

**TITLE: WORKFORCE MEMBER ACCESS TO THEIR OWN ELECTRONIC
PROTECTED HEALTH INFORMATION ("ePHI")**

POLICY:

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

PURPOSE:

This policy provides guidelines for the appropriate access of Protected Health Information ("PHI") that is stored, managed, and/or maintained in the EHR including systems/applications and the business record ("EHR").

APPLICABILITY:

This policy applies to employees, faculty, medical staff, volunteers, students, vendors, and other persons performing work for or on behalf of The Rogosin Institute ("Rogosin").

PROCEDURE:

1. To protect the privacy, confidentiality, and integrity of the medical record, Workforce Members should only access the EHR to perform their assigned clinical or business tasks to fulfill their specific job duties and assignments.
2. If impermissible access is confirmed, the Workforce Member may be subject to disciplinary action in accordance with each organization's respective discipline and/or sanction policy for privacy violations. If this access results in the compromise of PHI, actions will be taken based on regulatory requirements.
3. Workforce Members may access their 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/>
4. It is the responsibility of Workforce Members who have been granted access to the EHR to comply with this policy.

RESPONSIBILITY:

Privacy Officer

REFERENCES:

Rogosin Code of Conduct
Notice of Privacy Practices
Rogosin Policy C140 - Corrective Action to Deter Violation of Privacy and Security
Rogosin Policy L125 - Minimum Necessary
Rogosin Policy L135 - HIPAA Breach Notification
Rogosin Policy H118 - Release of Information - Patient Access
Rogosin Privacy and Security Policies
Health Insurance Portability and Accountability Act of 1996, 45 C.F.R. 164.514(f)

DEFINITION:

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 workforce member, you have the right to access your own medical information via the portal or by written request through HIM/ROI 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.

POLICY DATES:

ISSUED: June 2020

REVIEWED: February 2022; February 2024, **January 2025**

REVISED: April 2023

APPROVED BY:

VP - Chief Corporate Compliance Officer