Procedures for User Access Report
Updated 1/25/22 by CCEH

A new User Access Report has been created for HMIS Data Coordinators (HDCs) to use to review their users HMIS access. The purpose of the report is to assure that users are only reviewing client records within the scope of their access permissions.

Instructions for running the report:
- Step-by-step instructions to run the report are in the User Report Usage Instructions and available at: **https://cceh.org/data-quality/**

Documentation of Report Review by HDC:
- HDCs will self-monitor their run and review of the report

Review Process –
- Run the report monthly as best practice
  - Quarterly is minimum standard
- Review your users' access activity by Organization(s)
- Looking for unexpected access patterns
  - **Examples:**
    - Spike in values from one month or quarter to the next
    - High volume of records accessed with no enrollments in the Organization
    - Unexpectedly high volume of records accessed by a user considering their role
    - Unexpectedly high volume of records accessed within a specific date range
    - Unexpectedly high volume of accesses for specific client record(s)

- The HDC may want to craft an internal document that fits their agency's protocols so that their users will be aware of the process

Unexpected Usage Escalation Process:

Level 1 – **HDC notices unexpected usage patterns**
- HDCs will review usage with immediate supervisor/manager
  - Human Resources will be notified if appropriate for your agency's protocols

Level 2 – **HDC and Manager need more information**
- HDC and their manager will submit a ticket to Nutmeg to further review unexpected usage
- Nutmeg will confirm that the data is accurate and assist HDC and manager in assessing the usage

Level 3 – **HDC, Manager, and Nutmeg still have concerns about the usage**
- CCEH will be contacted by the HDC, and a meeting will be set up for CCEH, Nutmeg, HDC, and the Manager
- Will determine if inappropriate usage has been identified

- **If inappropriate usage is identified**
  - Nutmeg will initiate process to deactivate the user
    - Deactivation will not be initiated without review by HDC and manager
  - Manager will determine corrective or disciplinary action needed
  - Manager will document outcome and provide a summary to CCEH to bring to the HMIS Steering Committee

Level 4 – **CCEH will notify HMIS Steering Committee**

- If inappropriate usage is identified CCEH will notify the HMIS Steering Committee of the situation and outcome
  - X number users deactivated
  - Reasons for deactivation
  - Additional steps taken
  - Notification to the party(ies) whose information was breached will follow the National Conference of State Legislators (NCSL) guidelines for the state of Connecticut
  - https://www.ncsl.org/research/telecommunications-and-information-technology/security-breach-notification-laws.aspx