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# Access Authorization Policy

## 1. Introduction

a. Clark County has adopted this Access Authorization Policy to comply with our duties under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), the Department Health and Human Services ("DHHS") security and privacy regulations, the Joint Commission on Accreditation of Healthcare Organizations ("JCAHO") accreditation standards, as well as our duty to protect the confidentiality and integrity of confidential medical information as required by law, professional ethics, and accreditation requirements.

b. This policy governs how personnel become authorized to access individually identifiable health information and to the system components that contain such data. All personnel must comply with this policy. Familiarity with this policy and demonstrated competence in the requirements of the policy are an important part of every employee's responsibilities.

## 2. Policy

a. Access authorization is the process of determining whether a prospective data user should be granted access to Clark County's data. A data user is a person who has been granted explicit authorization to access Clark County's data. Access must be granted in accordance with this Access Authorization Policy and other related policies.

b. Data users must comply with the following requirements:
   i. Use the data only for purposes authorized by Clark County.
   ii. Comply with all policies and procedures governing health information promulgated by Clark County.
   iii. Not disclose data unless authorized to do so.

c. The appropriate department heads/supervisor will determine which personnel get access to health information in accordance with this Access Authorization Policy. In making such determinations, the department head/supervisor will follow these guidelines:
   i. Prospective data users will not get access unless they have a need for access.
   ii. Prospective data users will get only the minimum access necessary to perform duties requiring such access.
   iii. Health care providers, such as physicians and nurses, will have access only to data of patients that they have patient responsibility for, with an emergency override to access other patients' data to respond to emergencies.
   iv. Access will be limited to necessary tasks, such as read only, read and copy, or read and edit by adding a new entry.
   v. Electronic signatures must comply with Clark County's electronic signature policy.

d. The department head/supervisor will submit names of personnel needing access with recommended levels of access to the Personnel department.

e. The department head/supervisor will ensure that all prospective data users receive required training as specified in Clark County's Personnel Security and Training Policies and annotate such training on the submission. If access is needed before training can be completed, the department head/supervisor will annotate such, the reason why, and the date such training will be completed. All required training must be completed within 30 days of the receipt of access.
f. The Personnel department will grant such requests in accordance with this Access Authorization Policy and Clark County's Access Establishment Policy.
g. Access modifications must be accomplished in accordance with Clark County's Access Modification Policy.
h. Termination of access must be accomplished in accordance with Clark County's Termination Procedure.