

Resolution No: 20-08

**Amendment of Personnel Policies Consistent with Resolution 19-07**

WHEREAS, the Department of Administration was reorganized and the Department of Employee Relations was created through Resolution 19-07, and

WHEREAS, certain policies continue to give reference to the Department of Administration with respect to duties and responsibilities that were transferred to the Department of Employee Relations pursuant to Resolution 19-07; and

WHEREAS, pursuant to Personnel Policy No. 40, the Polk County Personnel Committee has reviewed policies that are cited herein and has made a recommendation to the Polk County Board of Supervisors to amend those policies consistent with the provisions of Resolution 19-07.

NOW THEREFORE BE IT RESOLVED that consistent with Resolution 19-07 the Polk County Board of Supervisors accordingly amends the following policies:

- 103 Employee Recruitment, Selection, and Status
- 209 Employee Performance Reviews
- 501B Bloodborne Pathogens
- 501.D Departmental Emergency/Fire Prevention
- 501.I Respiratory Protection Program
- 602.Q Physical Safeguards – Workstation Use
- 602.R Physical Safeguards – Workstation Security

as attached hereto and incorporated herein.

Funding Amount: N/A

Funding Source: N/A

Finance Committee Advised: Not Applicable

Finance Committee Recommendation: Not Applicable

Approved as to form: \_\_\_\_\_

*Jeffrey B. Fuge*  
Jeffrey Fuge, Corporation Counsel

Date Submitted to County Board: March 11, 2008

County Board Action: Adopted

Effective Date: Upon passage

Submitted at the request of the Personnel Committee

Russell E. Howard 2/28/08

K.T. [Signature]

Debra Brewer

Patricia Schmidt

Donald H. Newell

Polk County Wisconsin

EMPLOYEE RECRUITMENT, SELECTION, AND STATUS

Policy 103

Effective Date: 04-20-82

Revision Date: 3-11-08, 07-20-2004, 6-20-2006

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The purpose of this policy is to specify the procedures that will be used in the recruitment and selection of candidates to fill position vacancies in Polk County. Because Polk County recognizes that its' most valuable asset is its' employees, it shall be the goal of Polk County to recruit and hire individuals with the highest qualifications possible to fill position vacancies.

Equal Opportunity Policy

Polk County is committed to equality of opportunity in its employment practices without regard to an employee or employment candidate's race, color, national origin, religion, sex, age, or disability, political affiliation, marital status, sexual orientation, ancestry, arrest or conviction record, use of lawful products or military participation. It shall be the responsibility of all parties having authority under this policy to adhere to this requirement in the discharge of that authority.

Responsibility

Unless otherwise stated the duties and responsibilities of recruitment and selection rest solely with the Department of Employee Relations. With respect to position vacancies that occur at Golden Age Manor, the Employee Relations Director shall have the authority to delegate any of the responsibilities assigned to the Department of Employee Relations to the Administrator of Golden Age Manor as needed. Such delegation shall be in writing and subject to the approval of the Personnel Committee.

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Position Analysis prior to the Selection Process

When a position vacancy occurs the first step in filling the position is an examination by the immediate supervisor of the duties and responsibilities of the position, minimum qualifications required, and other desirable characteristics the applicant must possess. The immediate supervisor shall be responsible for the initial development or review of the job description, which shall include:

- a listing of the essential as well as marginal duties and responsibilities, minimum qualifications including education and experience, specific skills and certifications and the physical demands and work environment of the position.

Department heads may require that job descriptions in their department receive their approval prior to the start of the selection process.

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The Department of Employee Relations shall be responsible for giving final approval to job descriptions prior to the re-authorization process. Any changes to job descriptions that, in the opinion of the Employee Relations Director, have the potential to result in a wage scale re-classification, must also be approved by the governing committee and the Personnel Committee.

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The Department of Employee Relations shall also be responsible for reviewing the wage and benefit structure for each vacant position and shall make such recommendations as are warranted to the Personnel Committee for changes in such as part of the reauthorization process.

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Prior to the issuance of an offer of employment for any vacant position, any approvals that are required under the re-authorization provisions of the Position Administration Policy shall be obtained. Positions failing to receive these approvals shall not be filled.

### **Posting of Union Positions**

If the position is covered by a union or association contract, the position will be filled in accordance with any job posting requirements of such contracts or agreements prior to outside recruitment.

The Department of Employee Relations shall be responsible for the creation and distribution of all job postings required by collective bargaining agreements. At a minimum, the job posting will include a position title, a brief description of essential job functions, salary range, minimum qualifications, how to apply, the closing date and any other information required by the collective bargaining agreement. The posting shall be placed in all venues required by the agreement.

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The screening, testing, and interviewing of candidates shall be in accordance with any posting requirement set forth in the collective bargaining agreement. The Department of Employee Relations shall determine which applicants meet the minimum qualifications as listed in the job description. Applicants that do not meet the minimum qualifications shall be notified they are no longer under consideration for the position. All applications will be screened using standardized criteria.

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The Department of Employee Relations shall be responsible for the selection, approval and administration of all pre-selection tests. Testing requirements for all positions shall be established by the Department of Administration and listed in the respective job descriptions of each position. All tests shall be validated for adverse impact and scoring shall be on a standardized basis where appropriate. Only those applicants meeting the minimum requirements for the position shall be allowed to test. Minimum test score requirements shall be established prior to the administration of any test. Any applicant not meeting the minimum test score requirements shall not be considered for the position.

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In cases where physical or psychological screening is required for a position, candidates shall progress through the hiring process with such screening to be performed on the final candidate after a conditional offer of employment has been made.

The immediate supervisor shall conduct the interviews and make the final selection decision for all posted positions. In the case of professional ~~technical or skilled labor~~ positions, Department heads shall participate in the interviews, and the immediate supervisor shall consult with the Department head prior to making a final selection decision and appointment. In all cases, appointments shall be made based on the requirements set forth in the respective collective bargaining agreements.

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### Non-Union Promotions

The following procedure shall apply to promotions to non-union positions:

Non-union positions, which become vacant or are newly created, shall first be filled by promotion/appointment if there is an acceptable candidate currently employed by the county. All persons considered for promotion shall bear the burden of proof that they are qualified for the job.

The ~~Department of Employee Relations~~ shall be responsible for the creation and distribution of all job announcements for non-union promotional opportunities. At a minimum, the announcement will include a position title, a brief description of essential job functions, salary range, minimum qualifications, how to apply, and the closing date. The announcement shall be placed in all county facilities and on the county web site for a period of seven (7) calendar days.

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The ~~Department of Employee Relations~~ shall determine which applicants meet the minimum qualifications as listed in the job description. Applicants that do not meet the minimum qualifications shall be notified they are no longer under consideration for the position. All applications will be screened using standardized criteria.

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The ~~Department of Employee Relations~~ shall be responsible for the selection, approval and administration of all pre-selection tests. Testing requirements for all positions shall be established by the ~~Department of Employee Relations~~ and listed in the respective job descriptions of each position. All tests shall be validated for adverse impact and scoring shall be on a standardized basis where appropriate. Only those applicants meeting the minimum requirements for the position shall be allowed to test. Minimum test score requirements shall be established prior to the administration of any test. Any applicant not meeting the minimum test score requirements shall not be considered for the position.

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In cases where physical or psychological screening is required for a position, candidates shall progress through the hiring process with such screening to be performed on the final candidate after a conditional offer of employment has been made.

The Department of Employee Relations may identify one or more qualified individual(s) for promotion who are currently employed by the County.

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The following procedure shall apply to interviews for promotions to non-Department Head positions:

The Department Head and a member of the Department of Employee Relations staff shall conduct the first round of interviews for non-Department Head positions. The Department Head shall conduct the final interview for these positions.

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The Department Head shall make the final promotion decision. In the event the Department Head does not recommend promotion, the position must be filled through the normal competitive hiring procedure.

The following procedure shall apply to interviews for promotions to Department Head level positions:

The Employee Relations Director, the Administrative Coordinator and the Chair of the governing committee or his or her designee shall conduct the first round of interviews for Department Head management positions. The Administrative Coordinator and all members of the governing committee shall conduct the final interview for these positions. The Administrative Coordinator shall make a promotion recommendation (either for or against) to the governing committee who may then make a final selection and appointment. For those positions having statutory requirements with regard to appointment, the body or individual having the statutory authority of appointment may make a final selection and appointment after receiving the recommendation of the Administrative Coordinator.

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For the Corporation Counsel position, a preliminary committee comprised of one member from each of four of the standing committees, the second Vice-Chair, and the Employee Relations Director shall conduct the first interview. A final committee comprised of one member each from the remaining three standing committees, the first Vice Chair, and the County Board Chair will conduct the final interview. The County Board Chair shall make a promotion recommendation (either for or against) to the Executive committee who may then make a final selection and appointment. The full County Board must approve the appointment of the Corporation Counsel position.

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Upon selection of a final applicant, the Department of Employee Relations shall conduct a

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background reference check on the applicant prior to an actual offer of employment. Reference checks shall include verification of current and past employment, work experience and personal references.

### Competitive Selection Process

#### Recruitment Announcement

In instances where position vacancies are not filled through posting or promotion, the Department of Administration shall be responsible for the creation and distribution of all position announcements. Position announcements are required for all vacancies, with the exception of temporary and emergency positions, which may be filled by the Department of Administration in accordance with the County's Equal Employment Opportunity and Affirmative Action Policy. The following procedure shall be followed when announcing a position vacancy:

- A. At a minimum the position announcement will include a position title, salary range, how to apply, and the closing date. All announcements will also state "Polk County is an Equal Opportunity Employer".
- B. Position announcements shall be posted on the County web site. The announcements must also be placed in the official County newspaper for a minimum of one week. The announcement will also be emailed to all of the counties in Wisconsin capable of receiving such. In addition, the position shall be announced in any venue deemed appropriate for the position by the Employee Relations Director or Employee Relations Manager.

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#### Screening Applications

All applications will be evaluated by the Department of Employee Relations to determine which applicants meet the minimum qualifications as listed in the job description. Applicants, who do not meet the minimum qualifications, shall be notified by letter they are no longer under consideration for the position. All applications will be screened using standardized criteria.

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Testing

The Department of Employee Relations shall be responsible for the selection, approval and administration of all pre-employment tests. Testing requirements for all positions shall be established by the Department of Employee Relations and listed in the respective job description of each position. All tests shall be validated for adverse impact and scoring shall be on a standardized basis where appropriate. Only those applicants meeting the minimum requirements for the position shall be allowed to test. Minimum test score requirements shall be established prior to the administration of any test. Any applicant not meeting the minimum test score requirements shall not be considered for the position.

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In cases where physical or psychological screening is required for a position, candidates shall progress through the hiring process with such screening to be performed on the final candidate after a conditional offer of employment has been made.

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Evaluation of Applications

All applicants who have met the minimum requirement for the position and who have received a passing score on any tests required for the position shall have their application evaluated for education and experience. All application scores shall be standardized for consistency.

The Employee Relations Director and/or the Employee Relations Manager shall evaluate applications for clerical, administrative, and unskilled labor positions.

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In the case of professional, technical, and skilled labor positions, the Employee Relations Director or the Employee Relations Manager and the immediate supervisor will score applications.

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The Department Head and the Employee Relations Director shall evaluate applications for non-department head supervisory positions.

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The Employee Relations Director and the Administrative Coordinator shall evaluate applications for Department Head level positions.

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A. Evaluation of Education and Experience - All candidates will be evaluated for education and experience and a numerical rating assigned. No credit need be given for education beyond that required unless it enhances the applicants ability to perform the work. The format of the evaluation for each position shall be determined prior to the evaluation of applications. All applications shall be scored on a standardized

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basis.

- B. Veteran's Preference - Veterans are given preference in the hiring process through the addition of points to evaluation scores. Proof of service and/or disability must be provided.

The veteran's preference will be applied in the following manner:

1. Points equivalent to five percent of the total possible score will be given to veterans discharged under honorable conditions from active duty with the United States Armed Forces. Points equivalent to ten percent of the total possible score will be given to veterans with service-connected disabilities. (Active duty for training purposes as a member of the National Guard or a Reserve component is not creditable for veteran's preference points.)
  2. Veteran's preference will be applied only for initial County employment and cannot be used for promotion or transfer purposes.
  3. The points awarded to veterans will be applied only as part of the application evaluation process.
- C. Selection of Candidates for Interviews – Based on the evaluation of applications, the Department of Administration shall determine which candidates shall receive an interview for the position.

Initial Background Check

The Department of Administration shall conduct a basic criminal background check and an educational background verification on all applicants selected for interviews prior to the scheduling of such interviews. Any applicant whose educational background cannot be verified, or for whom there is an arrest or conviction record for offenses substantially related to the duties and responsibilities of the position shall be eliminated from further consideration.

Interviews and Finalist Selection

Only individuals who have received training from the Department of Employee Relations shall be allowed to interview applicants for positions.

The responsibility for conducting interviews for the various positions shall be as follows:

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The Department of Employee Relations shall be responsible for conducting the initial interviews for all clerical, administrative, maintenance, seasonal, and other unskilled positions. The Department of Employee Relations may choose to establish a pool of qualified applicants for various positions in the County or may establish a list of qualified applicants for individual positions. Immediate supervisors shall conduct final interviews for these positions from a list of applicants provided by the Department of Employee Relations. The immediate supervisor may make the final selection and appointment from the list of those interviewed.

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The immediate supervisor shall conduct the interviews and make a final selection decision and appointment for all technical, professional and skilled labor positions. Department heads shall participate in these interviews, and the immediate supervisor shall consult with the Department head prior to making a final selection decision and appointment.

The first round of interviews for non-Department Head management positions shall be conducted by the Department Head and a member of the Department of Employee Relations staff. Reference checks (see below) shall be conducted on applicants prior to the scheduling of a second interview. The Department Head shall conduct the final interview and make the selection and appointment for these positions.

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The first round of interviews for Department Head management positions shall be conducted by the Employee Relations Director, the Administrative Coordinator and the Chair of the governing committee or his or her designee. Reference checks (see below) shall be conducted on applicants prior to the scheduling of a second interview. The Administrative Coordinator and all members of the governing committee shall conduct the final interview for these positions. The Administrative Coordinator may make a selection recommendation (either for or against) to the governing committee who may then make a final selection and appointment. For those positions having statutory requirements with regard to appointment, the body or individual having the statutory authority of appointment may make a final selection and appointment after receiving the recommendation of the Administrative Coordinator.

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For the Corporation Counsel position, a preliminary committee comprised of one member from each of four of the standing committees, the second Vice-Chair, and the Human Resource Director shall conduct the first interview. A final committee comprised of one member each from the remaining three standing committees, the first Vice-Chair, and the County Board Chair will conduct the second interview. The County Board Chair shall make a selection recommendation (either for or against) to the Executive committee who may then make a final selection and appointment. The full County Board must approve the appointment of the Corporation Counsel position.

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**Reference Checks**

Upon selection of a final applicant through either the promotion or competitive hiring process, the Department of Administration shall conduct a background reference check on the finalist prior to an actual offer of employment. Reference checks shall include verification of current and past employment, work experience and personal references.

**Criminal Background Check for Direct Care Providers**

The Department of Employee Relations shall conduct a criminal background check as required for all positions involved in the provision of direct care. Such background checks shall be performed in accordance with the requirements of state and federal statutes. Offers of employment for such positions can only be made on a conditional basis until such time as these requirements have been satisfied. Any candidate given such a conditional offer shall not perform any direct care duties until such time as this process is complete. Any employee found unable to satisfy these requirements shall have their employment with the County terminated.

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**Offers of Employment**

Only the Employee Relations Director or his/her designee shall have the authority to make offers of employment. No other employee or official of Polk County shall have the authority to make actual or implied offers of employment or commitments regarding employment decisions, wages, or fringe benefits, and are prohibited from making statements to that effect. Selected applicants will receive a written offer of employment based on the specific requirements of each position. In cases where physical, psychological, or criminal history screening is required for a position, the finalist shall be given a conditional offer of employment pending the successful outcome of any such screening.

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**Employment Registers**

Whenever competitive recruitment and selection activities are undertaken for a particular job title, up to five qualified applicants may be placed on an employment register by the person(s) responsible for making the final selection for the position. The employment register shall be utilized to fill vacancies in that particular job title that may occur within one year of the date of the establishment of the register. Reference checks must be performed on all applicants prior to their inclusion on an employment register.

**Recruitment Records**

The Department of Employee Relations shall be responsible for the maintenance of all selection

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and recruitment records.

- A. Content - Each file must contain the applications of all who applied. It must also contain all the information that led to the selection of the successful candidate. (e.g. test results, interview rating forms, interview questions, reference checks).
- B. Responsibility - The records shall be compiled by and stored in the Department of Employee Relations.
- C. Storage & Disposal - Files will be maintained for seven (7) years; except that if a discrimination complaint has been filed records will be maintained until final disposition of the case.

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Register of Applicants – A database of the positions and applicants will be kept for one year to be used to fill position vacancies along with new applicants.

**Employment Status**

- A. With the exception of Department Heads appointed or promoted after January 26, 1999, the removal of any appointed or promoted individual who has passed a determined probation period, will be for just cause only utilizing county disciplinary procedures as specified in the County's Employee Discipline Policy.
- B. Except as otherwise provided by law or policy, the employment status of Department Heads appointed or promoted after January 26, 1999 shall be considered "at will." The termination of an "at will" Department Head shall be as specified in the County's Employee Discipline Policy.

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**Payroll Direct Deposit**

Employees must receive their payroll checks in the form of a direct deposit of funds to their bank account. These employees shall complete all necessary requirements of the Department of Employee Relations and their financial institution in order to effect this procedure.

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Polk County Wisconsin

EMPLOYEE PERFORMANCE REVIEWS

Policy 209

Effective Date: 07-19-94

Revision Date: 3-11-2008, 09-09-03, 5-17-05

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Policy Statement

Polk County believes that employee performance reviews conducted on a regular and timely basis are a valuable employment tool, which benefits both employer and employee. Supervisors and employees are strongly encouraged to discuss job performance and goals on an informal, day-to-day basis. Furthermore, it shall be the policy of Polk County that all of its employees shall be evaluated on a regular basis in accordance with the procedures outlined in this policy.

Frequency of Performance reviews

Probationary Period

All employees shall be subject to a performance evaluation during their probationary period. During the probationary period, the supervisor(s) and the employee shall discuss the job responsibilities, standards, and performance requirements of the new position. Informal performance evaluations are to be conducted throughout this period as needed to provide both supervisors and employees the opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals. All employees shall receive a formal performance evaluation not more than thirty and not less than five days prior to the end of their probationary period.

Annual Basis

All non-limited employees, except Department Heads, shall receive a formal performance evaluation not more than thirty days prior to or after their annual anniversary based on date of hire in their current position. Department Heads shall receive a formal performance evaluation by January 31<sup>st</sup> of each year.

Procedure Manual

The Employee Relations Department shall publish and maintain a performance management procedure manual that shall be subject to review and approval of the Personnel Committee.

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## Responsibility for Performance reviews

The primary responsibility for conducting employee performance reviews shall be as follows:

### Regular Employees

Regular employees shall be evaluated by their immediate supervisor, annually, who shall consult with and consider the comments of their Department Head as to the review process used by the supervisor as well as specific items, which pertain to the employee. This consultation shall take place during the review writing process and prior to the interview with the employee.

### Supervisors

Supervisors shall be evaluated by their immediate supervisor annually.

### Department Heads

Non-elected Department Heads shall be evaluated by their governing committee, annually, who shall consult with the Employee Relations Director as to the review process used by the committee. This consultation shall take place during the review writing process and prior to the interview with the employee. Each member of the committee shall complete a performance review document, and the performance interview with the employee shall be conducted by the committee. Prior to the interview, the committee shall by majority vote make a determination as to the overall performance of the Department Head. Any plan of corrective action proposed must also be approved by majority vote of the committee.

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## Review Procedures

### Preparation

The evaluation process should be an unending cycle of activity, which begins when the employee is first hired and continues on a regular basis until they separate employment from the County. In order to facilitate this process, supervisors, Department Heads, and governing committee members are encouraged to keep supervisory notes throughout the year. In addition, formal and informal meetings may be held with employees to discuss various aspects of their performance, which demand immediate attention.

The employee's job description shall serve as the initial basis for the performance review. Information relevant to the review may be considered from sources internal or external to Polk County. Previous reviews, supervisory notes, and other information in the employee's personnel file which, pertains to the review period, should also be consulted. Finally, the employee should be asked to complete a self-evaluation as part of the preparation phase.

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Writing the Review

All employee performance reviews shall be conducted using standardized forms developed by the Employee Relations Director and approved by the Personnel Committee. The Employee Relations Director shall design a standardized form for each type of position to be evaluated. The procedures will be delineated in the Performance Management Procedural Manual.

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There shall be a section detailing a Plan of Corrective Action. The Plan shall detail all of the elements in which the employee's performance was deemed to be unsatisfactory, and for each element shall contain specific corrective actions which are to be taken by the employee to remedy the deficiency. In addition, there shall be a target compliance date established for each item, by which time the employee's performance must be satisfactory. Compliance dates shall be set no more than ninety (90) days after the review interview is conducted with the employee unless it is determined by the reviewer that it is impossible for the employee to meet the deadline, in which case another date may be set.

Interview with Employee

Each employee shall be given a performance review interview. The purpose of the interview shall be to review each section of the performance review with the employee through a face-to-face and personal format designed to enhance the employee's understanding of the written document. In addition to the Performance Review document, the self-evaluation conducted by the employee shall be discussed. Employees shall be encouraged to ask questions during this process, and to offer comments appropriate to the performance review process. Employees shall have an opportunity to make written comments in the "Employee Comments" section of the document. The employee may take up to seven (7) days after the interview to add comments to the document.

If the employee performance review calls for the implementation of a Plan of Corrective Action, it shall be discussed with the employee during the interview. The employee shall be encouraged and given an opportunity to contribute towards the final version of the plan. Prior to the end of the interview, the reviewer shall verbally enumerate the expectations of the employee that are detailed in the plan and the deadline for the employee to meet those expectations.

Employees Completing Probation

If the employee's performance is determined to be satisfactory, the employee shall be granted non-represented status in their position in accordance with the guidelines of the County position administration Policy 881. If the employee's performance is determined to be unsatisfactory in one or more areas, their employment with the County shall be terminated, unless the employee's supervisor determines that a corrective plan of action is warranted. The employee's employment with the County may continue subject to a corrective plan of action, and to extend the probationary period for a specific length of time. Corrective plans of action shall be implemented

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subject to the guidelines set forth in this policy. The employee may continue employment with the County until a subsequent performance review is conducted at which time a final decision regarding the employee's status shall be made. If the employee refuses to agree to a corrective plan of action or an extension of the probationary period, the employee's employment with the County shall be terminated.

Non Limited Employees

Non-Limited employees that receive a satisfactory review shall have the review made part of their permanent work record and shall continue in their current employment status with the County.

In the event the employee receives an unsatisfactory review, a corrective plan of action shall be implemented subject to the provisions of this policy. A subsequent performance review shall be scheduled to determine if the employee has attained satisfactory performance in the areas of deficiency. If this subsequent performance review determines that satisfactory performance has been attained, the review shall be made part of the employee's permanent work record along with the initial review and the plan of corrective action, and the employee shall continue in their current employment status with the County. If it is determined that the employee's performance is still unacceptable, the supervisor, Department Head, or in the case of Department Heads, the governing committee shall take such further steps as they deem appropriate and that are consistent with the County's personnel policies including but not limited to other actions deemed appropriate to ensure employee performance will reach an acceptable level.

Confidentiality

All records pertaining to employee performance reviews are considered to be confidential in nature. Supervisors, Department Heads, and governing committees shall be held to a strict standard of confidentiality and are prohibited from discussing the details of any performance review with anyone except the employee, a duly authorized representative of the employee, or other person(s) participating in the drafting of the review. Except as specifically provided for under County Ordinances, State Statutes, or Federal Law, no record of an employee's performance review may be made available to any individuals except the employee or a duly authorized representative of the employee, without the express written consent of the employee.

The Department of Employee Relations shall receive the original employee performance reviews to ensure Polk County's compliance with its legal and contractual obligations. All meetings conducted as part of the review process shall be closed to the public in accordance with County Ordinances, State Statutes, or Federal Law. No County Board Supervisor shall be allowed to sit in on, attend or participate in the closed session meeting of a governing committee or Board that is conducting the performance evaluation of any Department Head.

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Individuals found to have violated the confidentiality requirements of this policy shall be subject to the disciplinary policy of the County and in the case of elected officials, possible censure by the County Board.

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Polk County Wisconsin

BLOODBORNE PATHOGENS POLICY

Policy 501.B

Effective Date: 03-16-99

Revision Date: 3-11-2008

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**Purpose**

The purpose of this policy is to minimize occupational exposure to Hepatitis B Virus (HBV), Human Immunodeficiency Virus (HIV), and other bloodborne pathogens and to assure that no employee will suffer material health or functional impairment due to exposure to hazardous agents while in the course of their employment with Polk County.

**Definitions**

- A. Occupational Exposure is any reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or any other potentially infectious materials that may result from the performance of an employee's duties.
- B. Exposure Incident means a *specific* eye, mouth, other mucous membrane, non-intact skin, or parenteral contact with blood or other infectious materials that results from the performance of an employee's duties.
- C. Other potentially infectious materials include:
  - 1. Any fluid or solid that is visibly contaminated with blood.
  - 2. All body fluids in situations where it is difficult or impossible to differentiate between body fluids.

**Exposure Determination**

Each Department of Polk County is responsible for determining which job classifications have occupational risk for bloodborne pathogens and shall file a list of those classifications with the Employee Relations Director.

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## Employee Education and Training

All employees with occupational exposure will be trained by an individual who has been designated by the Department of Employee Relations for that purpose. New employees shall receive orientation with regard to this policy at the time of initial work assignment (within 10 working days) and at least annually thereafter. Training shall include:

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1. Information about the hazards associated with blood and other potentially infectious materials and the protective measures to be taken to minimize the risk of occupational exposure.
2. Information about the methods of transmission, the Exposure Control Plan, and the use of Engineering Controls, Work Practices, and Personal Protective Equipment.
3. Information about the appropriate actions to be taken in an emergency involving exposure to blood and other potentially infectious material.
4. Reasons why Hepatitis B vaccination and post-exposure evaluation and follow-up are important.
5. Educational materials that are appropriate to the employee's vocabulary, educational level, and language.
  - a. Time will be allowed for questions and review of materials as needed.
  - b. The trainer will be knowledgeable in the subject matter covered.

## Work Practice Controls

It is the intent of this policy to reduce the likelihood of exposure through the alteration of the manner in which tasks are performed. Employees are encouraged to bandage or administer their own first aid whenever possible. In addition, Polk County will utilize the following work practice controls:

1. Universal Precautions: an approach to infection control whereby all human blood and certain human body fluids are treated as if known to be infectious for HIV, HBV and other bloodborne pathogens.
2. Hand washing Procedure. (See Appendix A)
3. Procedures for sharps handling

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4. Eating, drinking, smoking, applying cosmetics or lip balm, or handling contact lenses are prohibited in areas where there is reasonable likelihood of occupational exposure.
5. Polk County will provide appropriate personal protective equipment and it will be readily accessible at the work site or issued to employees as appropriate.
  - a. The following measures shall be utilized by personnel as indicated:
    - (1) Protective Gloves. The use of gloves is indicated for procedures where body fluids are handled and particularly important in the following circumstances:
      - (a) If the worker receives a cut or abraded skin, the person dressing or assisting will wear protective gloves to bandage the cut.
      - (b) During all cleaning of body fluids and decontaminating procedures.
      - (c) During any direct first aid incidents not for day-to-day occupational use.
    - (2) Cloth Gloves will be worn where appropriate to reduce the exposure to sharp or abrasive materials.
    - (3) Gowns. The use of gowns, aprons, or lab coats is required when splashes to skin or clothing with body fluids are likely to occur. Gowns shall be made of, or lined with, fluid-proof or fluid-resistant material and shall protect all areas of exposed skin. Gowns will be available for any situation requiring first aid response.
    - (4) Masks and Eye Protectors. The use of masks and protective eye wear or face shields is required when contamination of mucosal membranes, eyes, mouth or nose with body fluids such as splashes or aerosolization of such a material, is likely to occur.
    - (5) HBV Vaccination
      - (a) HBV Vaccinations are the most important part of HBV

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infection control because gloves and other Personal protective Equipment do not prevent puncture wounds or unanticipated exposures.

- (b) HBV Vaccinations shall be made available to all employees who have occupational exposure after they have received training and within 10 working days of initial assignment.
  - (c) If an employee had previous HBV Vaccination, or if antibody testing reveals immunity, the HBV Vaccination is not necessary.
  - (d) If an employee initially declines, then eventually wants HBV Vaccination, the County shall provide it at that time.
  - (e) Employees who decline to accept the Hepatitis B Vaccination offered by the agency will sign the Hepatitis B Vaccine Declination Form.
- (6) Post exposure evaluation and follow-up:
- (a) Following a report of an Exposure Incident, the County shall make available a confidential medical evaluation, which will include:
    - documentation of route of exposure and circumstances
    - HIV/HBV status of source individual
    - Serological testing of blood ASAP
    - Post-exposure vaccine (if indicated)
    - Medical evaluation of reported illnesses
    - Counseling
  - (b) The treating physician is to be provided with a copy of the bloodborne pathogens policy and a description of the employee's duties and occupational exposure.
  - (c) The County shall obtain and provide the exposed employee with a copy of the physician's written opinion within 15 working days of the completion of the evaluation.
  - (d) The physician's written opinion for post-exposure evaluation and follow-up shall be limited to the following information:

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- That the employee has been informed of the results of the evaluation.
- That the employee has been told about any medical conditions resulting from the exposure to blood or other potentially infectious materials which require further evaluation and treatment.
- ALL OTHER FINDINGS AND DIAGNOSES ARE TO REMAIN CONFIDENTIAL.

## Engineering Controls

It is the intent of this policy to reduce employee exposure in the workplace by either removing the hazard or isolating the worker from exposure. To achieve this goal, the following engineering controls will be adopted by the County:

1. Regulated Waste Disposal
  - a. Disposal of all Regulated Waste shall be in accordance with applicable Federal, State and local regulation.
2. Housekeeping Procedures
  - a. Departments shall ensure the work site is maintained in a clean and sanitary condition. (Hospital grade virucide or 1:10 bleach to water solution.) If a bleach solution is made, it shall be changed daily.
  - b. All equipment, environmental surfaces and work surfaces shall be decontaminated ASAP after contact with blood or other potentially infectious materials.
  - c. All bins, pails, cans, plastic liners, and similar receptacles intended for reuse which have a likelihood for becoming contaminated with potentially infectious materials shall be inspected and decontaminated on a routine basis or cleaned as soon as visibly soiled.
    - (1) When needles are moved to a different container, receptacles must be disinfected.
  - d. Broken glass, which may be contaminated shall not be picked up directly with the hands. The employee must use mechanical means.

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## Record Keeping

The County will establish and maintain accurate record for each employee with an occupational exposure incident. Information to be included in this record shall be:

- a. Name of employee and Social Security Number
- b. Copy of employee's HBV Vaccination records
- c. Copy of all medical testing and findings
- d. Copy of physician's written opinion

The County will maintain these records for the duration of employment plus 30 years. The County will ensure confidentiality of all records in accordance with existing state, federal, and local statutes, rules, policies, and ordinances.

Employee Medical Records will be made available on request to the subject employee, to OSHA, or to anyone having written consent of the subject employee for examination and copying. Employee Training Records shall be provided upon request for examination and copying to employees, to employee representatives, and to OSHA. Training Records shall include:

- a. Names and job titles of all persons attending the training
  - b. The contents or summary of the training session.
  - c. The name and qualifications of the person
  - d. The dates of the initial training and any follow-up training
- (1) Employer shall maintain these records for three (3) years from the date on which the training occurred.

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## APPENDIX A

### HAND WASHING POLICY

- A. Proper hand washing practices are the single most important activity that can be implemented to prevent the spread of infection.
  1. Hand washing procedure
    - a. Wet hands under running water
    - b. Using mechanically dispensable soap, apply friction by rubbing hands together well, paying special attention to nails and other crevices. Do this for 30 seconds
    - c. Rinse with running water
    - d. Dry hands with single service disposable paper towel
    - e. Turn faucet off with paper towel and then discard (this is for hand operated faucets)
  2. Hand washing will be done before breaks and lunch. Any other time that constitutes it.
  3. Employees without access to running water on demand shall provided and shall modify the procedure listed in (1) above and use a water-less germicidal agent as provided by the County.

Polk County Wisconsin

DEPARTMENTAL EMERGENCY/FIRE PREVENTION

Policy 501.D

Effective Date: 07-17-01

Current Revision Date: 3-11-08

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PURPOSE

Emergency conditions that seriously threaten the safety of our employees may require the implementation of emergency procedures. This policy has been written to comply with 29 CFR 1910.38: the Emergency Evacuation and Fire Prevention Standard. This policy includes the following basic elements:

Emergency Evacuation

1. Escape procedures and escape routes
2. Procedure to account for all personnel
3. Rescue and medical duties assignment
4. Means of reporting fires and emergencies
5. Identification of responsible persons

SCOPE

This policy will apply to all employees, visitors and contractors within the County buildings.

REPORTING FIRES AND EMERGENCIES

Any employee who discovers a fire shall immediately pull the fire alarm or complete an all building page and report the emergency by calling 911, who will notify the local Fire Department and the County Sheriff or designee.

AUTHORITY TO ORDER AN EVACUATION

The authority to order an evacuation is assigned to the County Sheriff who shall designate authority to a primary Building Fire Coordinator and an alternate person for each building. The order to clear an evacuation and to return to normal duties and work areas also rests with those individuals.

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## FACILITY DIAGRAMS/EVACUATION ROUTES

Facility diagrams will be posted throughout all County facilities. These diagrams will be easy to understand, and designate the routes to exits during a fire emergency. These diagrams will also include the assembly areas, i.e. parking lots, etc. Polk County Department of Employee Relations in consultation with the Building Fire Co-coordinator is responsible for generating and posting the emergency routes where applicable. The Employee Relations Manager will review the diagrams, at least annually.

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## EXITING OFFICE AREAS

Each specific Department will specify procedures for securing important documents. The last employee out of the office will close the door. Employees will inform the general public of the procedure to evacuate.

**DO NOT USE THE ELEVATOR DURING EVACUATION.  
ALWAYS USE THE STAIRS following the closest exit route.**

## ASSEMBLY AREA

When employees evacuate to the outside, they will assemble in the employee parking area away from the building, remain there until further directions have been given, and a head count has been completed. Employees will remain at this location until the person in charge has given the all clear. The Department Head or supervisor will perform the head count, and maintain appropriate employee lists. In case of inclement weather, the person in charge will designate an area to evacuate to after completing the head count.

## UNACCOUNTED INDIVIDUALS

During an evacuation, individuals who are not accounted for during the head count are assumed to be in the building, and the supervisor will immediately notify the emergency response officials. **DO NOT GO BACK INTO THE BUILDING.** No employee will be allowed to re-enter the building until the all clear is given.

## INDIVIDUALS WITH DISABILITIES

Employees are responsible for assisting disabled individuals to follow the emergency plans.

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## EMERGENCY ORGANIZATIONS

Emergency response organizations, such as the Fire Department, Sheriff Department, or ambulance, shall be notified by telephoning 911. When emergencies are reported, the following information will be provided:

1. Nature of emergency/location
2. Caller name
3. Address/Location
4. Injuries if they exist

## LIAISON CONTACT

The assigned Building Fire Coordinator is responsible to meet an emergency responding organization, give information to them, to provide for clear and concise directions, and act as an escort if requested. In the absence of the Building Fire Coordinator, that authority is transferred to the designated alternate person

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The County Sheriff will act as the Public Information Officer (PIO) to disclose information to the media, radio, and television. In the absence of the County Sheriff, that authority is transferred to the designated alternate person. No other employees are given the authority to comment or make statements to the media regarding emergency evacuations or procedures.

## EMPLOYEE TRAINING

Polk County Department of Employee Relations will schedule drills and provide this policy to each employee. Training records of drills will be kept by the Department of Employee Relations. All new employees or transferring employees will receive training as to the policy, exits, assembly areas, etc.

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## PROGRAM REVIEW

The Employee Relations Manager in consultation with the Building Fire Co-coordinator will review this policy annually, who will be responsible for recommending changes in the event they are warranted. Administrative rules that prevent fire hazards may be added to this policy with approval of the Personnel Committee.

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**Polk County Wisconsin  
RESPIRATORY PROTECTION PROGRAM**

**Policy 501.I**

**Effective Date: 5/21/02**

**Current Revision Date: 3-11-08**

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The 29 Code of Federal Regulation 1910.134 mandates the respiratory protection program for those individuals exposed to hazards which require respiratory protection. Common hazardous atmospheres include: toxic vapors, mists, dusts, or fumes which are present during work procedures.

**Scope**

The scope of this program as defined by the Code of Federal Regulations includes those individuals employed at Polk County and governs the selection and use of respirators in the course of work.

**Objective**

The objective of this program is to minimize breathable hazards and insure safe working conditions for Polk County employees. Thus, the proper implementation of this program will follow adherence to the laws and regulations set forth by the Occupational Safety and Health Act adopted in 1999 for County Governments.

**Program Elements**

This program will include the following elements:

- Selection of a Program Coordinator for Polk County.
- Identification of those tasks / areas which require respirator use.
- Identification and selection of proper respiratory protection related to the respirable hazard present.
- Identification of individuals that will be included in this program.
- Coordination of medical management and those related documents.
- Allow for the training of respirator use, which includes: fit test, cleaning, storage, inspection, etc.
- Evaluation of this program as often as necessary to ensure that Polk County employees are being adequately protected.

**Expectations and Accountability**

All management staff at Polk County will support the Program Coordinator in all efforts to implement the Respiratory Protection Program. Management will attend mandated training sessions and provide training opportunities to employees as required by this policy. Management will require employees to attend training when scheduled. Management will also report in writing any non-compliance with the program in a timely fashion to the Program Coordinator or the Department of Employee Relations.

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### Program Coordinator

The Polk County Highway Commissioner has been designated the Program Coordinator for the Polk County Respiratory Protection Program. The Program Coordinator is responsible for the implementation of the program elements, program review, and changes to this program when required. Identification of areas or tasks in which a respirator will be worn rests with the collaborative efforts of the Employee Relations Manager and the Program Coordinator. The Program Coordinator and Employee Relations Manager will provide documentation of the physical requirements of those jobs requiring the usage of a respirator to the physician who completes medical evaluations of employees. Material Safety Data Sheets of chemicals and / or hazardous materials information will also be provided to the physician for his review. All records related to this program will be maintained by the Department of Employee Relations, with copies forwarded to the affected department designees. Records generated will be kept for a minimum of 3 years and will be considered confidential.

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### Employee

Any employee, who must enter designated areas requiring respirator donage, will attend training and pass the respirator fit test. No employee will be allowed to wear a respirator, which does not properly fit. Employees that have a properly fitted respirator and have attended training are required to wear the respirator in the designated areas and while performing those tasks that require respirator use. Any employee, who does not wear the respirator during those specified times, will be disciplined. This program requires medical management and employees will complete the required medical evaluation questionnaire.

### Respirator use and selection

A respirator is a device worn over the mouth and nose for protecting the respiratory tract of the employee from foreign substances in the air. Personal respiratory protection equipment will be provided and used when:

1. It is impossible to enclose or isolate a hazardous process or piece of equipment.
2. Necessary ventilation cannot be provided or is not yet installed
3. Other control measures are not feasible.
4. It is recommended for possible emergency situations.

Respiratory protection is considered the last resort. It must not be substituted for engineering controls where such controls are feasible. There are six basic types of respiratory protection devices, some of which may be needed at Polk County in the course of work and are described below:

1. Mechanical Filters offer protection against airborne particulate matter including dusts, mists, metal fumes, and smokes. Masks are of a soft resilient material full or half mask face piece to which one of several types of mechanical filters are attached. The filters are made of fibrous materials, which physically trap particles as air is inhaled through the materials. Respirators are certified by NIOSH for one or any combination of particulate hazard. Those hazards can be nuisance, fibrosis-producing and /or toxic dusts, mists, and fumes.

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2. Chemical Cartridge Respirators afford protection against high concentrations of certain acid gases and organic vapors by utilizing various chemical filters to purify the inhaled air. These respirators are “Non-Emergency” respirator protective devices and should never be used in dangerous atmospheres. Oxygen must be present at all times to support life.
3. Combination Respirators are dust, mist or fume mechanical filters plus a chemical cartridge for dual or multiple exposure. Spray painting is a common job where combination respirators are used frequently.
4. Gas Masks consist of a full face piece connected by a flexible breathing tube to a canister under the chin, carried in a harness on the chest, under the arm, or on the back. Inside the canisters are materials that remove contaminants and purify the air. The materials in the canister depend upon the type of contaminant. One must be extremely careful in selecting the proper canister fill.
5. Self-Contained Breathing Apparatus feature a unique aspect in that the wearer need not be connected to a stationary air source. The wearer carries enough oxygen or air supply for up to four hours. This type of respirator provides protection against all types of atmosphere contaminants in any concentration that can be endured by the skin. There are two basic classifications of self-contained breathing apparatuses – ‘closed circuit” and “open circuit”. In the close circuit type the air is re-breathed after the exhaled carbon dioxide has been removed and the oxygen content restored. The closed circuit type offers a longer continuous period than does the open circuit devices, which exhaust the exhaled air into the atmosphere rather than re-circulate it. Closed circuit self-contained breathing apparatuses operate under negative pressure, thus they have limited usage.
6. Air supplied Respirators feature air that is supplied from a stationary, remote source to the wearer though a hose. Air supplying respirators are divided into three types: hose-masks; air-line respirators; and abrasive blasting hoods.
  - Hose masks supply air from an uncontaminated source through a strong, large diameter hose.
  - Airline respirators all use a stationary source of compressed air delivered though a high-pressure hose. Respirators are available in demand, pressure-demand, and continuous flow configurations. The respiratory-inlet covering may be a face piece, helmet, hood or complete suit.
  - Abrasive blasting respirators are essentially air supplied respirators which have been modified by the additions of a suitable covering to protect the head and shoulders against impact and abrasion by rebounding materials.

### **Selection of Employees and Respirators**

Normally, a respirator places a physiological stress upon the wearer. It is an air-purifying device, which makes it difficult for the employee wearing one to breath. This is due to the fact that a fiber or cartridge impedes the airflow. One must adjust the normal breathing pattern to compensate for this fact. Wearers must not have a history of any lung disease at the present or past such as asthma, emphysema or bronchial spasms. Nor may they have a history of heart disease, high blood pressure, or artery disease. All employees who are required to wear a respirator will be medically evaluated to determine that the employee is physically able to perform work and wear the respirator.

### **Medical Evaluation**

The physician will be provided with the "job description, respiratory selection documentation and the medical questionnaire". 1910.1001 App. D Part I when certifying an individual for respirator use. "1910.1001 App. D part II will be used as dictated by the code as the "Periodic Medical Questionnaire" Medical evaluation will include but is not limited to:

- Health history with particular emphasis on any previous respiratory or heart disease.
- Chest X-ray if required by physician.
- Pulmonary function tests (FVC and FEV).
- Hands on physical evaluation.
- Any other test the physician deems necessary.

The physician will submit in writing the completed Professional Recommendation on Respirator use certification of findings to the Department of Employee Relations. Medical management will be provided should an employee need medical attention related to any respiratory illness contracted in the course of work.

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### **Training**

The Program Coordinator is responsible for the implementation of an annual training program related to respirators. It shall include the following:

- Definition of a respirator (s), selection and use.
- Proper storage, maintenance, cleaning and pre-use inspection.
- Semi-annual fit tests and point of use fit check as specified by 1910.134 Code of Federal Regulations and /or the manufactures' protocol.
- Factors and signs of respirator failure.

Department managers, supervisors, and employees using respirators will receive a training session on usage of respirators on at least an annual basis. All documents related to training records, fit tests and /or fit checks will be maintained by the Department of Employee Relations.

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### **Program Evaluation**

The Respiratory Protection Program shall be evaluated annually by the Program Coordinator and updated as necessary. The Checklist for Respiratory Protection Programs will be used as an evaluation tool. If new regulations are imposed, the Program will be evaluated and updated at that time.

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**Polk County Wisconsin**  
**PHYSICAL SAFEGUARDS**  
**Workstation Use Policy and Procedures**  
**45 CFR §164.310 (b)**  
**REQUIRED**

**Policy 602.Q**

**Effective Date: October 12, 2004      Revision Date: 3-11-2008**

**Policy**

- A. Polk County Government will implement policies and procedures that specify the proper functions to be performed, the manner in which those functions are to be performed and the physical attributes of the surroundings of the specific or class of workstation that can access electronic protected health care information (EPHI).
- B. The purpose of the Workstation Use Policy and Procedures is to support the current, or upgraded version of, Polk County Computer Policy and delineate acceptable workstation practices that will protect the confidentiality, integrity and availability of EPHI. The practices should reduce risk of unauthorized access and prevent loss, damage or modification of Polk County Government's EPHI.
- C. The Workstation Use Policy and Procedures apply to all workstations of Polk County Government, including portable and/or remote access workstations.
- D. The Information Technology Department will be responsible, but not limited to development, implementation and monitoring of workstation use policies and procedures.

**Procedures**

- A. The Information Technology Department will maintain an accurate inventory of workstations, their location and their supervision, including remote access workstations.
- B. The Information Technology Department or other designated person will be responsible for regulating access to workstations. See Access Authorization Policy and Procedures.
- C. The Information Technology Department will be responsible for monitoring compliance with terms and conditions of software licensing and copyright laws.

- D. The Information Technology Department, in coordination with Department Heads, will be responsible for developing and implementing appropriate training relating to workstation use.
- E. The Information Technology Department will implement procedures to monitor the computer system's operating environment.
1. All computer users will monitor their computer system's operating environment and report potential or real threats to the Information Technology Department.
  2. All workstations, if possible, will utilize UPS or surge suppressors in relation to electrical power outlets.
  3. All computer users will comply with the facility's disaster plan and take appropriate measures to protect EPHI.
- F. The Information Technology Department will be responsible for implementing any reasonable methods for maintaining the integrity of EPHI including the use of reasonable and appropriate anti-virus software. The software will be updated weekly, or as needed, to protect the integrity of EPHI.
- G. The Information Technology Department, as reasonable and appropriate, will implement and monitor a password control system on all workstations.
- H. The Information Technology Department, in coordination with Department Heads, as reasonable and appropriate, will regulate and monitor password or other authorized access means to ensure that access is only provided to authorized users.
1. To the extent possible, only unique user identification and log-in identification will provide access.
  2. Workforce members will not share passwords. Workforce members are not allowed to log-in using another workforce member's password or to allow another workforce member to log-in using their password.
  3. Workforce members are not allowed to enter data under another workforce member's password.
  4. Workforce members will not write down their password and leave the password in a publicly accessible location.
  5. Workforce members will make all reasonable attempts to assure that password entry is not observed in a manner that would allow unauthorized access.
  6. Three failed attempts at log-in will result in access denial and notification to the Information Technology Department.

**I. Information Input.**

1. Workforce members are responsible for the content of any data the member enters into the computer or transmits through or outside Polk County Government's system.

**J. Workstation Access and Use by Workforce Members.**

1. No employee may access any confidential information that is not required to be accessed as a component of their job description or that is authorized by his or her job description or other authorization.
2. No workforce member may download data from Polk County Government's system without explicit authorization from their supervisor, Department Head, or the Information Technology Department.
3. Workforce members will position their monitors to prevent unauthorized access to workstation screens.

**K. Backup.**

1. Each computer server will have a backup procedure that will be implemented in compliance with the Data Backup Plan Policy and Procedures.
2. Backup of server data, programs and computer systems will be performed on a regular basis in compliance with the Data Backup Plan Policy and Procedures.

**L. Log-off.**

1. Each computer workstation will be programmed with an automatic log-off function that will generate a password-protected screensaver when the computer has not received input for ten minutes.
2. Each user must either lock or log-off the system if they are leaving the computer workstation for more than ten minutes. Explicit reasons must be supplied to supervisor, Department Head, or the Information Technology Department, in order to work around this rule.

**M. Location and Positioning of Workstation Monitors.**

1. Workstation monitors will be located in as secure a location as possible.
2. Workstation monitors used infrequently will be located in a secure area or locked when not in use.
3. Workstation monitors will be positioned in a manner that the screens are not readily visible to unauthorized users.
4. Rooms that house workstations containing EPHI that can be locked, will be locked during non-business hours.

## N. Hard Copy Printouts.

1. The Information Technology Department may assist Department Heads, or supervisors in developing procedures for allowable printing of EPHI.
  2. Printed EPHI will be removed from public areas and secured as soon as reasonably possible after printing.
  3. Only users that need to print hard copies to perform their job will be allowed to print hard copies of confidential patient information.
- O. The Information Technology Department, in coordination with supervisors, or Department Heads will conduct periodic assessments of workstation location, positioning and use.

- P. The Information Technology Department, in coordination with the Privacy Officer and the Department of Employee Relations, will be responsible for documentation, maintenance and retention of information relating to Policy 602.Q. Workstation Use. The information will be retained for at least six years from the date of creation.

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## User Responsibilities

- A. Users will attend a Security Awareness and Training Program.
1. Users will sign a statement of understanding relating to requirements of the Security Rule, an agreement to abide by the security requirements and an agreement to protect the confidentiality of EPHI. The agreement to abide by the security requirements includes an obligation to use workstations appropriately. See Policy 601.P Confidentiality
  2. Users will be trained in relation to workstation use including the fact that workstations display protected health information and workforce members will be expected to use security precautions that protect the workstation and the workstation display from unauthorized use.

## Prohibited Workstation Practices

- A. The use of programs or connections to the Internet that may adversely affect confidentiality, integrity or availability of EPHI.

For example: Dissemination of computer viruses, participating in forwarded e-mail that is harassing or offensive, workstation use that is in violation of Polk County Government's privacy, security, or computer policies.

- B. Downloading or installing unapproved programs or applications.
- C. Unauthorized access to any workstation.
- D. Unauthorized use, dissemination or access to EPHI.
- E. Refusal to abide by the security requirements of Polk County Government.

**Definition:**

Workstation means an electronic computing device, for example, a laptop or desktop computer, or any other device that performs similar functions, and electronic media stored in its immediate environment. [45 CFR 164.304]

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**Polk County Wisconsin  
PHYSICAL SAFEGUARDS  
Workstation Security Policy and Procedures  
45 CFR §164.310 (c)  
REQUIRED**

**Policy 602.R**

**Effective Date: October 12, 2004**

**Revised Date: March 11, 2008**

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## Policy

- A. Polk County Government will implement physical safeguards for all workstations that access electronic protected health information (EPHI) to restrict access to authorized users.
- B. The Information Technology Department will be responsible for implementation of physical safeguards for all workstations that access EPHI to restrict access to authorized users.

## Procedures

- A. The Information Technology Department, in coordination with the Department Heads, will be responsible for implementing and monitoring physical safeguards for all workstations that access EPHI to prevent unauthorized access.
- B. Location.
  - 1. Workstations containing EPHI will be located in as secure an environment as possible.
- C. Viewing Procedures.
  - 1. Workstations and other equipment will be positioned in a manner that prevents, to the extent possible, unauthorized viewing of EPHI.
  - 2. Workstations and other equipment will be equipped, to the extent possible, with physical barriers that will restrict viewing to authorized users. (Physical barriers may include antiglare screens, privacy screens or covers that limit viewing.)
- D. Content Review.
  - 1. The content of displays may be reviewed to determine if limiting the content displayed, might better control information access.

E. Integrity Protection.

1. A virus detection system will be implemented including a process to maintain and update the detection system.

F. Screen Savers.

1. Screen savers, with password protection, will be installed and utilized with automatic log-offs..

G. Passwords and Log-ins.

1. Unique password and log-ins will be utilized to control access to the workstation
2. User identification and password authentication mechanisms will be implemented to access the system.

H. Protection of the EPHI Environment.

1. When appropriate and reasonable, surge protection will be utilized to protect EPHI from power fluctuations.

I. Other Physical Security Devices.

1. Devices will be used, as appropriate and reasonable, to secure the workstation.
2. Where appropriate and reasonable, restrict removable media to prevent unauthorized copying of EPHI.
3. Software controls that provide for read-only or restricted modification, copying or printing of EPHI.

- J. The Information Technology Department, in coordination with the Privacy Officer and the Department of Employee Relations, will be responsible for documenting, maintaining and retaining information relating to *Policy 602.Q Workstation Security*. The information will be retained for at least six years from the date of creation.

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**Note:** Workstation security is the process of implementing **physical** security controls and practices that will restrict unauthorized access to EPHI. This includes EPHI stored on computer workstations and other equipment such as printers and fax machines.

