

TITLE: User Access

Category: Privacy and Security	
Original Effective Date: 12/10/07 Revision Date:	Review Date: November, 2008

ACCEL and its Participants will implement a reliable means to manage the granting and removing of access privileges for Authorized Users to the data contained in the ACCEL System.

A. Authorizing and Requesting Access

The Barton IS Help Desk will maintain a list of Authorized Users to the ACCEL System. Access and termination of access to data by Authorized Users for each Participant will be managed by a formal requesting process, in which an authorized request to add or remove any Authorized User is sent to the Barton IS Help Desk by the Participant. The Participant is responsible for determining the security access level of each Authorized user.

1. Each Participant must designate one or more individuals who can authorize other individuals affiliated with the Participant to submit or have access to the ACCEL System. The role performed by these designating individuals is that of "Data Custodian" for the Participant and for data maintained on the ACCEL System.
2. Each Participant will be responsible for maintaining with ACCEL a currently valid list that contains a) the Data Custodian(s); and b) all Authorized Users. ACCEL and each Participant will validate this list at least quarterly at a time mutually acceptable to the Participant and ACCEL. Any changes to the status of an Authorized User must be communicated immediately to the Barton IS Help Desk who is responsible for updating the ACCEL System as soon as possible.
3. ACCEL will provide appropriate forms for enrolling an individual as an Authorized User. Each Participant will allow access to the ACCEL System only by those workforce members, agents, and contractors who have a legitimate and appropriate need to use ACCEL and/or release or obtain information through ACCEL. Each Participant is responsible for determining the security access level of an Authorized User.

Each Participant's Data Custodian will ensure that the Authorized User has completed such forms prior to receiving access to the ACCEL System. (See User Set Up Policy.) Forms can be faxed to the Barton IS Help Desk at _____ or emailed at _____. Each Data Custodian will retain originals of such forms.

The Barton IS Help Desk will provide each Participant Authorized User a unique user identification and password to access ACCEL Systems.

- 4. Discipline for Non-Compliance:** Each Participant will implement procedures to discipline and hold Authorized Users accountable for ensuring that they do not use, disclose, or request health information except as permitted by ACCEL Policies and Procedures. Such discipline measures may include, but are not limited to, retraining where appropriate, verbal and written warnings, demotion, and termination.

Access Removal

Each Participant Data Custodian will notify the Barton IS Help Desk of removal of an Authorized User from its list of ACCEL System Authorized Users. Participant will take such actions as are within its systems and control with respect to such formerly authorized user to suspend, inactive, or terminate the individual's access to ACCEL.

Following receipt of notice from the Participant, ACCEL will take actions within its systems and control to suspend, inactive, or terminate the individual's access to the ACCEL System.

ACCEL may remove an Authorized User's or Participant's access to the ACCEL System as it deems necessary in its sole discretion. Each Participant may request a review of such removal by ACCEL's Steering Committee.

Physical Security of the ACCEL System

Barton, as ACCEL's technology support center, is responsible for the physical safety and security of the iREACH application servers and all its supporting hardware and infrastructure components. In addition, policies and procedures pertaining to the physical security of the ACCEL System will be reviewed annually.