



Policy Name	CurrentCare – User Authentication Policy		
Policy Number	RISK-POL-2017	Version	8
Effective Date	02/16/2024		

PURPOSE

The purpose of this policy is to establish the standards by which the physical identity and credentials of users affiliated with registered provider organizations will be verified.

SCOPE

This policy applies to all departments and positions at all levels, including full-time, part-time, and temporary positions. This policy also applies to all CurrentCare users.

POLICY

As an essential step in protecting the confidentiality and accurate auditability of health information in CurrentCare, the physical identity of all individual users of the system must be verified as a function of user registration. Further, the currency and accuracy of user identity must be maintained to enable permissions to be correctly set and maintained in the system and to monitor access to CurrentCare at an individual level during all subsequent online sessions.

Delegated User Administrators in registered provider organizations are responsible for assuring: (a) the validity and accuracy of information provided to CurrentCare to establish the identity of users to be designated as affiliates of their respective organizations; (b) the currency and validity of professional credentials, especially as they relate to the appropriate assignment of the Licensed Independent Practitioner (LIP) role and Licensed Non-Independent Practitioner (LNIP) roles and; (c) the appropriate assignment of all other roles to affiliated personnel that they designate to be CurrentCare users. An LIP is a medical professional responsible for patient care decision-making including primary care providers, specialists, consultants, mid-level practitioners (midwives, nurse practitioners, physician's assistants, etc.), and others as appropriate. An LNIP is clinical support staff at the healthcare provider's facility (e.g., a registered nurse) or any individual able to view PHI according to the practice's policies and procedures.

Designated users will be assigned permission to use CurrentCare at the recommendation of the registered provider organization and at the discretion of the RIQI Operations Program Support staff.

Consistent with the terms of the Data Use Agreement executed by the provider organization, Delegated User Administrators or their designee in registered provider organizations are responsible for notifying the RIQI Operations Program Support staff, the RIQI Privacy Officer, and the RIQI Security Officer promptly upon the discovery of any improper activity related to the identity of any affiliated user that could subject the organization, its patients or other RIQI stakeholders to risk or harm. This requirement is in addition to all notice requirements in relating to the unauthorized access, use and disclosure of protected health information or a Security Incident set forth in the Data Use Agreement. Further, CurrentCare will accept notification by the State Board of Medical Licensure and Discipline in matters relating to provider misconduct as it relates to providers assigned the LIP or LNIP role and related online permissions.

RIQI will deactivate any user who has not logged into their account within the past 6 months. If a user wishes to reactivate their account, the Delegated User Administrator is required to make this request after authenticating the user’s status at the organization.

RESPONSIBILITIES

Role	Responsibility
Senior Director, Programs/HIPAA Privacy Officer	Ensures compliance, dissemination, and administration of this policy.
All RIQI staff at all levels	Adheres to this policy and all associated procedures.
All participating ‘end-user’ organizations	Adheres to this policy and all associated procedures.

REVISION HISTORY

This section contains comments on any revisions that were made to this document and the date they were made.

Revision Number	Time	Name	Description
1	9/22/2009	XXXXX	Initial Version
2	11/29/2012		Minor language changes to Purpose section and Policy Statement section; Added Risk & Controls sections;
3	3/20/2014		Revision to control added
4	7/29/2014	Alok Gupta – CIO, COO	Removed Risk & Controls sections

Revision Number	Time	Name	Description
5	05/2017		Per Audit & Compliance/Policy & Legal Committee review: Minor revisions made to "Purpose" section
6	4/20/2021	Holly Stark, Senior Director, Finance & Operations	No Changes
7	7/11/2023	Neil Sarkar, President & CEO	Reviewed and approved; formatting changes
8	2/16/2024	Neil Sarkar, President & CEO	Updated to reflect a rolling 6-month lookback at user inactivity.

EXECUTIVE SIGN-OFF

Version 8

Neil Sarkar, PhD

February 16, 2024

Date