revised By: Elizabeth L Steffen Dr. Kevin Dorsey-Tyler	Revised Date: 08/18/2016

- Suspend, limit, or revoke the access authority of an authorized user on its own initiative upon a determination that the authorized user has not complied with the Participant's privacy policies, SVMS policies, or the term of the user agreement if SVMS determines that doing so is necessary for the privacy of the individuals or the security of the System.

Access to Participant Production Vaults:

- will be granted to all registered users of CareAlign®, except for the GOO (Global Opt-Out) Vault. Larger participant organizations may request user access to CareAlign® for the following:
  - Appropriate clinical professional employees within the hospital organization
  - Physician providers who are who are working under a contractual basis with the hospital or hospital-associated entity, to provide services to the hospital.
  - That **would** include groups working within the hospital (hospitalists, traumatologists, anesthesiologists, ED physicians, etc.) and under contracts already.
  - That **would** include hospital-owned clinics.
  - That **would not** include independent providers referring patients to the hospital or admitting or consulting upon patients in the hospital.

Authorization	Name	Signature	Date
Board Chair	<i>MYRON E. MACHULA</i>	<i>[Signature]</i>	<i>2/2/2017</i>
Compliance Officer			
Executive Director			

Reference:

Central Illinois Health Information Exchange Privacy Policies. (2011, December)

Version	Date	Author	Comment
.001	01/19/2015	E. Steffen/K. Dorsey-Tyler/J. Helvey/M. Jensen/D. LeFevre	Initial release.
.002	08/18/2016	E. Steffen/K. Dorsey-Tyler	Updated for Participant Vault Access