POLICY INFORMATION

<table>
<thead>
<tr>
<th>Document #</th>
<th>Title: Breaking the Glass</th>
<th>Original Effective Date: 7/8/2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>500.1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Standard:</td>
<td>Approved by: Dean Beth E. Foley</td>
<td>Date Reviewed: 7/23/2019</td>
</tr>
<tr>
<td>HIPAA</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I. POLICY STATEMENT

CEHS credentials workforce members into the Electronic Medical Record (EMR) based upon their roles and responsibilities. The EMR will be treated in a confidential manner and only accessed for appropriate purposes. CEHS recognizes there may be times when a workforce member in one clinic will legitimately need to access the PHI of a patient who is being seen in another clinic for treatment purposes. This policy establishes requirements for workforce regarding “Breaking the Glass” from one security division into another security division.

II. DEFINITIONS

Breaking the Glass (BTG) - refers to a quick means for a provider who does not have privileges to certain information to gain time-limited access to the client’s EMR when necessary for treatment purposes.

See CEHS HIPAA Privacy Policy 100

III. AUTHORITY AND RESPONSIBILITIES

CEHS has component units that are listed as a hybrid entity in accordance with USU’s HIPAA Hybrid Covered Entity Declaration. Only the health care component/HCC (i.e., covered functions) of CEHS must comply with this policy. All references in this policy to “CEHS” shall be construed to refer only to the health care components of CEHS.

IV. PROCEDURES TO IMPLEMENT

Examples of Acceptable Reasons for Breaking the Glass (BTG)

1. Client is currently, or will be, treated in more than one clinic and access is needed for treatment purposes. Only the minimum information should be accessed.
2. Client has been seen in one clinic and that clinic referred the client to another clinic for treatment.

Examples of Unacceptable Reasons for Breaking the Glass

2. Any other reason that does not fall under valid treatment purposes.

Breaking the Glass

1. Upon clicking on the “break the glass” link in the patient chart, the user will be prompted with a warning screen.
2. If the user chooses to continue, the user will be prompted to provide the reason access into another security division is needed. The user must provide a valid reason for accessing the information. All valid reasons for access will relate to treatment of the client. Currently, the EMR allows a maximum of 50 characters in the reason box. Users should provide as much detail as possible in a succinct manner. Examples of appropriate documentation include the following:
   a. Treatment. I’m part of an interdisc team with [Clinic].
   b. Treatment. Consult requested by [Provider Name].
   c. Treatment. New pt. ref by [Clinic or Provider Name].
3. After entering the reason, the user will select the security division(s) for which access is needed.
4. The EMR will allow the user to “break the glass” and access the patient record. The record will be available for 24 hours. After the 24-hour timeframe, the user will need to BTG and complete the process again.

The EMR tracks all documents the user accessed and edited as well as the length of time spent in each document.

Monitoring Process

1. The compliance department will monitor the use of BTG on a regular basis.
2. It is the responsibility of the compliance department to create training regarding this policy.
3. It is the responsibility of the EMR administrator to train workforce regarding the process of breaking the glass.

Violation of Break the Glass Policy

The actions of CEHS workforce members who fail to comply with this policy will be decisioned in accordance to the CEHS HIPAA Policy 201-Sanctions.

V. ATTACHMENTS

N/A

VI. REFERENCES

CEHS HIPAA Policy 500- Information Access Management

CEHS HIPAA Policy 201- Sanctions