



Clinical Data Repository Access for External Networks Use Case

Version	Approval Date	Owner
1.0	December 1, 2018	Pam Clarke

1. Purpose

Patients usually receive health care services close to their home or work. However, their health information may not be readily available to other providers when they seek care away from home or work. To facilitate a broader type of access within Pennsylvania and to other states and networks, HSX has or will establish legal arrangements with External Networks including, but not limited to, the Pennsylvania Patient and Provider Network (P3N) and the Sequoia Project which will make the HSX Clinical Data Repository (CDR) accessible to health care providers and health plans that serve those patients and members within and outside of the Greater Philadelphia region.

2. Scope

Authorized Users of External Networks shall be granted access to the CDR in accordance with all established Data use agreements between HSX and the External Network:

- For Treatment purposes which includes care coordination;
- For the purposes of the P3N pursuant to the agreement between the Pennsylvania eHealth Partnership Authority and HSX subject to the applicable P3N Policies posted on the Authority's website;
- To support the Use Cases described in Exhibit B, Section II of the Founding Member Participation Agreement, as amended from time to time, and
- For future non-Treatment purposes approved in accordance with the HSX Use Case Governance Policy.

HSX Participants shall have access to External Networks in accordance with all established Data use agreements.

Authorized Users of the CDR shall be able to access patient Data from External Networks in accordance with the access controls established in the HSX Clinical Data Repository Access Policy.



- **Minimum Necessary Data Elements:** HSX will restrict the Data elements accessible by an Authorized User.

3. Policy

Patient Consent

- Access to the CDR is subject to the HSX Opt-Out and Opt-Back-In Policy. No patient Data shall be available for patients who have chosen to opt-out in accordance with HSX Policy. If a search is conducted for a patient who has opted out, the results of the search would be a message stating that the patient has declined access to their Data.
- In accordance with Pennsylvania and federal laws, consent is required for access to Super Protected Data under certain circumstances.

Authorized Users

- Authorized Users are designated in accordance with the HSX Clinical Data Repository Access Policy.

HSX Participant Access to External Network

- HSX must grant permission in order for an Authorized User to be able to access the External Network.
- When an Authorized User accesses the CDR through the HSX query portal, the Authorized User views patient Data as represented in the CDR. Additional patient Data may be viewed through an External Network tab.
- HSX's Authorized Users may obtain Data from an External Network as needed through an export in a structured data format. For treatment purposes, this could be a longitudinal clinical record of the patient or member. HSX may configure who has the ability to export data from the CDR.
- HSX's Authorized User exits and logs off CDR.

External Network Access to HSX Clinical Data Repository

- With appropriate verification, and if the patient has not opted out, Authorized Users of External Networks shall have access to longitudinal health information on behalf of the patient for whom a search was conducted.

Service Availability and Support

- HSX or its designees will provide 24/7 availability and support when the CDR is available in production. To make support requests, contact HSX Support as follows: Phone: 855-479-7372 (855-HSX-SEPA)



4. Enforcement

- HSX's Chief Information Security Officer will work with HSX Participants in identifying specific Authorized Users and will manage access to the HSX Network and CDR accordingly.
- In accordance with the HSX Audit and Monitoring Policy, HSX will monitor access and viewing of Data to ensure that it is in accordance with the purpose and scope defined above. Any Participants' and its Authorized Users failure to adhere to HSX's applicable policies including the Data Misuse Policy will be subject to corrective action that may include, but not be limited to, re-education, training, suspension of service until the Participant is able to comply with applicable Policies, and/or termination of access.
- HSX shall maintain audit logs in accordance with the HSX Compliance Policy for (7) seven years of access information.

5. Procedure

None

6. Definitions

For a complete list of definitions, refer to the *Glossary*.

7. References

Regulatory References:

- HIPPA Regulatory Reference: HIPPA § 164.502 (a)
- Pa. Code § 9.672 (c)
- Confidentiality of HIV-Related Information Act 35 P. S. § § 7607 (Act 148)
- Pennsylvania eHealth Information Technology Act; P.L. 1042, No. 121
- 28 Pa. Code § 103.22(b); 28 Pa Code. § 115.27; 28 Pa. Code §563.9.
- 29 CFR 2590.717-2719A 4 (i) (Patient Protections)
- <http://www.paehealth.org/certification>
- **"Participant"** as defined in the HSX Founding Member Participation Agreement means, in general, a person or entity that has entered into a binding agreement with HSX setting forth the terms and conditions of access to and use of the HSX Network after such person or entity is approved as an authorized Participant of HSX.



HealthShare Exchange

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Policy Owner	Privacy Officer	Contact	Pam.Clarke@healthshareexchange.org
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Related Documents	Audit and Monitoring Policy Clinical Data Repository Access Policy Credentialing Policy Compliance Policy Data Misuse Policy Founding Member Participation Agreement Glossary Opt Out and Opt Back In Policy Urgent Patient Activity Liaison Use Case Use Case Governance		