

Allow WISHIN to Verify a Minimum Set of Safeguards

Prior to WISHIN granting an organization access to WISHIN Pulse and/or WISHIN Direct+ (the "Systems"), the organization must have the following minimum set of administrative, technical, and physical safeguards in place to preserve the integrity and privacy of electronic personal health information being accessed through the Systems. Upon WISHIN's request, the participating organization must provide WISHIN with a copy of its policies and/or procedures which confirm it has established each of the safeguards in this document.

Identification of Privacy and Security Officers

- Identify the organization's Privacy Officer
- Identify the organization's Security Officer

Security and Training of Workforce Members

- While not required, WISHIN encourages the organization to perform criminal background checks on workforce members prior to hire
- Provide HIPAA privacy/security training on hire or at orientation
- Provide ongoing HIPAA/privacy security training
- Require signed confidentiality and computer access agreements by workforce members and have them on file

Security of Data Access

- Assign workforce members unique user ids
- Assign workforce members unique and complex passwords
- Prevent the use of generic passwords for EHR/EMR/WISHIN Systems access
- Have an established termination process in place for workforce members, including notification to the EHR/EMR/WISHIN Systems administrator to remove a terminated workforce member's access

Audits, Privacy Violations, and Security Incidents

- Have a program in place for auditing EHR/EMR/WISHIN Systems access
- Have a process in place for reporting and investigating privacy violations
- Have a process in place for reporting and investigating security incidents
- Provide the names and positions of each workforce member granted access to the Systems
- Perform regular security risk assessments to identify the potential risks to and vulnerabilities of electronic protected health information



DOCUMENT REVISION HISTORY

Date	Modifier	Summary of Modifications
7/23/2013	WISHIN	Original published document.
9/30/2013	WISHIN	Reviewed to ensure consistency with Participation Agreement; no changes needed.