## **APPENDIX A**

Arizona Department of Health Services
Division of Public Health Services
Immunization Services Procedures Manual

Effective Date: 04/01/15 Last Revision Date: 04/01/15

**PROCEDURE** 

ARIZONA STATE IMMUNIZATION INFORMATION SYSTEM (ASIIS) CONFIDENTIALITY

A. PURPOSE:

ASIIS shall be appropriately secured and responsibility for security communicated to all users. User access is limited to that needed for performing medically necessary or legally mandated tasks or system maintenance as appropriate to job function or contract relationship.

B. SCOPE:

All users and account holders of Arizona State Immunization Information System

C. PROCEDURE:

- 1. WHY: Access to ASIIS shall be restricted to persons and organizations with a documented need to check a client's immunization status according to A.R.S. § 36-135 and Arizona Administrative Code R9-6-707, and R9-6-708. Client-specific information is only available to authorized users and the Arizona Department of Health Services.
- 2. YOUR RESPONSIBILITIES: If you are a user of ASIIS, then you have access to individually identifiable information. You must treat all information in ASIIS as confidential. You may not release or take actions not immediately related to immunization or patient care based on information obtained from ASIIS. You may look up information only on patients and students for whom you or your employer have patient care responsibility, legal guardian responsibility, or student or daycare enrollment requirements to verify immunization status or WIC requirement to verify immunization status. If you have the appropriate account, you may enter or update demographic, patient care and immunization information, such as name changes, address changes, and shot data. You may not release or share information from ASIIS, except for the purposes specified by the law and administrative rule above. You may not allow others to use your ASIIS account, and you are responsible for all inappropriate use of your account.
- 3. PENALTIES: The User Agreement for each Provider or School or State agency requires the responsible person to hold every employee responsible for handling patient/student information from ASIIS confidentially and to apply your employer's usual penalties for inappropriate use and disclosure, which may include termination of employment. In particular, in physician offices, you should handle ASIIS information according to HIPAA rules. In schools, you should handle ASIIS information according to FERPA rules. In addition, State law makes it a misdemeanor to inappropriately use or disclose information from ASIIS.
- 4. CHANGES: Parents or guardians should be allowed to review a child's records as recorded in ASIIS. If they require a copy of the

immunization record, "Immunization Record Request" should be used from our web site

http://www.azdhs.gov/phs/immunization/documents/asiis-request-form.pdf or call the ASIIS Help Line 602-364-3899 or 877-491-5741 to have a copy faxed or mailed to you. Fax the completed form to 602-364-3285 or mail to:

Arizona Department of Health Services Immunization Program Office/ ASIIS 150 N. 18<sup>th</sup> Ave., Suite 120 Phoenix, AZ 85007-3233

Please note that the form requires that you specify the documentation provided to you by the parent or guardian to support the correction. Rarely, such requests may be denied at the discretion of ASIIS; however, a letter explaining the denial will be sent to the requesting party. Parents or guardians may also request exclusion of their child's information from ASIIS. Please use the "ASIIS Request Withdrawal" form, obtained by calling the ASIIS Help Line.

- 5. OTHER REQUESTS: All requests for individually identifiable information in ASIIS from anyone for <u>purposes other than</u> <u>patient care</u>, including address or telephone number requests from a non-custodial parent, your own marketing department, and law enforcement, must be referred to ASIIS Program Manager (telephone 602-364-3619) who will refer the request to the Arizona State Attorney General's Office. <u>This use of ASIIS information is generally prohibited</u> and only the Attorney General's Office may permit any exceptions.
- 6. ALLOWED REQUESTS: ARS § 36-135 and Arizona Administrative Code R9-6-706 through 708 permit use of ASIIS information on patients/student with whom you have a care or student relationship if you are a healthcare provider, school official or delegate, WIC employee (to verify up-to-date immunizations), custodial parent, CPS employee with guardianship relationship to the child, other guardian, childcare administrator or delegate to determine the immunization status of a child in the child care, or state or local public health for purposes of the control, investigation, analysis, or follow-up of disease. You may send immunization information to other authorized recipients but this report must not include address, phone number, social security number or other confidential information. When sending information to other authorized users, using ASIIS, print the "Patient Vaccination Record without Confidential Information". This report contains only name, date of birth, and immunizations. You may use patient address and phone number information for immunization reminder/recall activity (see TAPI's website for free postcards and see ASIIS web for label printing capability), but not for general marketing.

## E. DEFINITIONS:

- 1. ASIIS: Arizona State Immunization Information System
- 2. PHI: protected healthcare information

- 3. III: Individually identifiable information
- 4. HIPAA: Health Information Portability and Accountability Act
- 5. FERPA: Family Educational Rights and Privacy Act http://www.ed.gov/print/policy/gen/guid/fpco/ferpa/index.html
- 6. CPS: Child Protective Services
- 7. WIC: Supplemental Nutrition Program for Women Infants and Children
- 8. AHCCCS: Arizona Health Care Cost Containment System
- 9. ARS: Arizona Revised Statutes
- 10. TAPI: The Arizona Partnership for Immunization https://www.whyimmunize.org

## C. REFERENCES:

- 1. A.R.S. § 36-135 http://www.azleg.state.az.us/ars/36/00135.htm
- 2. Arizona Administrative Code R9-6-707 and R9-6-708 http://apps.azsos.gov/public\_services/Title\_09/9-06.pdf
- 3. National Immunization Program functional standards http://www.cdc.gov/vaccines/programs/iis/func-stds.html