



Community Chronic Care Network

---

**Policies and Procedures for CCCN Registry Users**

**Supplement to Physicians Medical Group of Santa Cruz  
County's Implementation of the HIPAA Final Rule on Security**

May 11, 2006

## **Policies and Procedures for CCCN Users**

The Registry User Agreement between Users of the CCCN diabetes registry and the Health Improvement Partnership of Santa Cruz County Inc. (HIP) doing business as Community Chronic Care Network (CCCN) references “Policies and Procedures promulgated by CCCN”. This manual documents the referenced Policies and Procedures with references to the various sections of the User Agreement.

Neither CCCN nor HIP are covered entities as defined in the Health Care Portability and Accountability Act (HIPAA). CCCN contracts with covered entities to operate the registry on behalf of the healthcare provider and is a Business Associate of a covered entity. The operations and agreements of the CCCN are fully compliant with privacy and security regulations including HIPAA.

The CCCN Registry is operated with a license from PMG for the registry software and PMG also provides technical leadership, registry development and support under contract with the CCCN project. This includes setting the standards for privacy and security. These Policies and Procedures supplement the security procedures of the Physicians Medical Group of Santa Cruz County (PMG) as documented in Implementation of the HIPAA Final Rule on Security dated April, 2005.

The CCCN Policies and Procedures also reference the privacy and security policies of the Registry Users. It is not the intent of the CCCN to change the privacy and security policies, procedures and practices of the Registry Users.

It is important to note that the CCCN Policies and Procedures are based on discussion by the CCCN IT Committee at meetings from November 2004 to March 2006. The IT Committee includes representatives from the CCCN partner organizations along with the acute care hospitals.

The membership of the 2004 – 2006 IT Committee includes:

- Central Coast Alliance for Health – Bob Chernis
- County of Santa Cruz, Health Services Agency – Bob Swetnam
- Dominican Hospital – Vicki Carlisle
- Salud Para la Gente – Jensen Lai
- Santa Cruz Medical Clinic and Foundation/PAMF – Catherine Tannaci; Michelle Nix
- Watsonville Community Hospital – Anna Jamrok; Sergio Nell

The CCCN Privacy Liaison is Eleanor Littman, MSN, Project Manager.  
The CCCN Security Liaison is Bill Beighe, CIO, Physicians Medical Group.

## Table of Contents

<u>Policy</u>	<b>Page</b>
Permitted Uses of the Registry.....	<b>4</b>
Access to Individual Patient Data .....	<b>5</b>
User Identification .....	<b>7</b>
Security Audits .....	<b>9</b>
Patient Notification .....	<b>11</b>
Adding Patients .....	<b>13</b>
Removing Patients .....	<b>14</b>

<b>CCCN User Agreement Rights &amp; Responsibilities</b>	<b>Permitted Uses of Registry</b>
--	-----------------------------------

**Policy:**

The CCCN Registry is designed to be used by licensed providers of direct patient care for chronic care management. Patient care providers and authorized office staff are permitted to use the Registry for individual patient care, the management of the User's patient population, and quality improvement.

Health Plans and agents of health plans are permitted to use the Registry as minimally necessary to conduct bonafide health care operations within the purview of the health plan. Permitted uses will be individually specified in the User Agreement with CCCN and may include utilization review, quality improvement, case management and care coordination.

CCCN staff are permitted to use the Registry for the management and administration including maintaining a master patient index, updating patient records, and providing technical assistance. CCCN staff may also use the Registry to create reports that evaluate provider adoption and health outcomes of people with diabetes in Santa Cruz County while maintaining anonymity of User or patient.

Any use of the Registry by CCCN other than described in this policy requires approval by the CCCN Steering Committee.

**Procedure:**

1. Guidelines for use of the Registry will be provided during training, and reference guides will be available to all offices.
2. Patient data can be viewed or printed by authorized users via the Registry application.
3. Patient population reports can be printed by authorized users via the Registry application.
4. Patient records can be viewed, queried, reported, added or updated by CCCN staff for the purposes of obtaining and maintaining the most accurate data and assisting authorized users, and evaluating the outcomes of registry use.
5. CCCN use of the Registry that falls outside the guidelines will require that a request for modification of use be submitted to and approved by the CCCN Steering Committee.

**References:**

Registry User Agreement, 10/21/05; revised 01/13/06. (Template for licensed health care providers)

Registry User Agreement, 10/21/05; revised 01/13/06. (Template for health plans)

**Policy:**

Access to individual patient information included in the CCCN Registry is strictly limited to licensed providers of direct patient care. It also includes office staff associated with the licensed patient care provider and licensed providers who are in the same practice and may provide care to the patient.

Access to individual patient information is also permitted when a provider who has a treatment relationship with a patient has requested a professional treatment service from another licensed patient care provider. This includes referrals for diabetes education programs and referrals to other primary care providers included in the Registry.

Health Plans and agents of health plans can access patient information for health plan enrollees as minimally necessary to conduct health care operations and as specified in the User Agreement with CCCN.

CCCN staff are permitted to access individual patient data as minimally necessary for the management and administration of the Registry.

**Procedure:**

1. Every Registry patient is assigned to a Medical Home and Primary Care Provider/Diabetes Doctor (PCP) if known. This assignment will be based on health plan and encounter data. If a registry patient's Medical Home is not known, the patient's Medical Home will be designated as "unassigned".
2. All authorized users affiliated with a Medical Home will have access to Registry patients assigned to their Medical Home.
3. Authorized users access to individual patient data for the Registry patients who have a Medical Home other than that of the user is as follows:
  - a. The user must provide a complete last name, first name, and birth date in the Add a Patient screen; and
  - b. If the patient record is located it can be viewed after an attestation that the licensed patient care provider has a treatment relationship with the patient.
4. An attestation of a treatment relationship grants one-time access to a patient (version 4.0). In later releases the attestation will be effective for 30 days.
5. If a patient establishes a new Medical Home and/or primary care provider, the user will notify CCCN staff utilizing secure messaging via the Contact Support screen. CCCN will authenticate with user the new information and will change the designated Medical Home and/or primary care provider as appropriate.
6. If a Registry patient is a current enrollee of a health plan, authorized employees of the health plan or a health plan agent can access individual patient data for that patient as minimally necessary to conduct health plan operations.

**References:**

Registry User Agreement, 10/21/05; revised 01/13/06. (Template for licensed health care providers)

Registry User Agreement, 10/21/05; revised 01/13/06. (Template for health plans)

*Summary of Answers to Provider Relationship Questions*, CCCN Clinical Committee 11/05.

<b>CCCN User Agreement Rights &amp; Responsibilities</b>	<b>User Identification</b>
--	----------------------------

**Policy:**

CCCN will create authentication procedures to establish the identity and role of persons requesting User accounts, issuing and reissuing passwords and deactivating User accounts.

Each authorized member at a User site will be granted a Registry account with a unique User ID and password. User ID and password information may not be shared with other users. Each User will login using their own account information and will not allow other users access to their registry session once logged in.

A unique User Account is required for each office/clinic in which a User is employed.

**Procedure:**

1. Each User signing a Registry Agreement will designate a person(s) to authenticate the identity and role of persons who will be authorized to use the CCCN Registry.
2. Prior to implementation at each site, CCCN staff will assign a unique User ID including a password for each person authorized to use the CCCN Registry.
3. The unique User ID will include a password that meets the following criteria:
  - Must be a minimum of eight characters.
  - Must contain upper and lowercase characters.
  - Must contain at least one non-alpha character
  - May not contain the user's name.
  - Expires every 90 days.
  - 3 password resets must occur before a word can be re-used
  - 5 failed logins can occur before the user is locked out.
4. Appropriate use of User Accounts will be presented during training and in training a reference guides will be distributed to users and made available online.
5. The person(s) designated to authorize users will notify CCCN staff and authenticate each additional person authorized to use the Registry and provide an individual e-mail account for the user. The CCCN staff will issue a unique User ID including password and send this information to the user's individual e-mail account.
6. The CCCN staff will change passwords as requested by users by telephone or e-mail. The new password will be sent to user's individual e-mail account as provided by the person authorized to authenticate users. During normal working hours, a request to CCCN staff for a change in/ password will be answered as soon as possible and no longer than one working day.

7. Offices/Clinics will assume responsibility for:
  - a. Adoption and maintenance of reasonable and appropriate security precautions for User IDs and passwords to prevent their disclosure to and use by unauthorized persons.
  - b. The proper conduct of all persons utilizing Registry accounts issued for the benefit of individual users will ensure that no member of Authorized Workforce uses a User ID and password assigned to another person.
8. Immediately notify the CCCN of:
  - a. The termination of employment of any member of the User's Authorized Workforce.
  - b. The User's withdrawal of authorization for any such person to access the Registry.
  - c. A compromised account.

**References:**

Registry User Agreement, 10/21/05; revised 01/13/06. (Template for licensed health care providers)

Registry User Agreement, 10/21/05; revised 01/13/06. (Template for health plans)

Physicians Medical Group of Santa Cruz County, *Authentication and Password Management Policy*, Implementation of the HIPAA Final Rule on Security, April, 2005, pages 9 to 12.

**Policy:**

The CCCN Registry will conduct audits of the database and use of the Registry for data integrity, privacy and security precautions. CCCN staff will conduct these audits according to the Policies and Procedures of the Physicians Medical Group.

The designated privacy/IT security officer of a Registry User will be notified by CCCN staff of any suspected breach of data integrity, privacy or IT security. Registry Users will be expected to investigate and follow-up on any reported breach according to the policies and procedures of the User's organization and any state or federal regulatory requirements.

Registry Users will report the results of an investigation to the CCCN Privacy and IT Security liaisons and specify any follow-up actions requested by CCCN.

Registry Users will promptly notify the CCCN Privacy and IT Security liaisons if they become aware of a possible breach in privacy or IT security of the Registry and request that CCCN conduct an investigatory audit. This includes any complaints from patients about the breach of privacy that may be due to the Registry.

CCCN will report the results of an investigatory audit requested by a Registry User to the User's Privacy or IT Security Officer.

The CCCN will complete a risk assessment annually on the hardware and software of this product. Results will be reported to the CCCN and IT Steering Committees upon completion.

**Procedure:**

1. The CCCN Registry software will produce audit logs and reports which capture sufficient information to establish what events occurred, the sources of the events, and the outcomes of the events.
2. CCCN staff will review audit logs and reports for every user site to document and manage system activity at least once each year.
  - a. At a minimum, included in this audit will be reviews of terminated accounts, access audits and random samplings of appropriateness of access.
  - b. Other criteria for audits will be new users, unusual patterns of use and multiple attestation occurrences.
3. CCCN staff will conduct audits whenever staff becomes aware of possible improper use of the CCCN Registry or when there is an audit request from a registry user.
4. CCCN staff will conduct an investigatory audit within 1-working day when requested by a Registry User or when CCCN becomes aware of a possible breach of privacy or IT security.

5. When a scheduled or requested audit indicates improper use of the Registry, CCCN staff will notify the User for follow-up according to the user's policies and procedures.
6. Audit logs and reports shall be archived according PMG Policies and Procedures.
7. Audit information and audit tools shall be protected from unauthorized access, modification, and deletion.
8. If a breach in privacy or IT security is noted as result of these audits all necessary state and federal reporting regulations will be adhered to.

**References:**

Registry User Agreement, 10/21/05; revised 01/13/06. (Template for licensed health care providers)

Registry User Agreement, 10/21/05; revised 01/13/06. (Template for health plans)

Physicians Medical Group of Santa Cruz County, *Audit Controls Policy, Implementation of the HIPAA Final Rule on Security*, April, 2005, pages 9 to 12.

**Policy:**

The CCCN Registry does not require patients to authorize or be notified before the patient is added to the CCCN registry. The CCCN is acting on behalf of Registry Users and complies with federal and state regulations regarding privacy and IT security based on limiting access to individual patient data to providers who have a verified treatment relationship.

The CCCN expects Registry User's to notify patients about the Registry only if required by the user's policies and procedures for privacy and confidentiality as well as applicable state and federal regulations.

In order to build patient knowledge and trust about the CCCN Registry, Registry Users are encouraged to provide information about the Registry when the User determines it is appropriate. This information will include the right of the patient to opt out of the Registry.

If a patient requests to opt out of the Registry or limit Registry information/access, the User will notify CCCN staff as soon as possible. When requested, CCCN staff will promptly remove a patient from the Active Registry. For a request to limit patient information and/or access, CCCN staff will promptly notify the User if CCCN is able to accommodate this request.

**Procedure:**

1. CCCN staff will develop Fact Sheets for patients and providers about the CCCN Registry including privacy and IT security safeguards. The patient Fact Sheet will be available in English and Spanish and will include information about the patient's right to opt out of the Registry in lay terms.
2. Information for patients about the benefits of the Registry and privacy and IT security safeguards will be provided during training and in reference guides available to all offices.
3. Registry Users will provide information to patients about the Registry when the User determines it is appropriate. Registry Users are encouraged to distribute Patient Fact sheets and other Registry Patient Education materials provided by CCCN.
4. If a patient requests that they want to be removed from the Registry and/or wants to limit Registry information or access by a specific provider, the User will notify CCCN staff. The notification will be done by secure messaging using the Remove Patient screen. If a patient is unable to make their own medical decisions; a person legally designated to make healthcare decisions for the patient may make this request.
5. For a request to opt-out of the Registry, CCCN staff will remove the patient from the Active Registry within one-working day.

6. For a request to remove specific Registry information and/or limit access by specific providers, CCCN staff will notify the requesting Registry User within one-week if CCCN is able to accommodate this request.

**References:**

Registry User Agreement, 10/21/05; revised 01/13/06. (Template for licensed health care providers)

Registry User Agreement, 10/21/05; revised 01/13/06. (Template for health plans)

*Provider Fact Sheet*, CCCN Clinical Committee 11/05.

*Patient Fact Sheet*, CCCN Clinical Committee, 01/06.

**Policy:**

The initial deployment of the CCCN Registry will include adult patients over the age of 18 with a diagnosis of Type I and Type II diabetes that reside in Santa Cruz County and/or have a Medical Home in Santa Cruz County. The clinical guidelines in the CCCN Registry are selected to be an appropriate baseline for this patient population.

Appropriate patients will be identified by Registry Users using criteria developed by the CCCN Clinical Committee. Patients will be added to the Registry from electronic reports whenever feasible. In addition, licensed providers can add patients with whom they have a treatment relationship to the CCCN Registry.

**Procedure:**

1. The CCCN Clinical Committee will review Registry Patient Selection criteria on an annual basis and revise as appropriate.
2. The CCCN Patient Selection criteria in an electronic format will be provided to all organizations identifying patients for the CCCN Registry based on claims data. This includes Registry Users, providers and health plans, and other third party payers.
3. Registry users will also be able to add patients within the CCCN Registry application on the Add Patient screen. The user will be required to provide the patients first and last name, date of birth, address, and Medical Home/PCP. The User will also attest the licensed provider who has a treatment relationship with the patient and has determined that the patient should be appropriately added to the Registry.

**References:**

Registry User Agreement, 10/21/05; revised 01/13/06. (Template for licensed health care providers)

Registry User Agreement, 10/21/05; revised 01/13/06. (Template for health plans)

*Registry Patient Criteria*, CCCN Clinical Committee 03/05.

**Policy:**

Registry patients who no longer meet the criteria for inclusion in the Registry will be given an inactive status by CCCN staff upon a validated request from the Medical Home/PCP.

Criteria for deactivating patients are as follows:

- Patient does not have diagnosis of diabetes
- Patient is deceased
- Patient has moved out of the area
- Patient has requested an informed refusal to participate in the Registry

The patient record of deactivated patients will be kept in a separate data base and can be accessed for patient reports as appropriate. In addition, the patient record can be reactivated at the attestation of a licensed healthcare provider that the patient should be added to the registry and the provider has a current treatment relationship with the patient as specified in the above policy and procedure on **Adding Patients**.

**Procedure:**

1. An authorized user of the CCCN Registry indicates a patient to be "removed from active Registry" by using the Remove Patient from Registry option in the Registry application or by faxing a completed form to the CCCN Help Desk. If the authorized user is not a licensed provider, the user will indicate the name of the licensed provider authorizing the patient be removed from the registry.
2. CCCN staff will review the request to verify that the reason for deactivation falls within the criteria for removal.
3. The authorized user requesting this is informed by secure email or fax that the patient was "removed from active registry".
4. If the patient is an currently enrolled in a health plan of the Central Coast Alliance for Health (CAAH), a designated staff member of the CCAH will be notified by CCCN that the member is no longer in the active Registry and the reason for removal.
5. Data for deactivated patients will remain available for administrative reports.
6. The Registry user may also request that a patient be returned to the Active Registry.

**References:**

Registry User Agreement, 10/21/05; revised 01/13/06. (Template for licensed health care providers)

Registry User Agreement, 10/21/05; revised 01/13/06. (Template for health plans)