

Privacy Contacts' Attestations of Privacy Auditors

Updated February 2018

Learning Objectives

This session will review:

- The process whereby Privacy Contacts (PCs) are required to attest that the Privacy Auditors for their organization still holds that role
- How to use the Access Governance System (AGS) to perform attestations
- The escalation points if attestations are not completed in a timely manner



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What are Attestations?

“Attestation” refers to the practice of periodically checking and certifying that only the individuals who need certain access privileges to ClinicalConnect and/or AGS have those access privileges. This process is used so the Privacy Contact can confirm **Privacy Auditor(s)** have appropriate access to perform audit functions within their organization.



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Attestation Cycle

- Privacy Officers will receive notifications to perform attestations by email every **May 1** and **November 1**.
- A sample of the email POs will receive appears below:

Subject: Action Required: You Must Perform Semi-Annual ClinicalConnect Attestations
Dear Sue Privacy Contact

Please be advised you must log into the ClinicalConnect [Access Governance System](#) (AGS) to perform attestations. You will find your attestation requests under “My Actions”, then “Pending Attestations”.

The attestation process is invoked starting every May 1 and November 1 in accordance with the ClinicalConnect Participation Agreement and you are required to complete these attestations for AGS and/or ClinicalConnect users in your organization to verify they are still authorized to use one or more of the systems.

Please complete these attestations as soon as possible.

Regards,
ClinicalConnect Administration Team at Hamilton Health Sciences



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Completing Attestations

Log into AGS, select “My Actions” from the menu, then select “Pending Attestations”. Approve or Deny the account and “Save Decisions”.

1

2

2

You may add a reason for your attestation decision **Optional**

ACCESS GOVERNANCE SYSTEM

Start > Pending Attestations :

My Profile

My Activity History

My Actions **33**

- Pending Requests **5**
- Pending Attestations 4**
- User Enablement **24**
- Reactivate disabled Users

Submit request

More options

Pending Attestations

The following attestation cases require your decision.

| Display name ▼ | Information | Created ▼ | Partner Organization | Email ▼ | ▼ | Decision | Actions |
|-----------------|-------------|-----------|----------------------|--------------------|---|--|------------------------|
| Training, Fred | <i>i</i> | 4/5/2016 | Training | fredtra@train.ca | 0 | <input checked="" type="checkbox"/> Approve <input type="checkbox"/> Deny | more ▼ |
| Training, Janic | <i>i</i> | 4/5/2016 | Training | jtraining@train.ca | 0 | <input type="checkbox"/> Approve <input checked="" type="checkbox"/> Deny | more ▼ |
| Training, Beth | <i>i</i> | 4/5/2016 | Training | beth.training@tra | 0 | <input type="checkbox"/> Approve <input type="checkbox"/> Deny | more ▼ |
| Training, Bob | <i>i</i> | 4/5/2016 | Training | btraining@train.ca | 0 | <input type="checkbox"/> Approve <input type="checkbox"/> Deny | more ▼ |
| | | | | | | <input type="checkbox"/> Approve all <input type="checkbox"/> Deny all | |

Export this view: [PDF](#) | [CSV](#)

Please enter a reason for your decision.

Reason for attestation:

2 [Save Decisions](#) [Back](#)

Refer to the “Completing Pending Attestations in AGS” eLearning video available at <http://info.clinicalconnect.ca/CC/access-governance-system/>

Attestation History

- The Attestation History shows approvals and denials within the specified date range.
- Log into AGS, select “My Activity History” from the menu, then select “Attestation History”. Select the date range.

You may change the date range, then “Search” to display the attestations.

Optional

ACCESS GOVERNANCE SYSTEM

Start > Attestation History

My Profile

My Activity History

- Request History
- Approval History
- Attestation History**

My Actions 31

Submit request

More options

Attestation History

This page shows the history of your attestation decisions. For a more detailed search please use the button "Advanced Search".

Attestation date between: and

[Advanced search](#) [Search](#)

Name Change Request (13)

| Information | Created | Original Name | New Name | Email | CPSO |
|-------------|-----------|---------------------|-------------------|---------------------|-------|
| | 2/18/2016 | Betty1, Betty Dr. | Boop, Betty Dr. | 4562@123.ca | 78987 |
| | 2/18/2016 | Betty1, Betty Dr. | Boop, Betty Dr. | 4562@123.ca | 78987 |
| | 2/18/2016 | Ant, Adam | Antler, Adam | adam@anthill.com | |
| | 2/29/2016 | Boyle, Sunshine Dr. | Boyle, Cloudy Dr. | s.boyle@gmail.com | 05645 |
| | 2/29/2016 | Brown, George | Gray, George | mouse@guelpfhft.com | |

Required Attestations

- Privacy Auditors who have been appointed in the 3 months leading up to the May 1 or November 1 attestation cycle do not require an attestation until the next attestation cycle; this is to avoid the attestation of recently-created accounts.

Schedule of Attestation Notifications

- Privacy Contact will receive a **reminder email** if the attestations are **not complete within 2 weeks** of receiving the initial notification.
- If attestations are **not complete within 4 weeks** of receiving the initial notification, an escalation email is sent to the organization's LRA(s).

If Attestations Are Not Complete

- If attestations are **not complete within 6 weeks**, Privacy Contact will receive final notification that all Privacy Auditor appointments, including access to ClinicalConnect to perform audits, will be automatically revoked in 2 weeks
 - If an organization only has one Auditor and that attestation is denied or not completed, the appointment is automatically revoked and Audit responsibilities fall to the Privacy Contact
- **After 8 weeks**, all unattested accounts will be disabled

Questions & Answers



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