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<b>Document Name:</b>	HIE Security and Maintenance Policy				
<b>Document Code:</b>	POL-ADM-0027-A			<b>Formerly:</b> (if applicable)	See below
<b>Approval Authority:</b>	Board of Directors	<b>Adopted:</b>	1/26/2021	<b>Reviewed:</b> <b>Frequency:</b>	Annually
<b>Responsible Executive:</b>	Melissa Kotrys	<b>Revised:</b>	See below		
<b>Responsible Office:</b>	Administration	<b>Contact:</b>	Melissa Kotrys		
<b>Distribution:</b>	<b>X</b> - Staff   <b>X</b> - Participants <b>X</b> – Vendors   <b>X</b> - Public	<b>Posted Location s:</b>	<b>X</b> - Internal Policy Library <b>X</b> - Public Website		

## 1. Purpose

The purpose of this policy is to describe the security and maintenance practices that are reasonable and necessary to protect the confidentiality, integrity, and availability of Data, and to maintain and improve the health IT performance of the HIE.

## 2. Scope

This policy applies to Health Current and Participants.

## 3. Definitions

See Definitions Policy.

## 4. Policy

### 4.1 Security Procedures

4.1.1. Health Current and Participants are committed to Data security. In connection with HIE services, Health Current and Participants will use administrative, physical and technical security measures—such as access controls, authentication measures, auditing procedures and security incident reporting—that meet applicable legal requirements, security and reporting obligations in the Participation Agreement, and best security practices in the Healthcare industry.

4.1.2. Participants must also follow Health Current’s security protocols and related measures with respect to Participants’ use of HIE services, such as minimum username/password requirements, authentication procedures, and access termination requirements. These security measures are all directly related to safeguarding the confidentiality and integrity of Data by mitigating the risk of access by unauthorized persons, see [45 C.F.R. 164 Subpart C](#).



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### 4.2 HIE Downtime, Maintenance and Updates

- 4.2.1 For the HIE to perform properly and efficiently, it must be maintained, and in some instances improved, which may require that the HIE be taken offline or performance degraded temporarily. There may also be security incidents, serious environmental events, or Data corruption/technical errors that give rise to a substantial risk of harm to individuals, that may require Health Current to take similar action with respect to the entire system or to specific Participants affected by a security or Data corruption/technical error.
- 4.2.2 Consistent with Health Current's obligations in the Participation Agreement, Participants understand and acknowledge that the HIE may be temporarily unavailable, or performance may be degraded temporarily, for any of the following reasons, including but not limited to:
  - 4.2.2.1 Performing routine (e.g., weekly) scheduled maintenance,
  - 4.2.2.2 Performing scheduled updates,
  - 4.2.2.3 Performing unscheduled maintenance and updates necessary to protect the health IT infrastructure of the HIE and/or to safeguard the confidentiality, integrity, or availability of Data,
  - 4.2.2.4 Performing batch updates to patient or member panels or other Data queries necessary to HIE operations,
  - 4.2.2.5 Addressing suspected or mitigating known security incidents,
  - 4.2.2.6 As a result of serious environmental or other events, or
  - 4.2.2.7 Substantially reducing a risk of harm to the life or physical safety of a natural person, which arises from Data that is known or reasonably suspected to be misidentified or mismatched, corrupt due to technical failure, or erroneous for another reason.

### 5. Compliance

Health Current management will enforce this policy. Violations may result in disciplinary action, which may include suspension, restriction of access, or more severe penalties up to and including termination of employment or HIE participation. Where illegal activities are suspected, Health Current may report such activities to applicable authorities.

### 6. Who Should Read this Policy?

- 6.1. Health Current HIE Participants
- 6.2. Health Current Staff
- 6.3. Health Current HIE Subcontractors

### 7. Reference/Citation

Embedded.

### 8. Cross Reference and/or Attachments



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**Revision Table**

<b>Version</b>	<b>Date</b>	<b>Description of Change</b>	<b>Revised By</b>
A	1/26/2021	Adopted HIE Participant Policy Manual including this HIE Security and Maintenance Policy.	Board of Directors