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Best Practices: Development and implement a training program for employees, staff members, agents, and contracts who will have access to SCHIEEx.

Reference: SCHIEEx Policy Manual Section 11b

Participants are required to develop and implement an initial and ongoing training program for its employees, staff members, agents, and contractors who will have access to SCHIEEx to ensure compliance with federal and state laws and regulations as well as the SCHIEEx Policy Manual.

The main goals of SCHIEEx training are to make clear the obligations of the staff on the appropriate and responsible use of SCHIEEx so they may become authorized users and to educate the staff so they may clearly and effectively introduce patients to SCHIEEx and answer any questions posed by the patients. A good SCHIEEx training program will include a basic overview of the technology model and operation of SCHIEEx and a detailed review of the SCHIEEx Policy Manual.

A Participant in SCHIEEx is likely a provider subject to the Health Information Portability and Accountability Act of 1996, as amended. As such, the Participant should have implemented policies and procedures that comply with the Privacy Rule and the Security Rule, including a training program covering the organization's privacy and security policies. Once the initial training on SCHIEEx is completed, it would be appropriate to incorporate SCHIEEx training into the organization's existing training program as many of the policies and documentation requirements are similar.

Prior to SCHIEEx training, it is a good practice to provide Participant employees, staff members, agents, and contractors who will have access to SCHIEEx a copy of, or access to, the SCHIEEx Policy Manual, User Agreement, and the Participation Agreement and Technical Overview so they may become familiar with the terms, policies, and obligations. All of these documents are available through www.schiex.org.

Participants must document and maintain documentation with regard to training, including a log of participants, the material covered, and the date(s) of training.

To become an authorized user of SCHIEEx, staff **must** complete training and execute a User Agreement prior to accessing SCHIEEx.

Sample Training Outline

1) SCHIEEx Overview

- a) DIRECT
 - i) Point-to-point electronic communication
 - ii) Directly between sender and receiver
 - iii) Information can be sent for any permitted purpose allowed by law related to health care
- b) EXCHANGE
 - i) Advanced and fully automated
 - ii) Exchange clinical information about shared patients
 - iii) Information exchange limited to treatment, public health, and quality reporting
- c) Federated Architecture Technology Model
 - i) No central repository of patient health information; it is not stored within SCHIEEx
 - ii) Patient health information remains with the provider just like paper medical records
- d) Participation Agreement
- e) Policy Manual (applicable Sections)
- f) Privacy/Security
- g) Suspected Errors
 - i) DIRECT – information intended for a different entity
 - ii) EXCHANGE or DIRECT – inaccurate information or information about the wrong patient
 - iii) Notify disclosing participant ASAP
- h) Obligations of Users
 - i) Use of SCHIEEx as necessary and in accordance with role-based controls
 - ii) Adhere to state and federal privacy laws
 - iii) Prohibits sharing password
 - iv) No expectation of privacy
 - v) Failure to comply results in loss of privileges or any other action deemed appropriate by Participant
- i) Execute User Agreements
 - i) Upon satisfactory completion of SCHIEEx training
- j) Documentation
 - i) Retain all relevant records related to
 - (1) Safeguarding patient information
 - (2) Patient participation, opt out, and cancel the opt out of SCHIEEx
 - (3) Compliance with SCHIEEx policy and state and federal laws and regulations

2) SCHIEEx DIRECT Responsibilities

- a) Fully comply with SCHIEEx Policy Manual
- b) Site Administrator
 - i) Authorize and assign DIRECT mailboxes

- ii) One per person, user name, password
- c) Follow internal policies and procedures to designate how accounts will be used, monitored, and how access will be controlled.
- d) Call other providers to confirm DIRECT address before sending first message.
- e) SCHIEx manages portal security; participant manages security when client email and EHR are used and for any computer or other device that information may be downloaded or saved.
- f) DIRECT security best practices
- g) *SCHIEx accounts must be monitored for incoming referrals and patient information.*

3) SCHIEx EXCHANGE Responsibilities as they relate to Patients

- a) Notify patients of SCHIEx EXCHANGE participation through the Participant's NPP containing SCHIEx language or a separate SCHIEx Notice
 - i) Obtain patient signature
 - (1) Written or signature pad
 - ii) Document if a signature was not received, the effort to obtain the signature, and why a signature was not obtained
 - iii) Retain signed Notice, in any format
- b) Exclude patient information for those who Opt Out /Execute the SCHIEx level Opt Out
- c) Exclude information that is specially protected by law
 - i) Most certified EHR systems provide the mechanism to comply with the Opt Out and protected information policies. SCHIEx Opt Out tool available.
- d) Preparation for staff to introduce patients to SCHIEx EXCHANGE and to respond to patient questions in a knowledgeable manner.
- e) Patient Forms and Resources
 - i) Patient brochure
 - (1) EHR, HIE, SCHIEx
 - (2) Advantages
 - (3) Permitted Uses
 - (4) Opt Out
 - ii) Notice of SCHIEx EXCHANGE Participation
 - iii) SCHIEx EXCHANGE Opt Out form
 - (1) Opt Out
 - (2) Cancel Opt Out

4) Talking to Your Patients

- a) *Points to Remember*
 - i) Patient participation in SCHIEx EXCHANGE is *voluntary* and a patient may opt out.
 - ii) Electronic health information can be shared *only with other providers who have a treatment relationship or are in the process of establishing a treatment relationship with the patient* and the provider is a SCHIEx participant.

- iii) Only *authorized users* can access use or share a patient's electronic health information
- iv) A patient's health information can be shared through SCHIEEx EXCHANGE for only three permitted purposes:
 - (1) Treatment
 - (2) As required by law
 - (3) Quality and care improvement
- v) A patient cannot choose what health information is or is not shared.
- vi) A patient cannot choose which providers can or cannot share his or her health information via EXCHANGE
- vii) Once a patient decides to participate, the doctor can access their medical information from his or her other doctors (If the other doctors participate in SCHIEEx EXCHANGE) *even if the patient hasn't had a recent appointment.*
- b) *YES, I will participate in SCHIEEx Exchange*
 - i) Signed Notice of Participation or NPP with SCHIEEx language.
 - ii) All of that patient's health information can be accessed, even if said patient may not have yet received a Notice from his or her other doctors.
- c) *No, I do not want to participate in SCHIEEx Exchange*
 - i) An Opt Out must be in writing.
 - ii) There will be no sharing of his or her electronic health information through SCHIEEx EXCHANGE, including in case of an emergency.
 - iii) A patient cannot Opt Out on a provider-by-provider basis.
 - iv) A patient may change his or her mind and Cancel the Opt Out.
- d) *I changed my mind and would like to participate in SCHIEEx Exchange*
 - i) The decision to Cancel the Opt Out must be in writing.
 - ii) Electronic health information then may be shared through SCHIEEx EXCHANGE....
 - iii) ... including electronic health information about care the patient received during the period he or she was Opted Out.