

TITLE: Access Management	
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Appendix A. Participant's and Authorized Users' Key Access Management Responsibilities

1. Purpose

The purpose of this policy is to describe the methods by which Authorized Users' access to the Hawai'i HIE's Health eNet system ("Health eNet", the "System") will be provisioned, monitored and modified.

2. Scope

This policy pertains to access to the Health eNet by Authorized Users associated with valid Health eNet Participants, according to criteria in the Hawai'i HIE's *Entity Participation Registration* (HEN-003) Operational Policy and Procedures.

This policy applies to: 1) the Hawai'i HIE and all of its workforce members, 2) all Health eNet Authorized Users, 3) all Hawai'i HIE business associates, subcontractors, and 4) all Hawai'i HIE Participants.

3. Definitions

Authentication. The process of verifying that an individual, entity or software program accessing the Health eNet is the Authorized User the person, entity or program claims to be.

Authorization. The process of determining whether a particular User has the right to access the Health eNet, and determining the privileges associated with such access.

Authorized User, User. A person who has met the requirements of this Operational Policy and Procedures document for obtaining Health eNet access authority.

Break Glass. A privilege that provides access to a patient's information in the Health eNet Community Health Record (CHR) prior to the User establishing a treatment, payment or limited health care operations relationship with the patient.

Emergency, Internal to the Hawai'i HIE ("Internal Emergency"). An incident that causes the effective response capability of the Hawai'i HIE to administer the Health eNet to be exceeded. Hawai'i HIE management determines whether an Internal Emergency is in effect for the Hawai'i HIE, based on criteria in the Hawai'i HIE's Emergency Mode Operation Plan.

Emergency, Proclaimed by State Government ("State Emergency"). Any occasion or instance for which, in the determination of the executive branch of the State of Hawaii, State assistance is needed to support efforts and capabilities to save lives, and to protect property and public health and safety, or to lessen or avert the threat of a catastrophe in any part of Hawaii. Emergency assistance differs from disaster assistance. It is intended to avert a catastrophe through the support of emergency actions. It does not include any restoration or permanent repairs. An emergency does not have to be a natural disaster. For example, it may be a widespread water system contamination.

Major Disaster, Proclaimed by State Government (“Major Disaster”). Any natural catastrophe including any hurricane, tornado, storm, high water, wind-driven water, tidal wave, tsunami, earthquake, volcanic eruption, landslide, mudslide, snowstorm, or drought, or, regardless of cause, any fire, flood, or explosion which, in the determination of the executive branch of the State of Hawaii, causes damage of sufficient severity and magnitude in any part of Hawaii to warrant major disaster assistance by the State to support the efforts and available resources within Hawaii to alleviate the damage, loss, hardship, or suffering caused by the catastrophe.

Participant, Participating Entity. An organization or other entity that has entered into a written agreement with the Hawai’i HIE to act as a data contributor, data recipient or both – utilizing one or more of the Hawai’i HIE’s information-exchange service lines. A Participating Entity must meet the requirements for participating with the Hawai’i HIE set forth in the Hawai’i HIE’s Operational Policies and Procedures.

Personally Identifiable Information (PII). Any information that permits the identity of an individual to be directly or indirectly inferred, including any other information which is linked or linkable to that individual. If such information pertains to the health care of an individual, and is accessed or disclosed by or on behalf of a HIPAA covered entity, then the information is considered Protected Health Information (PHI).

Primary Point of Contact. The person serving as the main point of contact between the Hawai’i HIE and a Participant regarding Health eNet operations.

Provisioning. The process by which Authorized Users are granted authorization and access to use the Health eNet via an established unique user identity, password, and assignment of access rights and privileges based on the “least privilege” (i.e. the minimum need to know or access information) for using the System that the Authorized User should be provided to fulfill his/her user role.

Role-Based Access. The process for determining an Authorized User’s Health eNet access rights and privileges based on the User’s job function and the information needed to perform that job function.

Site Administrator. The person responsible for performing duties, as directed by a Participant, related to activating and making changes to Authorized Users’ Health eNet access privileges. A Participant’s Site Administrator may be one of its workforce members or a Hawai’i HIE workforce member designated to serve as the Participant’s Site Administrator.

System Administrator. Hawai’i HIE workforce member responsible for performing duties related to maintenance of the Health eNet and support of the System’s Authorized Users, coordinating with subcontractors and Site Administrators as necessary.

Very Important Person (VIP). A status corresponding to additional or elevated security protocols (e.g. additional authentication and/or attestations of valid access by Users) assigned to a patient by a Participant and applied to the patient’s record, based on the Participant’s policies and procedures.

4. Policy and Procedures

Participants, the Hawai’i HIE, and their respective Authorized Users shall follow these requirements

and standards when provisioning access to and using the Health eNet. Appendix A provides reference lists of Participants' and Authorized Users' key responsibilities under this policy.

- 4.1. Participant Access Management Prerequisites.** Each Participant shall meet the applicable requirements specified in the Hawai'i HIE's *Entity Participation Registration (HEN-003) Operations Policy and Procedures*, including designating workforce members as points of contact for the purposes of access management.

Procedure
1. Each Participant shall assign a Primary Point of Contact to serve as a liaison between the Participant and Hawai'i HIE.
2. Each Participant shall assign a Site Administrator to support its Authorized Users and conduct required audits of those Authorized Users, in cooperation as necessary with the Hawai'i HIE.

4.2. User Access Roles, Authorization and Provisioning

- 4.2.1. Establishment of Role-Based Access.** The Hawai'i HIE shall establish role-based access standards for Health eNet Authorized Users.

Procedure
1. The Hawai'i HIE shall define the purposes for which access may be granted, and the types of information that may be accessed, for each role type. Such role definition shall include: 1) Multiple roles, allowing for broader access to information within the Health eNet for some job functions (such as emergency department physicians) and more-limited access for other job functions (such as workforce members that do not treat patients). 2) Define the types of information that Authorized Users within such roles may access (e.g., demographic data only, clinical data, User authority and privileges); and 3) Determine which roles are provided special privileges to access PHI (e.g. Break Glass, VIP, confidential).
2. The Hawai'i HIE shall make the current access role types designated for Participant Authorized Users, and these roles' definitions, available to prospective Participants during the registration process described in the Hawai'i HIE's <i>Entity Participation Registration (HEN-003) Operational Policy and Procedures</i> .

- 4.2.2. Assignment of Access Roles to Participant Authorized Users.** The Hawai'i HIE and each Participant shall approve Health eNet access only for its workforce members whose job functions require such access, and assign an access role to each designated Authorized User appropriate to his/her job function.

Procedure
1. Each Participant shall identify which of its workforce members will be assigned which access roles during the Participant registration process.

2. Participant Site Administrators shall work with Hawai'i HIE Provider Services representatives and Site Administrators as necessary to modify Authorized Users' access roles or terminate their Health eNet access authorities (e.g. in the event of job function change or employment termination).
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4.2.3. Assignment of Access Roles to Hawai'i HIE System Administrators. The Hawai'i HIE shall designate workforce members to serve as Health eNet System Administrators.

Procedure
1. The Hawai'i HIE shall designate and activate Health eNet System Administrators from among its workforce, which may include the following: <ul style="list-style-type: none">• Hawai'i HIE System Administrator(s) with access to non-clinical information• Hawai'i HIE System Administrator(s) with access to clinical information.
2. The Hawai'i HIE shall assign an access role to each System Administrator, based at a minimum on the System Administrator's job function related to System maintenance and audit, and support of Authorized Users.

4.2.4. Provisioning of Access for Participant Authorized Users.

Procedure
1. Each Participant's Site Administrator shall activate each new Authorized User's access to the Health eNet, in accordance with the access role assigned by the Participant.

4.2.5. Provisioning of Access for Hawai'i HIE Authorized Users.

Procedure
1. The Hawai'i HIE's IT Manager shall activate each new System Administrator's Health eNet access, in accordance with the access role assigned by the Hawai'i HIE.

4.3. Authentication Requirements and Controls. The Hawai'i HIE and Participants shall ensure that authentication controls are implemented to safeguard access to the information within Health eNet, and to the Health eNet's system components.

4.3.1. Authentication Credentials Required for Health eNet Access. Authorized Users, including Site Administrators and System Administrators, must each utilize unique credentials to positively identify themselves when accessing the Health eNet. Such credentials shall, at a minimum include a unique username and private password.

Procedure
1. The Hawai'i HIE shall ensure that each new Authorized User must create or be assigned an initial, unique username and password prior to accessing the Health eNet.

4.3.2. Authentication Credentials Specifications and Rules. Authentication specifications and rules must be strong enough to meet prevailing standards and/or guidelines for safeguarding Personally Identifiable Information applicable to the U.S. health care industry.

Procedure
1. The Hawai'i HIE shall ensure that Authorized Users' authentication credentials for accessing the Health eNet meet the following requirements: <ol style="list-style-type: none"> 1) Authorized Users must change their passwords once at least every ninety (90) days; 2) Passwords are a minimum of eight (8) characters in length, contain at least one capital letter, at least one number, and at least one special character; 3) Passwords are masked as they are typed by Authorized Users; 4) Access to a Health eNet User account is locked after a maximum of five (5) consecutive unsuccessful attempts to login to the System; 5) Restoration of access to a locked Health eNet User account requires the Authorized User to successfully answer at least three (3) security questions or contact the Site Administrator to restore access to his/her Health eNet User account; 6) If restoration of access fails due to improper answers to security questions, the User will be referred to his/her organization's Site Administrator; and 7) The previous five (5) Health eNet passwords may not be used for the current password.
2. The Hawai'i HIE shall ensure, to the degree practicable, that: <ol style="list-style-type: none"> 1) The access control systems for the Health eNet's system components; e.g. network, domains, servers, applications, database management systems, and workstations; utilize individual accounts with unique ID's for each Authorized User; and 2) Any default User IDs installed with System-related software, devices or other components are removed, disabled or have had their passwords changed upon installation or initial logon.
3. Authorized Users shall: <ol style="list-style-type: none"> 1) Safeguard, and not share their usernames and passwords used for accessing the Health eNet and other System components with others; 2) Not acquire or use the User names or passwords of other Health eNet Users or workforce members with access to System components; and 3) Immediately notify the Site Administrator, and other system administrators as needed, if any passwords used to access the Health eNet or System components are compromised (i.e. acquired by

someone other than the Authorized User), or cannot be reset by the User.

4.4. Authorized User Awareness and Training. The Hawai'i HIE and each Participant are responsible for training and ongoing supervision of their respective Authorized Users regarding proper Health eNet access management. Such training shall reinforce awareness of and compliance with HIPAA, other applicable laws, and the Hawai'i HIE's Operational Policies and Procedures.

4.4.1. Training of Participant Authorized Users.

Procedure
1. The Hawai'i HIE shall provide Site Administrator training to a Participant's Authorized Users designated as Site Administrators.
2. The Hawai'i HIE shall provide the Participant's Primary Point of Contact with an overview of and information regarding Hawai'i HIE Operational Policies and Procedures pertaining to access and use of the Health eNet.
3. The Hawai'i HIE, with assistance from the Participant and subcontractors as necessary, shall provide Health eNet end-user training to new Authorized Users upon activation of their Health eNet User accounts.
4. The Participant shall train and supervise its Authorized Users regarding the Hawai'i HIE's Operational Procedures and any of the Participant's policies and procedures that pertain to access and use of the Health eNet. Such training shall be provided to each Authorized User prior to activation of his/her Health eNet User account, and periodically thereafter.

4.4.2. Training of Hawai'i HIE Authorized Users.

Procedure
1. The Hawai'i HIE shall provide System Administrator training to its Authorized Users designated as System Administrators.
2. The Hawai'i HIE shall provide Site Administrator training to its Authorized Users designated as Participants' Site Administrators.
4. The Hawai'i HIE shall train and supervise its Authorized Users regarding the Hawai'i HIE's Operational Procedures and any other Hawai'i HIE policies and procedures that pertain to access and use of the Health eNet. Such training shall be provided to each new Authorized User prior to activation of his/her Health eNet User account, and periodically thereafter.

4.5. Monitoring of User Access. The Hawai'i HIE shall actively monitor use of the Health eNet, based on the requirements of its *System Audit* (HEN-010) Operational Policy and Procedures.

4.5.1. Reports of Active Users. The Hawai'i HIE shall periodically run audit reports listing the current active Authorized Users and their respective Health eNet access roles for each Participant.

Procedure
1. A list identifying each Authorized User and their associated access role shall be maintained by the Hawai'i HIE System Administrator and used to monitor User Access.
2. The Hawai'i HIE shall provide each Participant with the list of the Participant's Authorized Users for review at a minimum of once a year to determine if modifications to any Authorized Users' access authorities are required.
3. The Participant's Primary Point of Contact will make appropriately modify the list of Authorized Users and their access authorities, e.g. to reflect changes in an Authorized User's job function or employment status, or to delete an Authorized User from the list due to termination of employment, then sign off on the revised list.
4. The Participant shall retain records of changes to its Authorized Users' access authorities, according to the Participant's policies and procedures.

4.5.2. Reports of User Access Activity. The Hawai'i HIE shall periodically run audit reports of Participants' and its own Users' activity to identify potential instances of unauthorized access, use or disclosure of information via the Health eNet.

Procedure
1. Participants' Primary Points of Contact and the Hawai'i HIE's System Administrators shall refer to and follow steps outlined in the "Periodic Audits of Participants' Users Access by the Hawai'i HIE" section of the Hawai'i HIE's <i>System Audit</i> (HEN-010) Operational Policy and Procedures.

4.6. Modification of User Access Authority. In the event of a change in job responsibilities or employment status of an Authorized User, or confirmation that a User is responsible for unauthorized access, use or disclosure of information via the Health eNet (as discussed in sub-section 4.9, "Unauthorized Access, Use, or Disclosure"):

4.6.1. Modification of Participant Authorized User Access Authority. A Participant shall, as necessary, direct its Site Administrator to modify, suspend or terminate a Participant User's Health eNet access authority.

Procedure
1. The Participant's Primary Point of Contact identifies the need to modify, suspend or terminate the Health eNet access authority for one or more of its Authorized Users.
2. In accordance with Participant's own internal policies and procedures, the Primary Point of Contact will work with the Participant Site Administrator to modify, suspend or terminate Health eNet access authorities for such Authorized Users.
3. The Hawai'i HIE System Administrator will remove any terminated Authorized Users from the Participant's Health eNet organization.
4. If the Primary Point of Contact is notifying the Hawai'i HIE of the termination of all its Authorized Users, which would also entail

<p>termination of the Participant’s Health eNet organization account, then the Primary Point of Contact shall refer to and follow the steps outlined in the Hawai’i HIE’s <i>Participating Entity Suspension, Termination and Reinstatement</i> (HEN-004) Operational Policy and Procedures.</p>
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4.6.2. Modification of Hawai’i HIE Authorized User Access Authority. The Hawai’i HIE shall, as necessary, direct a System Administrator to modify, suspend or terminate a Hawai’i HIE User’s Health eNet access authority.

Procedure
1. The Hawai’i HIE identifies the need to modify, suspend or terminate the Health eNet access authority for one or more of its own Authorized Users.
2. Hawai’i HIE management will direct a Hawai’i HIE System Administrator to modify, suspend or terminate the Health eNet access authorities for such Authorized Users.
3. The Hawai’i HIE System Administrator will execute the requested access changes, and remove any terminated Users accounts from the Hawai’i HIE’s Health eNet organization.

4.6.3. Timeliness of Modifications. Modifications of Authorized Users access authorities shall be made prior to, during or immediately following a change in job responsibilities or employment status, or detection of unauthorized System activity, to help prevent unauthorized access or use of the System.

4.6.4. Inactive Authorized User Accounts. The Hawai’i HIE will suspend a Health eNet Authorized User account that has been inactive for at least one hundred eighty (180) consecutive days.

If the User account continues to remain inactive for one (1) year, the account will be deactivated.

4.6.5. Leaves of Absence. A Participant may direct its Site Administrator to suspend the access authority of an Authorized User who will be on a sabbatical or other voluntary long-term or indefinite leave of absence.

Procedure
1. The Participant’s Primary Point of Contact provides confirmation to the Participant’s Site Administrator that an Authorized User will be on leave, and provides the Site Administrator with the date on which to suspend the User’s privileges.
2. The Site Administrator, or Hawai’i HIE System Administrator acting in the role of the Participant Site Administrator, shall suspend the access of an Authorized User who will be on sabbatical or other voluntary long-term leave of absence; and as prescribed in sub-section 4.6.4, “Inactive Authorized User Accounts”, deactivate the User’s account after one (1) year of continuous inactivity.

- 4.7. Transfer of Access to Patient Records Between Participants.** In the event a Participant intends to completely transfer its accountability for patient records to another health care provider, e.g. due to closure of a practice or business, the Participant will notify the Hawai'i HIE prior to the transfer, or as soon as possible if the transfer has already occurred.

Procedure
1. A Participant making a transfer will notify the Hawai'i HIE at least thirty (30) days in advance of the transfer, or as soon as possible if the decision to make the transfer is less than thirty (30) days from the scheduled transfer date or the transfer has already occurred.
2. The Hawai'i HIE may terminate the Authorized User accounts associated with the Participant once the Participant has provided confirmation that the transfer is complete, or the Hawai'i HIE determines that the transfer is complete. Otherwise, such User accounts will be suspended and deactivated as prescribed in sub-section 4.6.4, "Inactive Authorized User Accounts".
3. The Participant making the transfer will provide the name and contact information of the party to whom the patient records will be or have been transferred. The Hawai'i HIE will determine if the party assuming accountability of the records is a Health eNet Participant, and if so the Hawai'i HIE may facilitate transfer of access to the patients' information in the System from one Participant to the other.

- 4.8. Access Management as It Pertains to Participation Termination.** In the event a health care provider or other Participating Entity terminates its participation with the Hawai'i HIE, e.g. due to retirement or transfer of its business to another owner, the Participant and the Hawai'i HIE shall follow the provisions of the Hawai'i HIE's Operational Policy and Procedures to appropriately complete the termination of the entity's participation.

Procedure
1. The terminating Participant will follow its internal policies and procedures with regards to transferring its accountability for patient records to another Participant.
2. Please refer to and follow the steps outlined in the Termination of Participation section of the Hawai'i HIE's <i>Participating Entity Suspension, Termination and Reinstatement</i> (HEN-004) Operational Policy and Procedures.

- 4.9. Emergency Access and Use.** The Hawai'i HIE will configure the Health eNet CHR to provide, in the event of an emergency situation or disaster: 1) access authority for a new Authorized User to temporarily access the System, and 2) a temporary increase of access authority (e.g. privilege to Break Glass) for an existing User. Site Administrators may activate or modify Authorized Users' accounts to include such capabilities only in response to emergency or disaster situations, as directed by their respective Participating Entities.

- 4.9.1. Participant Internal Emergency Use.** Administrators for a Health eNet Participant may declare an emergency situation for their facility, e.g. a hospital. The Site Administrator will follow the Participating Entity's policies and procedures for providing access and increasing access privileges in an emergency situation.

Procedure Step
1. A Participant's Primary Point of Contact or Site Administrator notifies the Hawai'i HIE that the Participant is addressing an emergency situation, as defined by the Participant's policies and procedures, impacting one of its facilities.
2. The Participant's Site Administrator will increase access authorities and privileges of the Participant's existing Authorized Users and will provision access for Authorized Users in the event of an emergency situation per the Participant's policies and procedures.
3. The Participant's Primary Point of Contact or Site Administrator will notify the Hawai'i HIE that the emergency situation has ended, based on the Participant's policies and procedures.
4. The Hawai'i HIE will work with the Site Administrator to roll back the Participant's Authorized Users' access authorities and privileges to their respective levels prior to the emergency.

4.9.2. External Disasters Impacting Multiple Participants. An external disaster condition is determined by the Governor of the State of Hawai'i. In the event of a disaster, Health eNet Participants may assume that each affected hospital's emergency management plans have been fully implemented. Site Administrators will follow their Participating Entities' policies and procedures for providing access and increasing access privileges in a disaster situation.

Procedure
1. In the event of an external disaster, Health eNet Site and System Administrators will follow their respective entities' policies and procedures for providing access to and increasing access privileges of Authorized Users.
2. Upon formal declaration by the Governor of Hawai'i that the disaster condition has ended, the Hawai'i HIE will work with the Site Administrators to roll back the Participants' Authorized Users' access privileges to their respective levels prior to the disaster.
3. In the event Hawai'i HIE System Administrators are unavailable, a member of the Hawai'i HIE's Incident Response Team (IRT), as defined in the Hawai'i HIE's <i>Incident Response and Mitigation</i> (HEN-012) Operational Policy and Procedures, may engage the Hawai'i HIE subcontractor with System Administrator privileges to modify Authorized Users' access privileges as necessary during and following a disaster.
4. The Hawai'i HIE will rely on Participants' Primary Points of Contact to provide confirmations of disaster mode operations being terminated for their respective facilities.

4.10. Unauthorized Access, Use or Disclosure. A Participant shall immediately notify the Hawai'i HIE whenever the Participant detects or suspects an unauthorized access, use or disclosure of information via the Health eNet.

In the event the Hawai'i HIE detects or suspects unauthorized access, use or disclosure of information via the Health eNet, the Hawai'i HIE shall immediately notify the Participant that contributed the information to the System.

The Hawai'i HIE may suspend the access of a User suspected of unauthorized access, use or disclosure of information via the Health eNet.

The Hawai'i HIE may terminate the access of a User suspected of unauthorized access, use or disclosure of information via the Health eNet, and if necessary permanently ban a user, per subsection 4.11 below.

Procedure
1. Please refer to and follow the steps prescribed in the Hawai'i HIE's <i>Incident Response and Mitigation</i> (HEN-012) Operational Policy and Procedures upon discovery by Participant workforce members, business associates (BAs) or subcontractors; or Hawai'i HIE workforce members, BAs or subcontractors; of unauthorized access, use or disclosure of information via the Health eNet.
2. If warranted, based on the recommendations of the Incident Response Team for a given incident, the Hawai'i HIE will suspend a User's Health eNet access authority, pending the outcome of the investigation.
3. If warranted, based on the recommendations of the Incident Response Team for a given incident, the Hawai'i HIE'S Chief Executive Officer will consider the IRT's recommendation, and make the final determination regarding termination of a User's Health eNet access authority, per sub-section 4.10, "Unauthorized Access, Use or Disclosure". <ul style="list-style-type: none"> • The Hawai'i HIE will notify the User and the Participant's Primary Point Contact of the termination.

4.11. Permanent Ban of Terminated Users. The Hawai'i HIE may permanently ban a terminated User from using the Health eNet as necessary to mitigate an "incident", as defined in the Hawai'i HIE's *Incident Response and Mitigation* (HEN-012) Operational Policy and Procedures.

Procedure
1. The Hawai'i HIE's Incident Response Team, with cooperation of the Authorized User's Participant and other parties as necessary, will determine if any person whose access authority as a Health eNet User has been terminated will additionally be permanently banned due to: <ul style="list-style-type: none"> • An incident involving criminal misuse of the Health eNet, or • Another reason that warrants permanent termination of the User's access as a mitigation of risk regarding the incident.

4.12. Retention of User Accounts and User Account History. The Hawai'i HIE will secure terminated or otherwise deactivated Health eNet Authorized User accounts, and record access to such accounts, to safeguard against their unauthorized access or use.

The Hawai'i HIE will record and maintain an historical log of all active and inactive User accounts for audit and investigative purposes.

Procedure
1. Hawai'i HIE System Administrators shall isolate all deactivated and terminated Health eNet Users in a Health eNet organization account designated for terminated Users.
2. Hawai'i HIE System Administrators will record a log of all active and inactive User accounts, and the specifications for each User's current access authority, for each Participant Organization at least annually.
3. Hawai'i HIE System Administrators will maintain logs of active and inactive User accounts for each Participant Organization.

5. Revision History

Revision Date	Revision Type*	Author(s)	Revision Rationale, Description	Approved by
April 4, 2012	New	Hawai'i HIE	Initial version of policy	Christine Sakuda
July 8, 2013	Amendment	Legal/Policy Committee (policy sub-committee)	Content and technical-writing edits, policy identification number revision	Hawai'i HIE Board of Directors
May 21, 2014	Amendment	Legal/Policy Committee (policy sub-committee)	Content and technical-writing edits	Hawai'i HIE Board of Directors
Dec. 16, 2015	Amendment	Legal/Policy Committee	Table of contents, section numbering and procedures added; existing definitions and policy sections edited to reflect current Health eNet services and operations	Hawai'i HIE Board of Directors
Dec. 19, 2018	Amendment	Legal/Policy Committee	Scheduled substantive review of operational policy; edited for conformity with applicable laws, standards, and guidance	Hawai'i HIE Board of Directors

* Revision Type options = New, Amendment, Minor Amendment, Consolidation (i.e. merging of multiple policies)

Appendix A

(Revised July 3, 2015)

Participant's and Authorized Users' Key Access Management Responsibilities

- **Participants' Key Responsibilities.** Each Participant has the responsibility to:
 - Designate a Site Administrator (sub-section 4.1), who may be the same individual as the Participant's Primary Point of Contact, or the Hawai'i HIE, as described in the Hawai'i HIE's *Participating Entity Registration* (HEN-003) Operational Policy and Procedures;
 - Designate Health eNet Authorized Users from among its workforce (sub-section 4.2.2);
 - Assign an access role to each Authorized User (sub-section 4.2.2);
 - Provide initial and annual training to its Authorized Users regarding HIPAA, other applicable laws and policies and procedures pertaining to the Health eNet (sub-section 4.4.1);
 - Supervise its Authorized Users to meet the requirements of such laws, policies and procedures, and holding its Users accountable for doing so (sub-section 4.4.1);
 - Direct its Site Administrator to activate, terminate, suspend or modify access authorities of Users as necessary (sub-section 4.6); and
 - Notify the Hawai'i HIE of events that may involve unauthorized access, use or disclosure of information via the Health eNet (sub-section 4.10).

- **Authorized Users' Key Responsibilities.** Prior to first accessing the Health eNet, each Authorized User must:
 - Assist his/her Participating Entity as necessary to ensure the User is assigned an appropriate Health eNet access role by the Participant (sub-section 4.2.2); and
 - Complete training (sub-section 4.4.1).

Upon being provisioned access to the Health eNet, each Authorized User must:

- Limit use of the System to the activities permitted for the User's job function on behalf of the Hawai'i HIE or Participant, even if his/her user role permits activities beyond the scope of duties within that job function (sub-sections 4.2.2, 4.6.1);
- Limit access, use and disclosure of information via the System to the degree and duration of time necessary to perform a given authorized task (e.g. for patient care, System administration, fulfilling a request for access, amendment or accounting of disclosures of PHI) (sub-sections 4.2.2, 4.6.1);
- Report any potential unauthorized access, use or disclosure of information via the Health eNet, or any attempt to tamper with the System, to an appropriate point of contact responsible for receiving notifications of such events within his/her Participating Organization (sub-section 4.10);
- Not share his/her user names or passwords used for accessing the Health eNet user interface or other System components with others (sub-section 4.3.2); and
- Not acquire or use the user names or passwords of other Health eNet Users or workforce members with access to System components (sub-section 4.3.2); and
- Immediately notify the Site Administrator, and other system administrators as needed, if any user names or passwords used to access the Health eNet or System components are forgotten or compromised, or need to be reset (sub-section 4.3.2).