



TO: ADHC program director, RN, RN Assessor, UAS-45 RN Supervisor, HCS Coordinator, Administrator
FROM: Anne Hill, executive director
DATE: April 24, 2018
SUBJECT: **New UAS-NY Policies**

The Department of Health (DOH) recently issued three new policies for UAS-NY users. These policies apply to ADHC providers and may require you to change your policies and procedures for contacting the UAS-NY help desk, conducting UAS-NY assessments at admission and 6-month reassessment. Every ADHC program is expected to read these documents thoroughly and conduct assessments according to the new policies. The policies are attached as an addendum to this memo and can also be found on the ADHCC website, www.adhcc.org.

UAS-NY.18.2 Summary

As an authorized user of the Health Commerce System (HCS) and UAS-NY, you must protect Personal Identifying Information (PII) and Protected Health Information (PHI) from unauthorized access, use, disclosure, modification or destruction. Individual person records are maintained in the UAS-NY database, which is owned and operated by the New York State DOH. This record data is accessible to any organization that has attested to having a legitimate business need to access. PII includes the following identifiers: first and last name, CIN, social security number, date of birth, and address. PII is editable for the purpose of correction by all organizations who are authorized to access the person record.

Prior to making an edit to PII in the UAS-NY, the UAS-NY user must verify with a system of record/source of truth that the edit being made corrects current data. If you need to change PII, you must document the “source of truth” and the date of verification in the Comment Box in the Identification Information Node. “Source of truth” includes eMedNY, ePACES, Medicaid Data Warehouse, Welfare Management System, CHOICES and government issued photo identification documents.

Any ADHC program that requires assistance regarding a specific UAS-NY case file must either call the UAS-NY help desk to share PII or must send an encrypted/password protected email. DO NOT send PII/PHI in a non-encrypted email. The UAS-NY help desk phone number is 518-408-1021.

Failing to take the appropriate security precautions or inappropriately making changes to PII data in the UAS-NY record will result in a suspension of the user’s HCS account.

UAS-NY.18.3 Summary

DOH expects all assessments be signed and finalized at the time the assessment is conducted. The RN Assessor should conduct, sign, and finalize the Assessment Outcomes on the same day or time.

DOH expects if secondary or additional information is required to complete the assessment, it must be entered and finalized within a day or two of the date the assessment was conducted.

Beginning May 14, 2018, all assessments will automatically lock after five consecutive calendar days from the date the assessment was created.

ADHCC programs must review current assessment processes and make changes if necessary to ensure:

- 1. Assessments are conducted, signed and Assessment Outcomes finalized on the same day.**
- 2. If additional information is needed to complete the assessment, this data must be entered within a day or two of the date the assessment was conducted.**

Assessments will automatically lock after five consecutive calendar days from the date the assessment was created.

A UAS-45 RN Supervisor may call the help desk (518-408-1021) to request an assessment be unlocked for the following reasons:

- Correcting errors or omissions that affect the individual's plan of care.
- Deleting an assessment that was added to, conducted, and finalized in the wrong record and an assessment that was conducted by an incorrect plan/program.
- Deleting an unfinalized assessment that was added to the wrong record or added by an incorrect plan/program.

An assessment **will not** be unlocked if the assessment is initiated but not complete within five calendar days OR, the RN assessor completes the assessment on the day that is initiated but does not sign and finalized the assessment within five calendar days.

ADHC programs should be reminded that Part 425 regulations require the UAS-NY to be conducted, signed and finalized prior to or on the date of admission. A registrant may not be admitted and billed for unless the assessment is fully complete.

In addition, the reassessment must be completed at least once every six months for every registrant.

UAS-NY.18.4 Summary

If a user performs any action in the UAS-NY that could be construed as fraudulent, a security breach, or a violation of HIPAA or HITECH, the UAS-NY user, the organization that assigned the UAS-NY role and the organization under which the HCS user account was created, may be held accountable for a security violation.


The actions below will result in immediate impact to the user's ability to access and work in the UAS-NY, including, at a minimum, 10-day suspension of the user's account:

- Assessments conducted in the wrong person record
- Assessments conducted, signed and finalized under the incorrect organization
- Attesting to a person record without a legitimate business need
- Signing and finalizing another user's assessment/more than one user completing one assessment
- Incorrectly entering PII in more than one assessment field
- Sending PII in unencrypted/unsecured email

- Assessments must be completed in-person/face-to-face. Telephonic, Skype, or FaceTime assessments are not allowed under any circumstances.

If you performed one of the actions above, please notify your supervisor and contact the UAS help desk (518-408-1021); email notifications will not be accepted. Additional information on each violation is found in the policy.

If you have any comments or concerns about the contents of this memo, please contact Anne Hill at ahill@leadingageny.org or call 518-867-8836.

 Department of Health		Division of Long Term Care	
Manual Section: Policies and Procedures – Uniform Assessment System for New York (UAS-NY)		Policy Name: Personally Identifying Information (PII) Policy	
Policy Number: UAS-NY.18.2		Issue Date: 04/13/18	Page: 1 of 2
Prior Policy Number(s)	<input type="checkbox"/>		
Applicable to: All UAS-NY Assessment Users		(Check One)	
<input type="checkbox"/>	Office of Health Insurance Programs	Area	<input type="checkbox"/> New (Date policy was created)
<input type="checkbox"/>	Division of Long Term Care: Uniform Assessment System for New York (UAS-NY)	Department	<input type="checkbox"/> Reviewed (No changes to policy)
<input type="checkbox"/>			<input type="checkbox"/> Revised (Content changes made to policy)
<input type="checkbox"/>		Staff	<input type="checkbox"/> Repealed (Policy is no longer active)
<input type="checkbox"/>	All UAS-NY Assessment Users	Lines of Business and Applicable State(s)	Approval Date: 04/10/18 Approved By: Erin Kate Calicchia Deputy Director, Division of Long-term Care (interim)

Purpose

The purpose of this policy is to ensure that standard processes associated with conducting assessments in the Uniform Assessment System for New York (UAS-NY) are followed. New York State has policies, standards, and guidelines that govern the use of its information and resources. You are expected to read this document and conduct your assessment activities, accordingly.

Background

The UAS-NY web-based secure software application, owned and operated by the NYS Department of Health, contains a suite of electronic assessment instruments for individuals being served in a number of New York State programs under the oversight of various NYS Agencies.

Summary of Applicable Procedures or Guidelines:

Protecting personally identifying information (PII) and protected health information (PHI) data available in various DOH systems is a major priority for the Department and its stakeholders. PII refers to information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a

specific individual. PHI refers to most individually identifiable health information held or transmitted by a covered entity or its business associate, in any form or medium, whether electronic, on paper, or oral.


Pursuant to New York State laws governing PII and PHI, the identity of each user accessing the Uniform Assessment System for New York (UAS-NY) must be verified and validated to Trust Level 3 assurance and each user must enroll in Multi-Factor Authentication (MFA). The Health Commerce System (HCS) includes an easy-to-use mechanism to establish this trust level for an organization's users and their HCS accounts. As an authorized user of the HCS and UAS-NY, you have an obligation to help preserve and protect PII/PHI from unauthorized access, use, disclosure, modification, or destruction. Security violations committed by an individual are the responsibility of the organization which created the HCS user account and the organization that assigned the UAS-NY roles.

Individual person records are maintained in the UAS-NY database, which is owned and operated by the New York State DOH. This record data is accessible to any organization that has attested to having a legitimate business need to access and confirmed the consent of authorization of the individual. PII includes the following unique identifiers that comprise demographic data: first and last name, CIN, social security number, date of birth, TABS ID (OPWDD only), and address information. PII is editable for the purpose of correction by all organizations who are authorized to access the person record.

Prior to making an edit to PII in a UAS-NY record, the UAS-NY user must verify with a system of record/source of truth that the edit being made **corrects** current data. If verification warrants a data correction, the system of record/source of truth used to verify the PII and date of verification must be documented in the Comment Box in the Identification Information Node. Internal record keeping systems are not considered systems of record/sources of truth. The only valid systems of record/sources of truth are Electronic Medicaid of New York (eMedNY), Electronic Provider Assisted Claim Entry System (ePACES), Medicaid Data Warehouse (MDW), Welfare Management System (WMS), CHOICES (OPWDD only), and government issued photo identification documents.

Additionally, any UAS-NY user that requires assistance regarding a specific UAS-NY case file record must either call the UAS-NY Support Desk to share PII or if requesting assistance via email, PII must be sent in an encrypted/password protected communication. Users are not to send PII in an unencrypted/non-password protected email. The UAS-NY Project Team will not accept or respond to emails that contain PII that are sent unencrypted/unsecured. Alternatively, the HCS provides a Secure File Transfer utility that will easily and securely transfer files and folders between users. HCS users can complete a onetime registration in the HCS to utilize the Secure File Transfer utility.

Failing to take the appropriate security precautions and incorrectly or inappropriately making changes to PII data elements in a UAS-NY record will result in a suspension of the user's HCS account.

 Department of Health		Division of Long Term Care	
Manual Section: Policies and Procedures - Uniform Assessment System for New York (UAS-NY)		Policy Name: Auto-Lock and Administrative Unlock Policy for the Uniform Assessment System for New York (UAS-NY): Community Assessment, Pediatric Assessment 0-3, and Pediatric Assessment 4-17	
Policy Number: UAS-NY.18.3		Issue Date: 04/11/18	Page: 1 of 2
Prior Policy Number(s) <input type="checkbox"/>			
Applicable to: All Community Assessment, Pediatric Assessment 0-3, and Pediatric Assessment 4-17 Users		(Check One)	
<input type="checkbox"/>	Office of Health Insurance Programs	Area	New (Date policy was created) <input checked="" type="checkbox"/>
<input type="checkbox"/>	Division of Long Term Care: Uniform Assessment System for New York (UAS-NY)	Department	Reviewed (No changes to policy) <input type="checkbox"/> Revised (Content changes made to policy) <input type="checkbox"/>
<input type="checkbox"/>		Staff	Repealed (Policy is no longer active) <input type="checkbox"/>
<input type="checkbox"/>	All Community Assessment, Pediatric Assessment 0-3, and Pediatric Assessment 4-17 Users	Lines of Business and Applicable State(s)	Approval Date: 04/10/18 Approved By: Erin Kate Calicchia Deputy Director, Division of Long-term Care (interim)

Purpose

The purpose of this policy is to ensure that standard processes are followed for all assessments conducted in the Uniform Assessment System for New York (UAS-NY). New York State has policies, standards, and guidelines that govern the use of its information and resources. You are expected to read this document and conduct your assessment activities, accordingly.

Background

The UAS-NY web-based secure software application, owned and operated by the NYS Department of Health, contains a suite of electronic assessment instruments for individuals being served in a number of New York State programs under the oversight of various NYS Agencies.

Summary of Applicable Procedures or Guidelines:

It is the DOH's expectation that all Community Assessments and Pediatric Assessments be signed and finalized at the time the assessment is conducted. The RN Assessor should then conduct, sign, and finalize the Assessment Outcomes. If collateral information is required to

complete the assessment, it must be entered and finalized within a day or two of the date the assessment was conducted.

Beginning with the release of version 1.4 of the UAS-NY software (May 14, 2018), all Community Assessments and Pediatric Assessments will automatically lock after five consecutive calendar days from the date the assessment was created.


A UAS-45 RN Supervisor may call the UAS-NY Support Desk (518-408-1021) during regular business hours to request that an assessment be unlocked for the following reasons:

- **Correcting Errors or Omissions that Affect the Individual's Plan of Care**
 - The RN Assessor will have 24 hours to make applicable corrections before the assessment is automatically locked again. All requests to unlock assessments must be made within 10 calendar days of the date the assessment was locked. An assessment can only be unlocked once. Email requests will not be considered.
- **Deleting an Assessment that was Added to, Conducted, and Finalized in the Wrong Individual's Record, or an Assessment that was Conducted by or on Behalf of an Incorrect Program or Plan**
 - The UAS-NY Support Desk will work with the RN Supervisor to unlock and unfinalize the assessment and prepare for deletion. The HCS account of the RN Assessor who conducted the assessment will be suspended and a new assessment must be completed. Email requests will not be considered.
- **Deleting an Unfinalized Assessment that was Added to the Wrong Individual's Record or Added by or on Behalf of an Incorrect Program or Plan**
 - The UAS-NY Support Desk will unlock the unfinalized assessment so that the RN Supervisor can delete it. Email requests will not be considered.

Please note, assessments will not be unlocked for the following reasons:

- The assessment is initiated, but information has not been added within five calendar days.
- The assessment is initiated and partial information is added, but the assessment is not completed, signed, and finalized within five calendar days.
- The RN Assessor completes the assessment on the day that it is initiated, but does not sign and finalize the assessment within five calendar days.

Assessment administrative unlock is conducted at the discretion of the NYS Department of Health. This UAS-NY policy supersedes all previous policies related to the signing and unfinalizing of assessments.

 Department of Health		Division of Long Term Care	
Manual Section: Policies and Procedures – Uniform Assessment System for New York (UAS-NY)		Policy Name: Organization and Individual Responsibilities Associated with Using the UAS-NY	
Policy Number: UAS-NY.18.4		Issue Date: 04/13/18	Page: 1 of 3
Prior Policy Number(s)		<input type="checkbox"/>	
Applicable to: All UAS-NY Assessment Users		(Check One)	
<input type="checkbox"/>	Office of Health Insurance Programs	Area	New (Date policy was created) <input checked="" type="checkbox"/>
<input type="checkbox"/>	Division of Long Term Care: Uniform Assessment System for New York (UAS-NY)	Department	Reviewed (No changes to policy) <input type="checkbox"/>
<input type="checkbox"/>			Revised (Content changes made to policy) <input type="checkbox"/>
<input type="checkbox"/>		Staff	Repealed (Policy is no longer active) <input type="checkbox"/>
<input type="checkbox"/>	All UAS-NY Assessment Users	Lines of Business and Applicable State(s)	Approval Date: 04/10/18 Approved By: Erin Kate Calicchia Deputy Director, Division of Long-term Care (interim)

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Summary of Applicable Procedures or Guidelines:

Protecting personally identifying information (PII) and protected health information (PHI) data available in various DOH systems is a major priority for the Department and its stakeholders. PII refers to information that can be used to distinguish or trace an individual's identity, either alone

or when combined with other personal or identifying information that is linked or linkable to a specific individual. PHI refers to most individually identifiable health information held or transmitted by a covered entity or its business associate, in any form or medium, whether electronic, on paper, or oral.

If a user performs any action in the UAS-NY that could be construed as fraudulent, a security breach, or a violation of HIPAA or HITECH, the UAS-NY user, the organization that assigned the UAS-NY role, and the organization under which the Health Commerce System (HCS) user account was created, may be held accountable for a security violation.

The actions detailed below have been identified as actions that, if taken, will result in immediate impact to the user's ability to access and work in the UAS-NY, including, at minimum, a ten-day suspension of the user's account. Suspended accounts will be reinstated upon the receipt and acceptance of a Corrective Action Plan submitted to the UAS-NY Project Team by the organization that assigned the UAS-NY role and/or the organization under which the HCS user account was created, as determined by the UAS-NY Project Team.

- **Assessments Conducted in the Wrong Person Record**
- **Assessments Conducted, Signed, and Finalized Under the Incorrect Organization**
 - Some users may have multiple UAS-NY roles provisioned by multiple organizations. Each user must ensure that he/she is logged in under the correct organization before adding an individual record to the organization case list and conducting assessments.
- **Attesting to a Person Record Without a Legitimate Business Need**
 - Legitimate business need includes:
 - Assessing individuals enrolled in your program or plan
 - Assessing individuals for a program or plan with whom the organization has a vendor contract
 - Assessing individuals that your organization is actively working with to enroll in your program or plan
 - Managing the plan of care for individuals enrolled in your program or plan
 - Managing the plan of care for individuals enrolled in a state administered program or plan with whom the organization is affiliated
 - Conducting a conflict free evaluation
- **Signing and Finalizing Another User's Assessment/More Than One User Completing One Assessment**
 - At no time may the user signed in to the UAS-NY perform the work of another user or allow another user access to the signed-on account.
- **Incorrectly Entering PII in More Than One Assessment Field**
 - Please refer to the PII Policy issued April 13, 2018 for further guidelines related to entering PII in UAS-NY Assessments.
- **Sending PII in Unencrypted/Unsecured email**
 - Any UAS-NY user that requires assistance regarding a specific UAS-NY case file record must either call the UAS-NY Support Desk to share PII or if requesting assistance via email, PII must be sent in an encrypted/password protected communication. The UAS-NY Project Team will not accept or respond to emails that contain PII that are sent unencrypted/unsecured (referred to in UAS-NY.18.2 policy). Alternatively, the HCS provides a Secure File Transfer utility that will easily and securely transfer files and folders between users. HCS users can

complete a onetime registration in the HCS to utilize the Secure File Transfer utility.

- **Long-Term Care Assessments Must Be Completed In-Person/Face-to-Face**
 - Telephonic, Skype, or Face Time Assessments are not allowed under any circumstances.

Action will be taken due to inappropriate use as defined by the NYS Department of Health and at the discretion of the Department. If you have performed one of the actions above, please notify your supervisor and then contact the UAS-NY Support Desk at (518) 408-1021; email notifications will not be accepted. The UAS-NY Support Desk will work with the user and his/her supervisor to resolve the reported issue(s).