

## **Workforce Member Access to Their Own Electronic Protected Health Information (“ePHI”)**

**Effective Date:** July 2023

### **Policy Statement**

In accordance with the Minimum Necessary requirements of the HIPAA Privacy Rule, Workforce Members should only access and use the Electronic Health Record (“EHR”) to perform their assigned clinical or business tasks to fulfill their specific job duties and assignments.

### **Reason(s) for the Policy**

This policy provides guidelines for the appropriate access and use of Protected Health Information (“PHI”) that is stored, managed, and/or maintained in the EHR, including systems or applications that interface with Epic (e.g., pathology reports) and the business record.

### **Primary Guidance to Which This Policy Responds**

HIPAA Security Rule Authentication Access Control and Authorization 45 C.F.R. § 170.315(d)(2)

### **Responsible Parties**

Privacy Officers of Columbia University Irving Medical Center, NewYork-Presbyterian and Weill Cornell Medicine,

### **Revision History**

Issued: January 2020

Revised: July 2023

### **Who is governed by This Policy**

Columbia University, NewYork-Presbyterian, and Weill Cornell Medicine participate in an Organized Health Care Arrangement (OHCA). The OHCA designation permits the organizations to share health information of patients to conduct treatment, payment and joint health care operations relating to the OHCA, including integrated information system management, health information exchange, financial and billing services, insurance, quality improvement, and risk management activities.

This policy applies to all employees, faculty, medical staff, volunteers, students, vendors, and other persons performing work for or on behalf of Columbia University, NewYork-Presbyterian and Weill Cornell Medicine and Columbia University (“Workforce Members”).

### **Who Should Know This Policy**

All Columbia University Workforce Members

## Policy Text

To protect the privacy, confidentiality, and integrity of the EHR, Workforce Members should only access the EHR to perform their assigned clinical, research or business tasks to fulfill their specific job duties and assignments related to Treatment, Payment, Health Care Operation (TPO) reasons. Accessing their own PHI is not covered by access for TPO reasons. Workforce members that are granted access to the EHR should not access their own medical information.

1. Workforce Members should not view or alter their own medical information directly within Epic. This includes printing or exporting information, updating contact or insurance information, scheduling tests or appointments, engaging with providers, ordering tests, self-prescribing medications, or viewing notes, test results and reports.
2. Workforce Members should not access the medical information of their child or another adult patient (e.g., spouse, adult child, other adult family member) directly within Epic outside of an assigned job role. Workforce Members may request proxy access to a patient's record through the secure patient portal. If you require assistance, contact the Privacy Office [privacy@cumc.columbia.edu](mailto:privacy@cumc.columbia.edu)
3. Workforce Members should only access their own health information using the secure patient portal or by contacting the appropriate Health Information Management (HIM) / Release of Information (ROI) Department. Use the link found below to access your health information via the patient portal.

Patient Portal information: <https://www.myconnectnyc.org/MyChart/>

Workforce Members will be subject to disciplinary action if impermissible access is confirmed in accordance with the organization's discipline and/or sanction policy for privacy violations. If the access results in the compromise of PHI, actions will be taken based on regulatory requirements.

## Responsibilities

It is the responsibility of Workforce Members granted access to the EHR to comply with this policy.

## Definitions

**Access** – Access to medical information is guaranteed under the Health Insurance Portability and Accountability Act (HIPAA) of 1996. Access means the right to examine and copy medical records. As a patient, you have the right to access your own medical information via the patient portal (Connect/MyChart) or by written request through Health Information Management (HIM) via a release of information in accordance with this policy.

**Electronic Health Record** - An electronic health record (EHR) is a digital version of a patient's medical paper chart, including all systems and applications that store, manage, process, use, transfer, or maintain PHI.

**Workforce Member** - employees, faculty, medical staff, volunteers, students, vendors, and other individuals at or affiliated with one of the entities, whose work is under the direct control of one of the entities regardless of whether they are paid by one of the entities.

**Contacts**

Privacy Officers of Columbia University, NewYork-Presbyterian and Weill Cornell Medicine

**Cross References to Related Policies**

[HIPAA Privacy Rules and Patient Rights](#)

[Notice of Privacy Practices](#)

[Privacy and Information Security Sanction Policy](#)

[Minimum Necessary Rule](#)

[Use and Disclosure of Protected Health Information](#)

[Authorization to Use and Disclose Patient Information](#)

**Web Address**

<https://www.hipaa.cuimc.columbia.edu/hipaa-policies>

<https://www.columbiadoctors.org/patients/medical-records>