

## Attachment C

### Strategic Health Intelligence Health Information Exchange Patient Medical Records Access Policy

**Background-** The Health Information Exchange (HIE) and Health Information Exchange Direct (HIE Direct) service managed by a Vendor hired by Strategic Health Intelligence (SHI), was developed to enhance the public health of the community by providing healthcare providers real time access to patient records across all facilities. Additionally, SHI will provide interoperability for providers to connect with the Florida HIE. This policy outlines the access procedure for these electronic health records (EHR).

**Policy-** Patient records in the SHI HIE will be made available to physicians and care givers in accordance with HIPAA laws, the terms of the SHI Subscription Agreement for HIE and HIE Direct Services, and will be view-only. Healthcare studies requested by appropriate entities must be approved by the SHI Board, and the data will be either summarized or otherwise de-identified to protect the patient's confidentiality. All records will be managed according to HIPAA guidelines.

#### **Procedure-**

**HIE Services:** Physicians who are credentialed by a healthcare facility will be granted the security authorization by the appropriate facility to view medical records for patients with whom the physician has a treatment relationship. The physician will access the records within their respective physician portal application which has been securely interfaced with the HIE using the application launcher directly linked with the HIE. The physicians will log onto an authorized Physician Portal and from their patient list screen submit a request to view the records in the HIE for this particular patient via a secured link. Both the physician's ID and patient's medical record identifier will be passed directly to the HIE. The HIE will send back the results that match the criteria. Once the user looks at the record and closes that particular screen, the link will be closed. So there is no way the user can see the actual HIE internet address or any other patient record in that session. Only a single patient may be viewed and only through the Physician Portal securely linked to the HIE data base.

**HIE Direct Services:** Physicians who obtain a Florida Health Information Exchange Direct Secure Messaging account will be granted accessed to the HIE Direct Service to obtain medical records for patients with whom the physician has a treatment relationship. The physician can request this data by sending a request form to the Strategic Health Intelligence Direct Secure Messaging account. The physician will attest to having the proper patient authorization to obtain the records. The information provided in the request form will be used to query the Strategic Health Intelligence HIE and the State of Florida HIE. The record will be packaged in a PDF format and sent back securely through the HIE Direct Service to the physician's Direct Secure Messaging account.

**Audit Trails-** The HIE will exchange personal health information in accordance with the current HIPAA regulations and will provide an auditing capability tracking who logged into the system, when they did and what patients were viewed. The HIE will also manage the access for those authorized to perform audits. The audits will be audited too.