HealtheConnections HIE: Audit Contact Training Guide

This guide helps Audit Contacts understand their responsibilities, access and review required HealtheConnections Health Information Exchange (HIE) audit reports, complete attestations by the applicable deadlines, and know when to contact HealtheConnections for support.

The quick links below allow users to jump directly to the sections most relevant to their needs.

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Audit Report Requirements

Compliance Requirements

As the Audit Report Recipient, you have an important role in ensuring we monitor and safeguard access to patient data.

By signing the HealtheConnections Participation Agreement, your organization agreed to comply with New York State and HealtheConnections' policies to complete the auditing process. This means that you must complete an audit attestation for all required audit reports. If you do not complete and return your audit attestation(s), we are required by regulation to apply sanctions.

These sanctions may include:

- **Retraining**
- **Escalation within your leadership**
- **Request to remove and replace the Audit Contact**
- **Suspension of health information exchange (HIE) users**
- **Suspension of the ability to add new HIE users**

If you need assistance, contact us at support@healtheconnections.org or 315-671-2241 x5.

Audit Report Attestation Expectations

As the Audit Contact for your organization, you must audit and attest to all required reports.

HealtheConnections will notify you via email when an audit is required and provide the attestation form and return deadline. The email will come from echosign@echosign.com. Please read the email in detail and follow all the instructions.

There are two steps to this process:

1. **You will be asked to audit the report(s).**
    a. HealtheConnections audit reports are within HealtheConnections HIE portal.
    b. If any discrepancies were discovered during your audit, please contact HealtheConnections at 315-671-2241 x5, for instructions on how to proceed.
    c. If no discrepancies exist, move to step two.
2. **Sign and return the attestation, indicating that the audit was complete for the report(s).**
    a. In the email you received from HealtheConnections, you will find an adobe review and sign link to the attestation form at the top of the email. Click the link, complete all required fields, and then click to sign. Once you sign the form it will automatically be submitted. The signed agreement will be sent to both you and HealtheConnections for your records.
    b. **Important: DO NOT include protected health information (PHI) on the attestation form, as this is not an encrypted system**. If you need to provide HealtheConnections with PHI or are asked to provide consents, please note that these can only be returned via:
        i. Fax at 315-407-0053
        ii. Secure Messaging at support@hiemail.healtheconnections.org
        iii. In the fax cover sheet/Secure Messaging subject line, include "*Your Organization Name* – Consent Forms".

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Audit Requirements and Timing

Report Name	Report Details	Organization Type	Audit Cadence	Complete Audit AND Return Attestation Within
Patient Records Accessed	Patient records accessed by users at an organization that collects consent	All Participants that are authorized by law to access without consent (e.g., Public Health, Organ Procurement, Death Investigators) All Participants that access patients with consent	Weekly: Organ Procurement Participants Monthly: Public Health and Death Investigators Annually: All other Participants	Weekly: One (1) Week Monthly: Four (4) Weeks Annually: Four (4) weeks
HIE Portal User List	Lists all your users and the type of accesses they have been granted	All Participants	Annually	Four (4) Weeks
Break the Glass (BTG)	Daily report of emergency access, BTG events, that occurred at an organization that treats emergencies, such as a hospital ED or ambulance/EMT	Participants with BTG Access (ED, EMT)	Daily, if occurred	One (1) Week

Helpful Tips

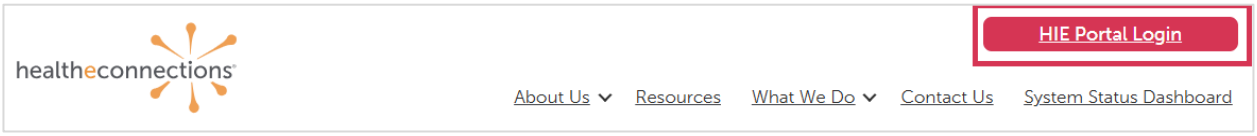
- **HealtheConnections must be notified within 24 hours of a staff departure.**
- We strongly encourage you to review your list of authorized users often and report any changes (e.g., incorrect access type, name change, terminated employee, etc.) to HealtheConnections using our online User Account Modification & Termination Form.
- The audit and attestation certifies compliance with HealtheConnections' policies for access and usage of the HIE.
- For an Audit Contact Role Reference Sheet, click here.
- If you need assistance, contact us at support@healtheconnections.org or 315-671-2241 x5.

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Accessing and Reviewing Audit Reports

Accessing Audit Reports

Access the HealtheConnections HIE portal at https://www.healtheconnections.org/, click the HIE Portal Login button in the top right corner.

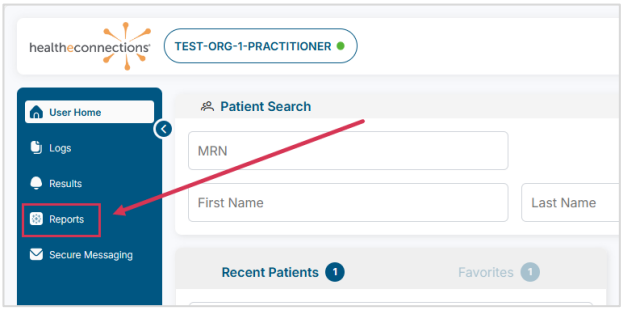


A new window will open to https://portal.prod.healtheconnections.org. At the HIE portal login screen, enter the assigned HealtheConnections Username and Password. Click Sign In, then complete the standard Okta Multi-Factor Authentication (MFA) process.

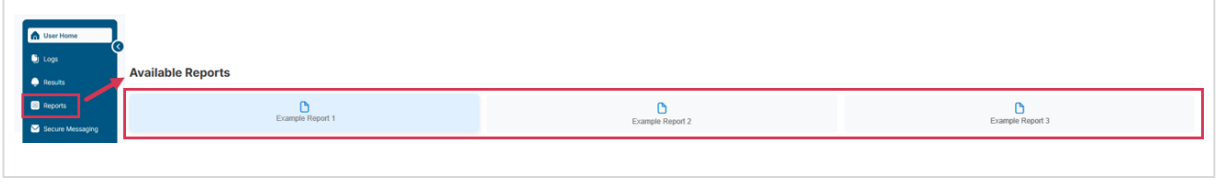


Note: If this is your first time accessing the HIE portal, you will be prompted to set up MFA and a security question. To access the HIE, you need to complete this step. Follow the prompts on the screen to set this up – it only takes a few minutes!

After logging into the Portal, authorized users with access to Reports are directed to the User Dashboard. Reports can be accessed by selecting Reports from the Navigation Panel.

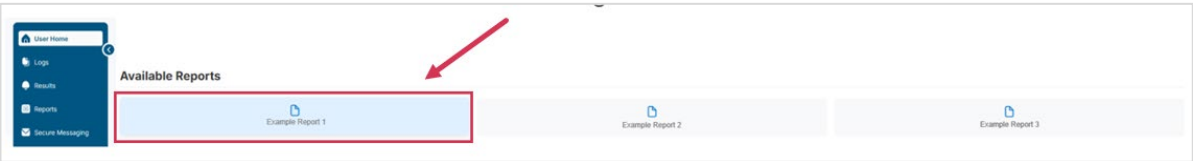


When the Reports link is selected, all available reports for the authorized user will display.



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From the list of available reports displayed on the screen, select the report name to access its cover page and to view the report.



Once you have completed your audit report review(s), be sure to Log Out of the portal.

For more information on Report access, review the Reports User Guide.

Reviewing Audit Reports

See the Audit Report and Instruction section below for specific instructions for each audit report.

Helpful Tips

- Always use an up-to-date browser (e.g., Chrome, Mozilla Firefox, Edge).
- If you forgot your password, click Reset password or unlock account on the HIE portal login screen and follow the prompts. You will receive an email from **noreply@okta.com**, which may go to your Junk folder. If it is not in your Junk folder, contact our Support team at support@healtheconnections.org.

HealtheConnections Support

If you need assistance, reach out to HealtheConnections Support team at support@healtheconnections.org or 315-671-2241 ext. 5.

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Audit Reports and Instructions

Select an audit report below to review its requirements and instructions.

- Patient Records Accessed
- HIE Portal User List
- Break The Glass (BTG)

Patient Records Accessed

Report Details

Patient Records Accessed is a report of patient records that have been accessed by users from an organization.

Organization Type

- All Participants that are authorized by law to access without consent.
- All Participants that access patients with consent.

Audit Cadence

- Weekly – Organ Procurement Participants
- Monthly – Public Health Participants and Death Investigators
- Annually – All other Participants

Requirements

- Weekly: Complete Audit AND Return Attestation Within: ***One (1) Week***
- Monthly: Complete Audit AND Return Attestation Within ***Four (4) Weeks***
- Annually: Complete Audit AND Return Attestation Within ***Four (4) Week***

Instructions

HealtheConnections will notify you via email to complete the Patient Records Accessed report audit and to attest. In this email, we will notify you that your audit is due **and** the timeframe under audit. This is required even if the report shows no activity for the reporting period.

To complete, audit the following from the selected month's report **and** attest within the required timeframe listed above for your organization:

1. You will be provided with a sample size. For each patient in the sample, verify that:
    a. Affirmative Consents are on file for patients whose PHI is disclosed via the Statewide Health Information Network for New York (SHIN-NY) (other than in Break the Glass situations).
    b. Authorized Users who Access PHI via the SHIN-NY do so for Authorized Purposes.

Helpful Tips

- This report can be accessed by Audit Contacts at any time.
- Data covers the past three months.
- Data refreshes on the second day of every month.
- Report filters include:
    - Month - Allows you to filter by individual month
    - User Email - Allows tracking of access activity by individual user
    - User Role - Enables analysis of access patterns based on role (e.g., Practitioner vs. Non-Practitioner)

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HIE Portal User List

Report Details
HIE Portal User List is an annual report that lists all users and the type of accesses they have been granted for an organization.

Organization Type
All Participants

Audit Cadence
Annually, as part of the annual audit

Requirements
Complete Audit AND Return Attestation Within: ***Four (4) Weeks***

Instructions
HealtheConnections will notify you via email to complete your Active User report audit **and** to attest.

To complete, audit the following **and** attest within four (4) weeks:

1. Review users and ensure that these employees are in roles that require access.
2. Notify HealtheConnections of any required changes, such as employees with incorrect type of access, name changes, or terminated employees using our User Account Modification & Termination Form.
3. If an active user has not logged in recently, consider deactivating their access.

NOTE: As a reminder, when an employee leaves your organization, HealtheConnections must be notified within 24 hours of their departure.

Helpful Tips

- This report can be accessed by Audit Contacts and RHIO Administrators at any time.
- Data refreshes daily.
- Report filters include:
  - Active User Filter - This filter allows you to select between Active and Not Active users. Active users have access to the HIE Portal while users whose accounts are Not Active have been disabled, deactivated or no longer permitted to access the system.

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Break The Glass (BTG)

Report Details
Break the Glass (BTG) is a daily report of emergency access, BTG events, that have occurred at an organization that treats emergencies, such as a hospital ED or ambulance/EMT. Each BTG instance must be audited.

Organization Type
Participants with BTG Access (ED or EMT)

Audit Cadence
Daily, as applicable

Requirements
Complete Audit AND Return Attestation Within: **One (1) Week**

Instructions
HealtheConnections will notify you via email when a BTG event has occurred for your organization. This email will inform you to complete your BTG report audit **and** to attest.

To complete, audit the BTG report **and** follow the instructions in the email to attest within one (1) week:

1. Verify that all applicable requirements were met, as outlined in SHIN-NY policies Section 1.2.4, including:
   a. In the Practitioner's or Emergency Medical Technician's judgment, an emergency condition exists, and the patient is in immediate need of medical attention and an attempt to secure consent would result in delay of treatment which would increase the risk to the patient's life or health.
   b. The Practitioner or Emergency Medical Technician determines, in such individual's reasonable judgment, that information that may be held by or accessible via the SHIN-NY may be material to emergency treatment. The individual "Breaking the Glass" may do so only after the determination in #1 has been made.
   c. In the event that an Authorized User acting under the direction of a Practitioner Breaks the Glass, such Authorized User must record the name of the Practitioner providing such direction.
   d. Your organization has notified the patient of such Break the Glass access and inform the patient how they may request an Audit Log in accordance with SHIN-NY policies Section 6.4; OR. In lieu of providing such notice, Participants that are hospitals may notify all patients discharged from an emergency room that their Protected Health Information may have been Disclosed during a Break the Glass incident and inform patients how they may request an Audit Log to determine if such Disclosure occurred. This notice shall be provided within ten days of the patient's discharge (or, in the case of access that does not relate to a hospital admission, within ten days of the date of such access).

Helpful Tips

- This report can be accessed by Audit Contacts at any time.
- Data refreshes daily.
- Report filters include:
  - Created Time - Allows you to select a specific time period to review BTG activity. Only events that occurred within the selected date range will be included in the report.

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