From: Aging, PSA Help <psahelp@aging.sc.gov>
To: Kester, Tony <kester@aging.sc.gov>
Pondy, Kevin <pondyk@aging.sc.gov>
Theriot, Susan <stheriot@aging.sc.gov>
Beard, Rene <rbeard@aging.sc.gov>
Dickinson, Gerry <gdickinson@aging.sc.gov>
Date: 8/28/2014 10:14:18 AM
Subject: FW: Email from LCCOA

From: Cindy Curtis [mailto:ccurtis@centralmidlands.org]
Sent: Thursday, August 28, 2014 10:10 AM
To: Aging, PSA Help
Cc: Ben Mauldin; Reginald Simmons
Subject: Email from LCCOA

Please find requested information below concerning the direct email from Lynda Christison to Tony Kessler on August 26, 2014. I have reviewed the protocol and procedures with her. She has apologized for how the email was received and had no intentions of causing any negative issues between the LGOA office, the CMCOG/AAA and LCCOA. Her future inquiries will be forward to myself, or in my absense, to Ben Mauldin of which we will review the request, and if appropriate, send the communication to LGOA Single Point of Contact (SPOC) or AIM HELP.

On behalf of the CMCOG/AAA, we will work diligently to enhance the quality of life for our seniors and will maintain the the utmost professionalism while administering aging services throughout the Central Midlands region.

We also apologize for this incident. It will not incur again and our contractors were reminded of the current protocol.

Thank you for your continued support,

Cindy Curtis, LMSW
Interim Director
Area Agency on Aging
Central Midlands Council on Governments
803.744.5134 Office
803.744.5120 Main
803.376.5394 Fax
ccurtis@centralmidlands.org

Please work with Ms. Christison to gather information and to research on this issue. Please provide the following information:

The steps that were taken in AIM that resulted in this issue.

1. I was entering units in AIM for Batesburg-Leesville III C1 for the month of July 2014 via the service screen method. (Chapter V pages 1 – 4 of the AIM instruction manual distributed in March 2013)

2. When I finished the last client, and was going to save the data, a new client popped onto the screen with the same number of units as the last client I had entered.

3. AIM froze and had to be restarted.

4. The unknown client was still there. I could not delete the record, so I changed the units to 0.

5. I searched for the client in the client quick find using the last name. No record came up.

6. I searched for the client in LCRAC's CMS database. No record came up verifying that Christopher, W.T. is not a LCRAC client.

7. This morning I spoke with Dwayne at Saber and emailed him the information he requested.

8. Per Dwayne, this occurred due to multiple agencies over the years of AIM use inadvertently creating a blank record that, because it is blank, is shared by all of us. At the same time that I was entering units, someone at Piedmont put Christopher, W.T. into the shared blank record. Since the blank record was shared, somehow, he/she showed up in my service entry screen. I do not know, if when I was entering units, I somehow clicked on the blank record or not. When I went into AIM today with Dwayne, the client quick find in AIM refreshed and Christopher, W. T.'s information was in LCRAC's database instead of the blank record. As the blank record was shared by a good many SC agencies, it appears that Christopher, W.T.'s information may now be available to everyone who shared the original blank record.

Involved client identifications.

1. Last night, there was no AIM ID attached to the client, only the name Christopher, W.T.

2. Today, after AIM refreshed the client quick find, Dwayne showed me the record in LCRAC's database and I now have access to all of this person's information, including the assessment.

ADRC confidentiality policies and protocols.

Lexington County Recreation & Aging Commission Council on Aging Employee Confidentiality Form

Confidentiality and Disclosure of Information

LCRAC employee must ensure that no information about any client (older persons, adults with disabilities, family members, caregivers, etc.), nor any personal information obtained from a client by a provider/contractor or Area Agency on Aging (AAA)/Aging and Disability Resource Center (ADRC) is disclosed by the provider/contractor or AAA/ADRC.

LCRAC employee must ensure that lists of clients compiled under any programs or services are used solely for the purpose of providing or evaluating services. AAAs/ADRCs shall obtain written assurance from providers/contractors stating that they will comply with all LGOA confidentiality requirements, as well as any and all applicable federal and state privacy and confidentiality laws, regulations, and policies.

LCRAC employee must sign confidentiality agreements. All data shall be maintained in a secure and confidential manner at all times, and must be used only for the necessary and legitimate purposes for which the information is required. By signing this agreement form, users acknowledge that they understand the confidentiality agreement, and agree to adhere to the agreement.

Security and confidentiality is a matter of concern for all persons who have access to (LCRAC) information. Each person accessing (LCRAC) data and resources holds a position of trust relative to this information and must recognize the responsibilities entrusted in preserving the security and confidentiality of this information. Therefore, all persons who are authorized to access data and resources must read and comply with (LCRAC) policy. Violators may be subject to penalties, including disciplinary action, under policies of (LCRAC) and under laws of the State of South Carolina.

By signing this form, I agree that I have read, understand and will comply with the Agreement.

_____
Signature/Date

_____
Printed Name

LRAC Memorandums of Understanding/ Agreement and/or protocols.

1.   The provider/contractor ensures that lists of clients compiled under any programs or services are used solely for the purpose of providing or evaluating services. Provider/contractor gives written assurance stating that they will comply with all LGOA confidentiality requirements, as well as any and all applicable Federal and State privacy and confidentiality laws, regulations, and policies.

2.   The provider/contractor under the contract has written procedures for protecting the identifying client information against unlawful distribution through any means, physical or electronic. All identifying client data is protected through limited access to electronic records. Each employee with access to identifying client information must sign a notice prepared by the LCRAC specifying the requirement to maintain confidentiality and the penalty for failure to comply

Signed confidentiality agreement with the user entering the data.

1.   Every LCRAC Council on Aging staff person is required to sign a confidentiality agreement. See attached LCRAC Employee Confidentiality form. My signed form is on file in our human resources office.

Please define CMS.

1.   CMS, Client Management System, is a database designed by Anwar Robertson that LCRAC uses to track information on all clients served in all programs offered by LCRAC's Council on Aging. Many of these clients are not in AIM.

Clarify the email statement "He/she is not in either of our databases".

1.   After being unable to locate the client in AIM, I searched for him/her in CMS. Again, I found no record for this individual.

Please describe what data bases are being used.

o AIM

o CMS

What are the security protocols for any other databases?

- CMS is password protected, access to various parts/information is limited for each user based on his/her work related requirements. The database is housed on a on-site server that is also password and firewall protected and backed-up nightly.

Ms. Christison's technology experience and skills in AIM application development and security.

1. I have been using AIM since it was first introduced to South Carolina

2. I took multiple AIM training classes when they were being taught at the Summer School of Gerontology

3. I was an active member of the AIM Users Group run by Beth Hollingsworth

4. I have attended most, if not all AIM trainings/meetings offered since the use of AIM was initiated

5. I am proficient in both entering data and in running query builder reports

6. I have often been called upon by other agencies for help in using AIM

7. LCRAC takes client confidentiality very seriously. Access to AIM and CMS data and client files is limited to those whose work related responsibilities require access.

As a result of the nature of these grave accusations, please submit the requested information via Single Point of Contact by noon on Thursday, August 28, 2014.