



ePartnerViewer Portal Policies Process and Procedure

1. Purpose

The purpose of this policy is to describe the methods by which authorized users' access to KHIE's ePartnerViewer will be provisioned and monitored.

2. Scope

This policy pertains to access to the ePartnerViewer by authorized users associated with KHIE workforce members and KHIE Participant workforce members.

This policy applies to all authorized users associated with KHIE workforce members and KHIE Participant workforce members.

3. Definitions

Authentication. The process for verifying that an individual accessing KHIE's ePartnerViewer is the authorized user the person claims to be.


Authorization. The process of determining a particular user has the right to access the ePartnerViewer and determining the privileges associated with such access. The process of authorization is conducted by the KHIE Participant.

Participant. An organization that has entered into a written agreement with KHIE to act as a data contributor, data recipient, or both and utilizing one or more of KHIE's service lines. A Participant must meet the requirements for participating with KHIE as set forth in the KHIE Participation Agreement.

Personal Identifiable Information (PII). Any information that permits the identity of an individual to be directly or indirectly inferred, including any other information which is related 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).

Provisioning. The process by which authorized users are granted authorization and access to KHIE's ePartnerViewer via the Kentucky Online Gateway (KOG) as an established unique user identify, password, and assignment of access rights and privileges based on the minimum need to know or access information for using the ePartnerViewer that the authorized user should be provided to fulfill his/her user role.

KHIE ePartnerViewer Administrator (hereafter, referred to as Admin). The person responsible for performing duties, as directed by the Participant, related to activating and making changes to a Participant's authorized users' access privileges. A Participant's *Admin(s)* will be one of its workforce members and may (or may not) also have access to the patient health information in the ePartnerViewer.





Policies and Procedures

1.1 **Participant Access Management Prerequisites.** Each Participant shall meet the applicable requirements specified in the KHIE legal agreement, HIPAA requirements, KHIE policies and procedures, including designating workforce members as points of contact for the purposes of access management.

Procedure.

1. Each Participant shall assign an *Admin(s)* to:
 - a. serve as liaison between the Participant and KHIE.
 - b. manage its authorized users by adding and removing access per user as needed to ensure only those with access should have access.
 - c. support its authorized users with training and access to KHIE training materials.

1.2 User Access Roles, Authorization, and Provisioning

1.2.1 **Establishment of Role-Based Access.** KHIE shall establish role-based access standards for ePartnerViewer authorized users.


Procedure.


1. For each role type, KHIE shall define the purposes for which access may be granted and the types of information that may be accessed. All role types must have a KOG account to access the ePartnerViewer. Role descriptions include:
 - a. **Clinical User Roles.** A Clinical User is a KHIE Participant organization user who has been authorized to access patient data in the ePartnerViewer. Users with a Clinical User role can access all information available on patients. Users with this role can add and manage the receipt of event notifications and can also have any of the administrative or other non-clinical roles.

Please Note: Users with a clinical role who are also authorized KASPER users will have access to view a patient's PDMP report in the ePartnerViewer when a report is available from KASPER.

The Clinical User roles include:

<i>Care/Case Manager</i>	<i>Epidemiologist</i>	<i>Health Records Admin</i>
<i>Infection Control Clinician</i>	<i>Information Technology Associate</i>	<i>Nurse</i>
<i>Nurse Practitioner</i>	<i>Other Healthcare Clinician</i>	<i>Paramedic</i>
<i>Pharmacist</i>	<i>Physician</i>	<i>Physician Assistant</i>





b. **Administrative Roles.** Administrative Roles are roles that do not permit access to the clinical information available on a patient. Users can have more than one administrative role. When authorized by the Participant, users with administrative roles can also have a Clinical User role.

1. *KHIE ePartnerViewer Admin*

a. Designated by the Participant to authorize its organization's users to access the health information in the ePartnerViewer.

2. *Event Notification Admin*

a. Designated by the Participant to manage the receipt of event notifications on patients/patient panels for *Clinical Users*.

3. *Access Admin*

a. 'Break the Glass' management role that is designated by the Participant to see a report detailing the organization's users who have used the 'break the glass' functionality.

4. *PACS Administrator (Picture Archiving and Communication System)*

a. Designated by the Participant to export images into Participants' PACS.

c. **Non-clinical Roles.** Non-clinical roles without an accompanying clinical role cannot access the clinical information available on a patient.

1. Direct Data Entry (DDE) Roles

a. *DDELR*

i. User who can enter all reportable disease lab results.

b. *Manual Case Reporter*

i. User who can enter all reportable disease case reports.


c. *Manual Data Submitter*

i. User who can enter only the reportable disease COVID-19 test results.

2. KHIE shall make the current access role types and definitions available to Participants during the ePartnerViewer training session.

1.2.2 **Assignment of Access Roles to Participant Authorized Users.** Each Participant shall approve access only for its organization workforce members whose job functions require access and assign an access role to each designated authorized user, as appropriate to his/her job function.

Procedure.


1. Each Participant designated *Admin(s)* shall identify organization workforce members who will be assigned access roles.
 2. The *Admin* will oversee (add, modify, and/or terminate) access roles based on new employment, job function change, or employment termination.
- 



KENTUCKY
HEALTH INFORMATION EXCHANGE

Connecting Kentucky. Improving Healthcare.

Kentucky Health Information Exchange
8 Mill Creek Park
Frankfort, Kentucky 40601
(502) 564-7992

- 
- a. KHIE Division Director or designee will send a quarterly email reminder to Participant *Admins* to ensure authorized user access is monitored.

1.2.3 **Assignment of Access Roles to KHIE *Relationship Managers*.** KHIE shall designate KHIE workforce members, including, but not limited to Outreach Coordinators to serve as *Relationship Managers*. *Relationship Managers* have the authorization to provision Participants' Admin(s).

- 1.2.3.1 KHIE Onboarding Analysts also serve as *Relationship Managers* to provision Participants' authorized users for testing and validating data in the PMT environment.

1.2.3.1.2 The PMT environment is limited to two access roles.

- a. *KHIE ePartnerViewer PMT Admin*
- b. *PMT Tester*

Procedure.


1. KHIE shall designate Outreach Coordinators to serve in the role of *Relationship Managers*.
 - a. *Relationship Managers* provision Participant's designated *Admins* and train them on the ePartnerViewer.
 - b. *Relationship Managers* have access to the Organization Management Application, the KOG application that enables provisioning of ePartnerViewer users.
2. KHIE shall designate Onboarding Analysts to serve in the role of *Relationship Managers*.
 - a. *Relationship Managers* provision and train Participant's designated workforce members who are tasked with testing and validating data in the PMT environment and the PMT ePartnerViewer environment.
 - b. *Relationship Managers* have access to the Organization Management Application, the KOG application that enables provisioning of ePartnerViewer users.

1.2.4 **Provisioning Participant Authorized Workforce Member Users.**

Procedure.

1. Each Participant *Admin* shall authorize and provision its users with access to the ePartnerViewer.


1.3 **Authentication Requirements and Controls.** KHIE and Participants shall ensure that authentication controls are implemented to safeguard access to the information in the ePartnerViewer.



KENTUCKY
HEALTH INFORMATION EXCHANGE

Connecting Kentucky. Improving Healthcare.

Kentucky Health Information Exchange
8 Mill Creek Park
Frankfort, Kentucky 40601
(502) 564-7992

- 
- 1.3.1. **Authentication Requirements and Controls.** All authorized users, KHIE workforce members and Participant workforce members, must access the ePartnerViewer via the Kentucky Online Gateway (KOG), the state’s common portal used to access Commonwealth of Kentucky programs, including but not limited to KHIE’s portal, the ePartnerViewer. This security portal restricts access to authorized users. Each user must create a KOG account to access any state-based program, including KHIE’s ePartnerViewer portal. Accessing data through KOG using multi-factor authentication (MFA) validates authenticity and ensures the health information in the ePartnerViewer is secure and safe.


Procedure.


1. KHIE and each Participant shall ensure that each authorized user creates a KOG account to securely access the ePartnerViewer.
2. Authorized users must abide by KOG specifications and rules for creating an account and accessing that account, including but not limited to the email address used and creating and maintaining passwords and security questions.
3. Authorized users shall safeguard KOG usernames and passwords used to access the ePartnerViewer.
 - a. Authorized users shall not share their access credentials or use another authorized user’s credentials to access the ePartnerViewer.
 - b. Authorized users shall immediately notify the Participant’s *Admin* when credentials have been compromised (i.e., acquired by someone other than the authorized user). Authorized users shall immediately notify the KOG Help Desk for assistance.
 - c. KHIE authorized users shall immediately notify the KHIE Support Team. KHIE Support Team will inform the KHIE Deputy Director and the KHIE Division Director when credentials have been compromised.

- 1.4 **Authorized User Awareness, Training, and Follow Up.** KHIE and each Participant are responsible for training and ongoing maintenance of their respective authorized users regarding proper access management. Such training shall reinforce awareness of and compliance with HIPAA, other applicable laws, and KHIE’s policies and procedures.

1.4.1 **Training of Participants’ Authorized Users.**

Procedure

1. Utilizing a ‘Train the Trainer’ approach, KHIE’s Outreach Coordinators shall provide training to the Participant’s designated *Admin(s)*.
 2. KHIE shall provide resource materials for training purposes. The resources will include but
- 



are not limited to electronic versions of training guides and quick reference guides related to usage and navigation of the ePartnerViewer portal; 'how to' videos related to the usage and navigation of the ePartnerViewer; training guides and quick reference guides related to specific functionality integrated within the ePartnerViewer, including but not limited to the Direct Data Entry functionality. These resources will be available in the ePartnerViewer Resources section under *The KHIE Coach* and *The KHIE Coach Direct Data Entry*. These resources will also be available on the KHIE website.

1.4.2 Training of KHIE Workforce Members' Authorized Users

Procedure

1. KHIE shall train and monitor its authorized users regarding KHIE's policies and/or procedures that pertain to access and use of the ePartnerViewer.

1.4.3 Follow up with KHIE Participants After Training

Procedure


1. KHIE's Outreach Coordinators shall provide follow up after training the Participant's designated *Admin(s)*.

- 1.5 **Monitoring User Access.** KHIE shall actively monitor use of the ePartnerViewer for purposes of reporting Participant utilization of the ePartnerViewer.

- 1.5.1 **Reports of Active Users.** KHIE shall periodically run audit reports to determine the number of active users and obtain a list of authorized users, their respective roles, and their respective organizations.

Procedure

1. KHIE shall maintain a list identifying each authorized user and associated access role. KHIE will obtain the list of active users from KOG.
2. KHIE shall send out a quarterly emailing to Participant *Admins* reminding them to review and manage their list of authorized users by adding or removing users' access to reflect changes in job function and employment status.

- 1.5.2 **Reports of User Access Activity.** KHIE shall periodically conduct audits of KHIE workforce members' and Participant users' activity to identify potential instances of unauthorized access, use, or disclosure of information.
- 



Procedure

1. Upon request, KHIE shall conduct audits for Participants to assess specific authorized user access.
2. Upon request, KHIE shall conduct audits for Participants to determine user activity on specific patient records.
3. Upon request and at the discretion of the Deputy Executive Director or Division Director, KHIE will conduct periodic audits of KHIE workforce member user activity.

1.6 **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:

1.6.1 **Modification of Participant Authorized User Access.** A Participant shall, as necessary, direct its *Admin* to modify, suspend, or terminate a user’s access to the ePartnerViewer.

Procedure

1. The Participant *Admin* identifies the need to modify, suspend, or terminate ePartnerViewer access for one or more of its authorized users.

1.6.2 **Modification of KHIE Authorized User Access.** KHIE shall, as necessary, modify, suspend, or terminate a KHIE workforce members’ user access.

Procedure

1. KHIE identifies the need to modify, suspend, or terminate the access for one or more of its authorized users.

1.7 **Timeliness of Modifications.** To prevent unauthorized access to or use of KHIE data, modification of authorized user access shall be made prior to, during, or immediately following a change in job responsibilities, change in employment status, or detection of unauthorized activity.


1.8 **Inactive Authorized user Accounts.** Participant *Admin(s)* shall suspend an 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, KHIE Division Director shall deactivate the account.

Procedure

1. In the email regarding access management that is sent quarterly to Participant *Admins*, KHIE shall include a reminder to identify inactive users.



- 
- 1.9 **Closure of Participant Healthcare Organization.** In the event a Participant closes its healthcare organization, the Participant *Admin* shall notify KHIE prior to the closure.

Procedure

1. A Participant closing its healthcare organization shall notify KHIE at least 30 days in advance of the closing or as soon as possible.
2. The Participant *Admin* shall terminate all its authorized users' access to KHIE. See instructions for removing access in [Provisioning and Access Management QRG](#).
3. Upon notification that authorized users' access has been terminated, KHIE Division Director shall delete the Participant Organization from the KHIE system.

1.9.1 **Participant doesn't inform KHIE that its healthcare organization is closing.**

Procedure

1. When KHIE learns that a healthcare organization has closed, KHIE Division Director or designee shall terminate all authorized users and shall delete the organization's access to the ePartnerViewer.

- 2.0 **Participant Terminates Participation in KHIE.** In the event a Participant terminates participation with KHIE, the Participant shall notify KHIE to appropriately terminate access to the ePartnerViewer.


Procedure


1. Refer to the Participation Agreement regarding appropriate termination of participation.

- 2.1 **Emergency Access and Use.** In the event of an emergency or disaster, KHIE will provide for a HIPAA covered entity access to the health information in the ePartnerViewer.

- 2.1.1 **Participant Emergency Use.** Participant *Admin* or other designee may request assistance with provisioning and training users. It is understood that during certain types of emergencies, Participants' electronic medical record systems may not be accessible.

Procedure

1. Participant notifies KHIE that it is addressing an emergency that affects patient healthcare.
 2. Participant shall ensure it is sharing patient health information with KHIE, so its patient information is in KHIE and is accessible for them in an emergency.
 2. Participant shall ensure it is aware of KHIE and the ePartnerViewer, KHIE's web-based portal, to access patient information.
 3. Participant shall identify its point of contact and designate an *Admin*.
- 

- 
4. The *Admin* shall provision users with access to the ePartnerViewer.
 5. KHIE Outreach Coordinators (*Relationship Managers*) and Division Director will assist with provisioning and training needs during an emergency.
 6. Participant notifies KHIE when the emergency ends.
 - a. The Participant can continue to access the data in the ePartnerViewer.


2.1.2 **Non-Participant Emergency Use.** In the event of an emergency or disaster, a healthcare organization not currently participating in KHIE can request access to the patient health information available in KHIE. It is understood that during certain types of emergencies, Participants' electronic medical record systems may not be accessible.

Procedure

1. A non-Participant that is a HIPAA covered entity/healthcare provider eligible to view clinical data notifies KHIE regarding an emergency impacting patient healthcare.
2. A non-Participant that is a HIPAA covered entity/healthcare provider can sign a KHIE Participation Agreement to gain access, via the ePartnerViewer portal, to the health information in KHIE.
3. Upon receipt of a signed Participation Agreement, the Participant shall designate an *Admin* to work with KHIE to authorize user access and provide training to access the ePartnerViewer portal.
4. KHIE Outreach Coordinators (*Relationship Managers*) and Division Director will assist with provisioning and training needs during an emergency.
5. Participant notifies KHIE when the emergency ends.
6. When the emergency ends, KHIE *Relationship Manager* shall follow up with the Participant to discuss the need for additional KHIE Services.

2.2 **Unauthorized Access, Use, or Disclosure.** A Participant shall immediately notify KHIE whenever the Participant detects or suspects an unauthorized access, use, or disclosure of information has occurred with the use of KHIE data.

In the event KHIE detects or suspects unauthorized access, use, or disclosure of information within KHIE, KHIE shall immediately notify the Participant contributing the information to KHIE.

- a. KHIE can choose to suspend the access of a user suspected of unauthorized access, use, or disclosure of information via KHIE.
 - b. KHIE shall terminate the access of a user confirmed of having had an unauthorized access, use, or disclosure of information via KHIE, and if necessary, permanently ban a user.
- 



KENTUCKY
HEALTH INFORMATION EXCHANGE

Connecting Kentucky. Improving Healthcare.

Kentucky Health Information Exchange
8 Mill Creek Park
Frankfort, Kentucky 40601
(502) 564-7992




Procedure

1. Upon discovery by Participant members, business associates (BAs) or subcontractors or by KHIE workforce members, contractors, or KHIE vendor of an unauthorized access, use, or disclosure of information, please refer to and follow the steps in KHIE's Incident Response and Mitigation Policy.
2. If warranted, based on the recommendations of the Incident Response Team for a given incident, KHIE will suspend a user's access, pending the outcome of the investigation.
3. If warranted, based on the recommendations of the Incident Response Team for a given incident, the Deputy Executive Director will consider the recommendation and make the final determination regarding termination of a user's access.
 - a. KHIE will notify the Participant's KHIE *Admin* of the termination.

- 2.3 **Permanent Ban of Terminated Users.** KHIE can permanently ban a terminated user from accessing the data in KHIE via the ePartnerViewer portal.

Procedure

1. The Incident Response Team, with cooperation of the Participant of the authorized user's and other parties as necessary, will determine if any person whose access has been terminated will additionally be permanently banned because of:
 - An incident involving criminal misuse of the data in KHIE or
 - Another reason that warrants permanent termination of the user's access as a mitigation of risk regarding the incident.
- 



KENTUCKY
HEALTH INFORMATION EXCHANGE

Connecting Kentucky. Improving Healthcare.

Kentucky Health Information Exchange
8 Mill Creek Park
Frankfort, Kentucky 40601
(502) 564-7992




Appendix A

Participant's and Authorized Users Access Management Responsibilities

Participant's Key Responsibilities. Each Participant has the responsibility to:

- ✓ Designate a *KHIE ePartnerViewer Administrator (Admin)*
- ✓ Authorize and provision users from among Organization workforce members
- ✓ Assign access roles to each authorized user
- ✓ Utilize the *Train the Trainer* approach for training users
- ✓ Inform workforce members of the resources, i.e., training guides and videos available through KHIE
- ✓ Provide follow up training as necessary
- ✓ Provide HIPAA training related to protected health information
- ✓ Direct Participant's *Admin* to activate, terminate, suspend, or modify users' access, as necessary
- ✓ Notify KHIE of events that may involve unauthorized access, use, or disclosure of information

Authorized User's Key Responsibilities. Each authorized user has the responsibility to:

- ✓ Complete training for using the ePartnerViewer
 - ✓ Not share usernames or passwords used for accessing the ePartnerViewer
 - ✓ Not acquire or use the usernames or passwords of others
 - ✓ Limit use of the health information in the ePartnerViewer to the activities permitted for user's job function
 - ✓ Limit access, use, and disclosure of information to the degree and duration of time necessary to perform a given authorized task (e.g., for patient care, reconcile meds, review event notifications)
 - ✓ Report any potential unauthorized access, use, or disclosure of information or attempt to tamper with the health information in KHIE to the *Admin* or the person in your organization responsible for receiving notification of such events
- 



HEALTH INFORMATION EXCHANGE

Connecting Kentucky. Improving Healthcare.

Kentucky Health Information Exchange
8 Mill Creek Park
Frankfort, Kentucky 40601
(502) 564-7992