

**TITLE: Data Custodian Roles and Responsibilities**

Category: Technical Support	
Original Effective Date: 1/09/08 Revision Date:	Review Date: December, 2007

The Participant Data Custodian performs a critical link between the Participant, its Authorized Users, the Barton IS Help Desk, and ACCEL. The Data Custodian has the following roles and responsibilities:

- Manage the User Set Up process according to the policy:
  - Review the Authorized User Confidentiality Agreement with the Requesting User and Confidentiality of Patient Information Policy and clarify any questions.
  - Assist the Participant Requesting User to fill out the ACCEL User Set Up Application.
  - Confirm that:
    - the Requesting User has a legitimate affiliation with the Participant (employee or agent ie contractor, trainees, and volunteers) whose responsibilities require access to ACCEL systems; and
    - the security level requested is appropriate given the Requesting User's responsibilities.
  - Transmit the ACCEL User Set Up Application to the Barton Help Desk.
  - Receive the Authorized User's Unique Identification Code and Password from the Barton Help Desk and then communicate it to the Authorized User.
  - Retain originals of the following User Set Up forms:
    - ACCEL User Set Up Application
    - Signed Authorized User Confidentiality Agreement
  
- Manage User Access according to the policy:
  - Maintain a current master list of all Data Custodians and Authorized Users for their Participant/Agency and Unique Identification Codes.
  - Validate the Participant's master list with the Barton IS Help Desk and ACCEL quarterly.
  - Notify the Barton IS Help Desk for any status changes of Participant's Authorized Users.
  - Oversee that Authorized Users are using patient information obtained from ACCEL appropriately and within ACCEL's policies and procedures.
  
- Depending on the assessment of the Barton IS Help Desk and/or the Barton IT Director, the Data Custodian may be the first line of contact for ACCEL System issues.
  
- Receive reports of potential compromise of User Identification Code(s) from Participant's Authorized Users, investigate as needed, and report outcomes to the Barton IS Help Desk.
  
- Ensure that Authorized users receive appropriate training on ACCEL Care Pathways, EMPI and associated privacy and security policies.