

Central PA Connect

HEALTH INFORMATION | EXCHANGE

Policy Title:	Authorized Users and Use				
Effective Date:	5/14/19	Revision Date:	4/1/2025	Review Date:	4/1/2025
Policy Owner:	Marianne Smith				
Policy Approver:	Keith Cromwell				

POLICY PURPOSE:

This policy establishes the parameter for granting or denying specific requests to obtain and use information and related information processing services.

POLICY STATEMENT:

This Policy in conjunction with the following UPHS Policies collectively detail the requirements for authorizing use of Central PA Connect HIE:

- Access Controls for Information Assets
- University of Pennsylvania Health System Disclosure of PHI with Patient Authorization
- Hospital Acceptable Use of Electronic Resources
- University of Pennsylvania Health System Breach Notification Policy

APPLICABILITY/SCOPE/EXCLUSION:

The policy is applicable to any Central PA Connect Member Organizations that has individuals that have access to the CPC system. This policy covers identification of and requirements for Authorized Users as well as management of violations.

DEFINITIONS:

Authorized Member Organization Individual: the Individual from the Central PA Connect Member Organization that has been designated as the Manager of Authorized Users (required to report Authorized User status changes to the CPC-HIE).

Authorized Users: individual designated to use the Services on behalf of the Member Organization. Only bona fide employees, agents or contractors of the specific Member Organization may be designated as Authorized Users.

Member Organization (MO): means individuals and entities (including, but not limited to, Health Care Providers, physician practices health care facilities, medical laboratories, payers, etc.) that enroll in and connect to CPC-HIE to send and/or receive health information.

Unauthorized Use: is any attempt at or any action that results in circumventing the Access Controls or Policies regarding Access or Access Controls; use in violation of intellectual property, privacy, publicity, proprietary information rights and policies of others; and/or use other than in accordance with the express terms of these Terms and Conditions, the Policies or Applicable Law.

PROCEDURE:

To enable the Central PA Connect to establish appropriate Access for each Member Organization and Authorized User, each MO shall designate a CPC-HIE Authorized Individual who shall provide Central PA Connect with a list, identifying all of the MO's Authorized Users together with the information described in the User Information Form and a signed Confidentiality Agreement.

Thereafter, the MO shall provide notice to Central PA Connect whenever an Authorized User is added or removed by reason of termination of employment or otherwise and provide such notice to Central PA Connect of all such changes within forty eight (48) hours of occurrence utilizing the User Information Form. The Participant shall not permit an Authorized User to transfer his or her credentials to another, either temporarily or permanently.

MO shall verify, and certify to the Central PA Connect, if requested, that each Authorized User has satisfied all requirements and restrict access to the HIE and, if applicable, use of the services, to the Authorized Users if removed for any reason. MO must authenticate, through unique User authentication, each Authorized User's identity prior to providing any user with access to Protected Health Information.

Central PA Connect may provide or arrange for the provision of training to each MO's Authorized Individual regarding the MO's access and use of the CPC-HIE and services. MO Authorized Individual shall provide appropriate and adequate training to all of the MO Authorized Users, prior to them becoming Authorized Users, in accordance with the requirements of Applicable Law and regulations governing the confidentiality, privacy, and security of Protected Health Information, including, without limitation, requirements imposed under HIPAA.

The MO shall implement security measures with respect to the CPC-HIE and the services. MO shall record User ID and Date/Time in relation to logging on and off of the system. The Member Organization shall monitor, review logs and adopt policies and procedures for addressing unauthorized access to and use of the CPC-HIE by denying further access and reporting such unauthorized access and use to CPC-HIE and PA eHealth.

The MO shall comply with the standards for the confidentiality, security, and use and disclosure of patient health information as required by HIPPA and Applicable law. In addition, MO shall prevent the transmission of any information that violates the proprietary rights, privacy rights or any other rights of a third party.

PROHIBITED ACTIVITIES:

Member Organization shall not engage in any unauthorized access to or use of the CPC-HIE and shall ensure that its Authorized Users do not engage in any unauthorized use of the CPC-HIE. Individual's unauthorized access to or use of the CPC-HIE shall constitute a material breach of the Central PA Connect Terms and Conditions.

REVIEW AND VIOLATIONS:

The MO will perform a review and examination on an annual basis of records and activities to assess the adequacy of system controls around an Authorized User designated to use the services on behalf of the MO. These reviews must be submitted to Central PA Connect and Central PA Connect may perform an independent review and examination of records and activities to assess the adequacy of system controls.

ROLES AND RESPONSIBILITIES:

Member Organization manages requests and changes to Authorized User status, reporting to Central PA Connect and operationalizing process to permit Authorized User account set up, change and/or closure.

Central PA Connect maintains a list of Authorized Users.

APPENDICES

- N/A

FORMS:

- User Information Form
- Confidentiality Agreement

REFERENCES: N/A

- Access Controls for Information Assets
- University of Pennsylvania Health System Disclosure of PHI with Patient Authorization
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