

PARTNERSHIP FOR ACHIEVING TOTAL HEALTH PeEX

Section: HIPAA		Subject: PATH USER ACCESS CONTROL POLICY		
Controls Addressed:	Regulations	Controls		
	Security (A)	45 CFR 164.308(a)(4) , 45 CFR 164.502(b) , 45 CFR 164.514(d)		
Applies to: <input type="checkbox"/> LPHI <input checked="" type="checkbox"/> PATH <input checked="" type="checkbox"/> Business Partner		Effective from: 5-20-2014	Revised on: 2-09-2023	Page 1 of 4
Approved 1-16-2019 Revised 2-9-2023: language changes, removed Definitions and Associated Policies sections Revised 7-24-2023: rebranded to PeEX				

I. PURPOSE

The User Access Control Policy aims to ensure that PeEX, which is administered by PATH, and its Participants comply with all applicable laws in allowing Authorized Users to view protected health information. This policy also reinforces adherence to the HIPAA Security Rule [45 CFR Part 160 and Subparts A and C of Part 164] for data. Establishing protocols related to Authorized User access of PHI is essential to build trust among members and remain in compliance with federal and state laws.

II. SCOPE

This policy applies to use of PeEX and the data stored within PeEX by Participants and the transmission of data from Participants to PeEX.

III. POLICY STATEMENT

- 1) PeEX shall periodically, or upon request, provide a user access log to the Participant, and it is the responsibility of the Participant to notify PeEX of an occurrence of misuse or accounts that should be suspended or revoked.
- 2) Each Participant shall notify PeEX staff within seven (7) business days of an Authorized User who is no longer employed or contracted by the respective Participant.
- 3) All passwords must be changed every 90 days, as appropriate, or immediately upon any breach of the company's security system that is known to the Security Officer
- 4) The transmission of e-PHI by Participants to PeEX shall be HIPAA-compliant.

- 5) A patient's consent status affects the ability of PelEX to provide Services to a Participant. The following table outlines the rules:

Consent Status	Patient Data Sent?
Yes (i.e., opted in)	Yes
No (i.e., opted out)	No
Unknown (i.e., not opted in or out)	Yes