

5.15 West Virginia Health Information Network Authorized Users, Access, and Audits

POLICY:

The West Virginia Department of Health and Human Resources (DHHR), Bureau for Public Health (BPH), Office of Nutrition Services (ONS) and the West Virginia Health Information Network (WVHIN) requires all qualified West Virginia WIC staff (Authorized Users) to access only relevant participant information, when authorized by the participant, parent, guardian, or caretaker, and maintain participant confidentiality.

The Office of Nutrition Services (ONS) – West Virginia WIC State Agency will approve users of and monitor all authorized users accessing the WVHIN. The State Agency will also be responsible for annual training, ensuring compliance with the WVHIN policies and applicable law.

DEFINITIONS:

WVHIN Authorized User Form (Attachment #1): The document utilized to request activation, deactivation, or alteration of an Authorized User's WVHIN access roles.

West Virginia Health Information Network (WVHIN): The WVHIN provides health care professionals a secure network to share medical information and data.

PROCEDURE:

A. WVHIN Authorized Users

1. Nutritionist/Nutrition Associates (CPA) and WIC staff who are qualified to serve as a Medical Liaison (ML) are eligible to become WVHIN Authorized Users.
2. Authorized Users must be approved by the State Agency.
3. Eligible Authorized Users must complete **Section I.** of the **WVHIN Authorized User Form** and submit to their Local Agency Director or Designee:
4. The Local Agency Director must complete **Section II. a.** of the **WVHIN Authorized User Form (Attachment #1)** and submit to the State Agency Security Coordinator for review.
5. The State Agency Security Coordinator will approve **Section III.** of the **WVHIN Authorized User Form (Attachment #1)** and will return the completed form to the Local Agency Director.
6. To activate, deactivate, or alter an Authorized User's access to the WVHIN, the **WV WIC Authorized User Form (Attachment #1, Section II.)** must be completed and submitted to the State Agency.

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- a. The State Agency will revoke an Authorized User's access to the WVHIN at their separation from the West Virginia WIC Program.
- b. The Local Agency Director must immediately notify the State Agency if an Authorized User has separated from the West Virginia WIC Program.

B. WVHIN Participant Data Access and Confidentiality

1. Only Authorized Users can access the WVHIN.
2. The WVHIN should only be accessed to collect the relevant participant data needed to complete the WIC certification, mid-certification follow-up or high-risk follow-up appointment.
 - a. Participant data cannot be altered.
 - b. Participant data must be accessed in compliance with HIPAA Notice and Privacy Practices.
 - c. Participant data retrieved from the WVHIN cannot be shared with any programs or organizations that do not have access to the WVHIN.
3. If a WIC participant, parent, guardian, or caretaker chooses to opt out of WIC authorization access to WVHIN, WIC staff must document this as a **Crossroads Family Alert**.
 - a. The participant, parent, guardian, or caretaker may opt into WIC authorization access to WVHIN at any time.
 - b. WIC staff will not access WVHIN participant data for any reason if the participant, parent, guardian, or caretaker has opted out.
 - c. WIC benefit must not be withheld if a participant, parent, guardian, or caretaker opts out of the WVHIN.

C. Unauthorized Use of the WVHIN

1. Unauthorized WIC staff use of the WVHIN include:
 - a. An Authorized User accesses data for someone other than a WIC participant.
 - b. An Authorized User accesses data for a WIC participant who has opted out of the WVHIN.
 - c. A WIC staff member who is not an Authorized User accesses the WVHIN.

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2. The State Agency will investigate all identified potential occurrences of unauthorized use.
 - a. The State Agency will notify the Local Agency Director and the WVHIN of potential unauthorized use.
3. At the completion of the investigation, the State Agency will report it's finding to the WVHIN, who can terminate or suspend any user.

D. State Agency Monitoring

1. The State Agency Program Integrity Coordinator, and other State Agency monitoring staff, will conduct a monthly audit, reviewing ten percent (10%) of the participant records.
 - a. Participant records include the review of the Authorized User Report, the ARHI Form and WVHIN data.
2. The State Agency is responsible for annual training, ensuring compliance with the WVHIN policies and applicable law.

Note: Authorized users, who are accessing the WVHIN must sign the **West Virginia WIC - WVHIN Acknowledgement Form (Attachment #6, Policy 5.16)**.

ATTACHMENTS:

1. WVHIN Authorized User Form