NEW YORK STATE OFFICE FOR THE AGING

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TECHNICAL ASSISTANCE MEMORANDUM **Number: 19-TAM-01**

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DATE: March 22, 2019

TO: Area Agencies on Aging Directors, PeerPlace Champions, NY Connects Local Administrative Agencies, NY Connects Coordinators, and Regional NY Connects ILC Grantees

SUBJECT: Providing Statewide Client Data System Workflow Path Access to Individuals Working with Two or More Jurisdictions

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PURPOSE:

The purpose of this Technical Assistance Memorandum (TAM) is to provide guidance regarding instances in which access has been requested for one individual into the Workflow Paths of two or more jurisdictions within the Statewide Client Data System. Individuals for whom these requests might be made include those working part-time for two separate Area Agencies on Aging (AAAs) or employees of an organization that has been contracted to provide services for more than one AAA. This also may include employees of a Regional Independent Living Center (ILC) that is performing NY Connects activities through contract with NYSOFA or an ILC subcontracted by a Regional ILC. In these circumstances, an individual may, at different times, be performing activities on behalf of one, two, or more jurisdictions.

Please note that this TAM differs from Program Instruction 18-PI-26: “Sharing of Access to NY Connects Workflow Paths only by NY Connects County Partners using the Statewide Client Data System.” First, 18-PI-26 is limited to NY Connects, while this TAM applies to all Workflow Paths in the Statewide Client Data System. This TAM contemplates circumstances in which an individual will be, at various times, working *directly* for two (or more) separate jurisdictional entities (including through contractors). There is *no sharing or disclosure of information between the two jurisdictional entities*, as they simply have a common employee or contractor. In contrast, 18-PI-26 addresses situations in which an individual continues to work for a single jurisdictional entity; any work done on behalf of the other entity is done through their employer, and *any information accessed by the individual is being shared between the jurisdictional entities*.

BACKGROUND:

The Statewide Client Data System is divided into various Workflow Paths, each of which falls under the "jurisdiction" of a particular entity. Each such entity maintains control over and responsibility for its jurisdiction in several ways. Throughout this TAM, any reference to a "jurisdictional entity" shall mean the entity in control of and responsible for the Workflow Path discussed.

The jurisdictional entity is given entitlement rights through which it makes decisions regarding the specific individuals that may access each Workflow Path, and is able to impose limitations on access provided to such individuals. This includes both employees of the jurisdictional entity and of its contractors. Jurisdictions are, for the most part, aligned with county boundaries, with a few exceptions.

Each Area Agency on Aging is the jurisdictional entity for all of its Workflow Paths within the Statewide Client Data System, including the NY Connects Workflow Path. This is the case regardless of the degree to which an AAA utilizes subcontractors in performing program activities, as the AAA retains responsibility for and decision-making authority over the Workflow Path. The Regional ILC is the jurisdictional entity for the NY Connects—ILC Workflow Paths of each county within its region. This is the case even if the Regional ILC has subcontracted with another ILC to be responsible for NY Connects operations and a physical presence in a specific county within its region.

The Statewide Client Data System is an application that is accessed through the Health Commerce System (HCS). This secure web portal is a gateway to a number of applications containing Personal Identifying Information (PII) and Protected Health Information (PHI) and thus, designed to meet the highest levels of security. The authorization of an HCS account allows for the creation of credentials (username and password) but does not grant access into the Statewide Client Data System. Through HCS, an individual may only be granted a single set of credentials. Each jurisdictional entity within the Client Data System has entitlement rights which allows role assignments of the credentialed individuals to be given. After permissions are granted, the individual will be able to access the necessary Workflow Paths for which he or she has been granted a role within the Statewide Client Data System.

<u>Process</u>

The Client Data System is designed, as a default rule, to allow a user access to a single jurisdiction only. In instances where an individual already has access to a Workflow Path of one jurisdiction, another jurisdiction will be unable to add this user or assign a user role without first submitting a Help Desk Ticket to PeerPlace[1]. Before submitting a Help Desk ticket to PeerPlace, the jurisdictional entity seeking to add such a user must first notify and coordinate with the jurisdictional entity whose Workflow Path this individual already has access. It will be the decision of each jurisdictional entity whether the individual will be granted permissions to its jurisdiction or if existing permissions will be revoked, as is the case with all users of the Statewide Client Data System. The process for notification and approval is as follows:

1. If a jurisdictional entity is seeking to grant permissions that, if processed, would result in an individual having access to Workflow Paths of two or more jurisdictions, the AAA Director or ILC regional lead must first notify the AAA Director or ILC regional lead in the other jurisdictional entity involved of this fact.

2. The jurisdictional entities involved should each determine if they are agreeable to circumstances in which a user of their Workflow Path will also have access to the Workflow Path of another jurisdictional entity. This may involve addressing any considerations (see guidance below) and/or entering into agreements to coordinate.

3. If both jurisdictional entities involved agree to these circumstances, each AAA Director or ILC regional lead must contact NYSOFA via email at NYSOFADataSecurity@aging.ny.gov to confirm their agreement.

4. The jurisdictional entity seeking to add this user to its Workflow Path will then submit a Help Desk ticket to PeerPlace to have this user added. If NYSOFA has received confirmation from each jurisdictional entity as described above, NYSOFA will notify PeerPlace that access may be granted.

Example 1:

Individual is a new employee of Contracted Service Provider. Contracted Service Provider is under contract with both Jurisdiction A and Jurisdiction B. Individual's job duties will include activities under each contract at various times. Both Jurisdiction A and Jurisdiction B intend to grant permissions for Individual to access the necessary Workflow Paths in their respective jurisdictions within the Statewide Client Data System. Before doing so, the two jurisdictional entities must each decide if they wish Individual to have access to their Workflow Paths under these circumstances. Either jurisdictional entity may grant permissions first using the standard process. Assume Jurisdiction A does so. Jurisdiction A and Jurisdiction B then each email NYSOFA confirming that they wish Individual to access their respective Workflow Paths under these circumstances. Jurisdiction B must then submit a Help Desk ticket to

[1] To submit a Help Desk Ticket to PeerPlace, please follow the same protocol as for any other Help Desk Ticket.

PeerPlace seeking access by Individual into its Workflow Path. When requested by PeerPlace, NYSOFA will verify that this is acceptable.

Example 2:

Individual is a part-time employee of Jurisdiction A, and currently has access to certain Workflow Paths in the Statewide Client Data System. Individual then accepts part-time employment with Jurisdiction B. Individual will be employed by both entities concurrently but will work for each on different days. Jurisdiction B attempts to grant permissions to Individual to have access to specified Workflow Paths within its jurisdiction in the Statewide Client Data System, but is unable to and learns that Individual already has access to Workflow Paths within Jurisdiction A. Jurisdiction B must notify Jurisdiction A of its intent to grant access. If acceptable to each jurisdictional entity, Jurisdiction A and Jurisdiction B will discuss any considerations, and will each email NYSOFA confirming that they wish Individual to access their respective Workflow Paths under these circumstances. Jurisdiction B must then submit a Help Desk ticket to PeerPlace seeking access by Individual into its Workflow Path. When requested by PeerPlace, NYSOFA will verify that this is acceptable.

<u>Considerations</u>

If an individual is allowed access to specified Workflow Paths of multiple jurisdictions, only one workflow path is viewed at any time, and the information contained in each remains separated. However, opening other Workflow Paths the user has access to is achieved by selecting a drop-down, and does not require the user to log out and re-enter his or her credentials. This creates the possibility of client data being inadvertently entered into the incorrect Workflow Path.

In making decisions of whether to grant permissions to an individual user who will also have access to Workflow Paths within other jurisdictions, AAAs and ILCs should consider any implications that are unique to these circumstances and any risks that may be involved. NYSOFA encourages organizations to consult with their legal counsel in making these decisions and in taking steps to address any risks or concerns. This may involve agreements between the jurisdictional entities that would be providing access into their respective Workflow Paths by the same individual, and agreements with the individual that would be provided such access. Items that should be considered include, but are not limited to:

- *Liability:* Organizations should consider which may be responsible should a breach of personal information occur involving the user with access to two or more jurisdictions.
- *Responding to a Breach:* This includes any responsibilities regarding notification of individuals or government entities should a breach occur.

- *Delineating Roles:* Organizations should consider steps that can be taken to clearly delineate when an individual is performing tasks on behalf of either jurisdiction, and how this delineation may be maintained in accessing and using the Statewide Client Data System.
- *Inadvertent Entry:* Organizations should consider how they will identify and respond to instances of inadvertent entry of data into the incorrect workflow path, and how they might mitigate the risk of this occurring.

PROGRAMS AFFECTED:		☒ Title III-B	☒ Title III-C-1	☒ Title III-C-2
☒ Title III-D	☒ Title III-E	☒ CSE	☒ SNAP	☒ Energy
☒ EISEP	☒ NSIP	☒ Title V	☒ HIICAP	☐ LTCOP
☒ NY Connects: Choices for Long Term Care	☒ Other: All workflow paths for Aging Network Services in the Statewide Client Data System			

CONTACT PERSON: Any questions or concerns should be directed to the entity's assigned Aging Services Representative or NY Connects Coordinator.