

Emergency Access Procedures

1. Introduction

- a. Clark County has adopted these Emergency Access Procedures to comply with the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), the Department of Health and Human Services (“DHHS”) security and privacy regulations, and the Joint Commissions on Accreditation of Healthcare Organizations (“JCAHO”) accreditation standards, as well as our duty to protect the confidentiality and integrity of confidential medical information as required by law, professional ethics, and accreditation requirements.
- b. All personnel of Clark County must comply with this policy. Familiarity with the personnel security policy and demonstrated competence in the requirements of the policy are an important part of every employee’s responsibilities.

2. Policy

- a. Clark County may invoke these Emergency Access Procedures when an incident occurs that has disabled or will disable, partially or completely, the central computing facilities of Clark County, the health information system, and/or the communications network or when an incident has substantially impaired the use of health information computers and networks.
- b. When such incidents occur, Clark County will invoke this plan when the incident requires Clark County personnel or other personnel, such as maintenance technicians, to have access to the system or its data that has not previously been granted under Clark County’s Access Authorization and Access Establishment Policies. These Emergency Access Procedures supplement the Clark County’s overall Disaster Plan and Emergency Operations Plan.
- c. Clark County’s executive as well as the Emergency Management department will determine when this plan will be activated and terminated.
- d. Once this plan is activated, the following steps may take place:
 - 1) Physicians and other health care professionals may access patient charts for which they have no assigned patient responsibility in emergencies.
 1. The department heads will determine which physicians and other health care professionals need access or need different access during emergencies.
 - 2) Department heads will train and determine which individuals require immediate access in an emergency in cases which the following conditions occur:
 1. There is no time to properly screen or train the individual as required by Clark County’s Access Authorization and Access Establishment Policies.
 2. The individual needs different access from that granted under the Access Authorization and Access Establishment Policies, and following the Access Modification Policy is impracticable.