Texas Tech University Health Sciences Center El Paso
Institutional Compliance Procedure

Procedure: Vendor Access Audit	**Procedure #:** HSCEP OP 56.10.08, PRO A
Effective Date: September 28, 2023	**Last Revision Date:**
References: HSCEP OP 56.10.08, Vendor Access, Breach Notification Rule, 45 CFR Section 164.400-414 State of Texas Section 521.053(i) and (j) Business and Commerce Code	
TTUHSC El Paso Institutional Compliance Website: http://elpaso.ttuhsc.edu/compliance/	

Procedure Statement:

It is the policy of Texas Tech Health Sciences Center El Paso (TTUHSC EP) to ensure the confidentiality, and integrity of Protected Health Information (PHI). The purpose of this procedure is to guide the Compliance and Medical Records staff in monitoring and tracking access to PHI by outside vendors and/or payors.

Scope

Compliance and Medical Records staff will audit access to TTHUHSC El Paso Medical Records by an outside auditor conducting HEDIS and Risk Adjustment reviews of patients in the electronic medical record. This procedure applies to all vendors or payors requesting access to Electronic Medical Records.

Procedure

1. Request patient list from the vendor (auditor) requesting access to Electronic Medical records in an Excel format.

2. Request vendor eraider and grant access to Electronic Medical Records for the duration of the audit.

3. Request Vendor Access Report through SYSAID application by providing vendor eraider and date of the audit for both Cerner and Athena Flow Electronic Medical Records application.

4. Create audit scope and tool for each auditor. The audit scope will include the background and scope of the audit, key risks, testing methodology, findings, conclusion, and recommendations.

5. The audit tool will include the following:

   - Patient Name
   - Medical Record Number
   - Date of Birth
   - FSC numbers
   - Payors
   - A YES or No question of chart access by the user
   - Chart access by event
   - Is the patient included in the list provided by the auditor?

- Was the chart accessed for business reasons?
- Is the FSC the payor that the auditor came to review?

6. Review and verify if vendor access was appropriate.

7. Investigate the reason the chart was accessed. If charts were accessed inappropriately-

- Terminate vendor access to Electronic Medical Records immediately
- Notify patients within 60 days of discovery
- Contact and collaborate with IT security to notify the Department of Health and Human Services (Office of Civil Rights) if 500 or more individual charts were accessed immediately
- Collaborate with IT and the Office of Institutional Advancement to notify the media if more than 500 charts were accessed
- For 250 Texas residents notify the attorney general no later than 30 days of discovery.

8. Document findings and recommendation(s).

9. Sign audit findings and forward them to the Institutional Compliance Officer

10. Attach all audit documents into the database.

Frequency of Review

This procedure will be reviewed and revised as needed by the designated Compliance personnel.

Review Date: September 28, 2023
Revision Date: