

**DOCUMENT 6:
ALASKA CHARTLINK FORM IDENTIFICATION AND
AUTHORIZATION VERIFICATION POLICY AND PROCEDURE**

ALASKA CHARTLINK: Identification and Authorization Verification Policy and Procedure

Policy/Procedure: Identification and Authorization Verification for CHARTLINK Users

Issue Date:

Distribution:

Approved by:

ALASKA CHARTLINK safeguards the privacy of Protected Health Information. All Provider Agency (“Provider”) personnel involved in the Use or Disclosure of Protected Health Information through ChartLink shall be familiar with this Policy and shall comply with this Policy at all times.

I. Purpose

The purpose of this policy is to establish standards for identifying and verifying persons authorized to access the Alaska ChartLink Health Information Exchange (Alaska ChartLink). Proper identification of authorized persons (and exclusion of unauthorized persons) will ensure the privacy of protected health information accessible through Alaska ChartLink. Additionally, adherence to this policy and procedure will ensure compliance with the identity verification requirements of the Alaska ChartLink Provider Agreement.

II. Scope

This policy applies to the following personnel: all persons who receive access to ChartLink through the Provider, including, but not limited to, medical records personnel, information technology and support center personnel, medical staff, and employees involved in health care operations. This policy covers the minimum necessary standards for identification and verification of persons permitted to access Alaska ChartLink. Providers who participate in Alaska ChartLink may enact procedures that are more stringent than this policy, but must not allow those procedures to conflict with, or be less restrictive than this policy.

III. Policy

This policy applies to any person permitted to access Alaska ChartLink through this entity’s access portal. It does not apply to patients or clients of this entity, who will be supplied access individually through Alaska ChartLink. Each person accessing Alaska ChartLink must be verified prior to receiving a passcode or other necessary tools for access to the system. Because this system is allowing access to health information not owned or controlled by this entity, the general exceptions to required verification, such as exceptions for clergy, do not apply.

IV. Procedure

- a. Prior to receiving a passcode or other necessary tools for accessing Alaska ChartLink, a person must have both their identity and authority verified in accordance with the procedures described below.

- b. The following forms of identification are sufficient for verifying a person's identity:
 - i. Official and valid state ID (driver's license, state ID card);
 - ii. Official and valid federal ID (passport, military or government ID); or
 - iii. Official and valid entity-issued picture ID.
- c. The following items are sufficient for verifying a person's authorization to access Alaska ChartLink:
 - i. Entity-issued ID indicating authorization to access Alaska ChartLink;
 - ii. Authorization on official entity letterhead from the Privacy Officer or other person designated to determine access levels for Alaska ChartLink; or
 - iii. Email authorization from the official entity email address of the Privacy Officer or other person designated to determine access levels for Alaska ChartLink.
- d. If a person provides sufficient documentation to meet the requirements of subsections (b) and (c) above, a passcode or other necessary tools for accessing Alaska ChartLink may be issued. At the time of issuance, the person supplying the passcode or other necessary tools should place a copy of the identification and authorization documents in the designated Alaska ChartLink Verification File.
- e. If a person provides any other type of identification or authorization (student ID, court order, etc.), please contact the Privacy Officer or other person designated by this entity to determine access levels for Alaska ChartLink.
- f. The majority of persons requiring access to Alaska ChartLink should have their identification and authorization verified prior to any necessary use of the system. For this reason, emergency access to Alaska ChartLink should not be necessary. If, however, a person requests emergency access, the entity should contact an on-call provider with access to the system to assess the totality of the situation on a reasonableness basis.

Provider Obligations:

Providers who participate in ChartLink may be asked at any time to provide evidence of compliance with this policy, and to validate that appropriate policies and procedures are in place to comply with this policy. Providers may also be required to provide ChartLink with a list of active staff members with access to ChartLink, in accordance with the Provider Participation Agreement. Providers must at all times comply with the Provider Participation Agreement, including any actions taken by ChartLink in accordance with such agreement.

Who to Contact with Additional Questions:

The requirements and illustrations listed above are not intended to be complete explanations of ChartLink's safeguards for identification and authorization of personnel. If you have any questions regarding this Policy, you should contact your supervisor, the Privacy Officer, or the Privacy Manager. If necessary, they will direct you to the appropriate ChartLink personnel for additional questions.