

Polk County Government
ADMINISTRATIVE SAFEGUARDS
Information Access Management
Access Establishment, Authorization, and Termination
Policy and Procedures

Policy 603.E

Effective: March 15, 2005

Revision Date:

I. Policy

- A. Polk County Government will implement policies and procedures for the establishment, authorization, and termination of access to electronic protected health information (EPHI) when employment of a workforce member is added or ends.
- B. The Information Technology Department, in coordination with Department Heads or Division Supervisors, will be responsible for development, implementation, modification, monitoring and enforcement of policies and procedures relating to a user's right of access to EPHI.
- C. The policies and procedures will identify persons or classes of persons and their job descriptions in Polk County Government's workforce who need access to electronic protected health information to perform their job duties and the extent of EPHI that needs to be accessed for a person or class of persons to perform their job duties.

II. Procedures

- A. The Information Technology Department, in coordination with Department Heads or Division Supervisors, directly associated with EPHI, will identify the person or classes of persons comprising the workforce within the healthcare facility that need to access and / or process EPHI data. The persons or classes of persons will be documented on the *Workforce Access Determination Form* (F603.E-1). This policy and procedures follow the process of authorizing access, based on job functions. The points of access shall be identified and access is granted to the extent required for workforce members to perform assigned job functions.
 - 1. Based on the delineation of access by person or class of persons in the *Workforce Access Determination Form*, the Information Technology Department will develop access rules outlining the allowable access by workforce members to EPHI.

2. The Information Technology Department will also make reasonable efforts to limit access to comply with the Minimum Necessary standard for the persons or classes identified, and their need to access EPHI.
 - i. Unless otherwise allowable, no workforce member will authorize their own access.
 - ii. Unless otherwise allowable, no workforce member who authorizes access will establish access.

- B. Department Heads or Division Supervisors, directly associated with, and overseers of EPHI, will develop job descriptions for each person or class of persons in its workforce that need to have access to EPHI to perform their job duties. A copy of the job descriptions shall be reviewed semi-annually, or as needed in order to keep current with any / all changes in the duties of personnel with access to EPHI. A copy of the job descriptions shall be kept with each department and with the Privacy Office, and retained for a period of six years.

- C. The Information Technology Department, in coordination with Department Heads or Division Supervisors, directly associated with EPHI, will establish access privileges utilizing job titles and categories as outlined in the *Workforce Access Determination Form* (F603.E-1). Establishment of access may be initiated by:
 1. A written request from Department Heads or Division Supervisors, as it relates to a new workforce member or a change in employee status.
 2. A written request from another source based on a workforce member's need for accessing EPHI.

- D. Where reasonable, the Information Technology Department will be provided access to EPHI as is necessary to implement and monitor workforce access. Procedures for auditing access will be deemed a critical element of the access control process. The EPHI that is stored on Polk County Servers is considered reasonable, and shall be configured to allow the Information Technology Department access.

- E. The Information Technology Department, in coordination with Department Heads, or Division Supervisors over EPHI, will authorize access and supervise workforce access to EPHI. The Information Technology Department may delegate authorization of access and supervision of access to EPHI supervisory personnel.

- F. The Information Technology Department, in coordination with Department Heads or Division Supervisors, will be responsible for periodic review of established access and modification of access to EPHI, by its workforce.
 1. The Department Heads or Division Supervisors will perform the review semi-annually, or as deemed necessary.
 2. The process will include review of authorization of access, establishment of access, modification of access and termination of access.

- G. The Information Technology Department, in coordination with Department Heads or Division Supervisors, will be responsible for determining that access by a workforce member to EPHI will be terminated.
1. The determination may be made for a variety of reasons, such as termination of employment or job transfer; a workforce clearance process that indicates an individual may not be authorized such access, or an employment sanction process.
 2. The Department Heads or Division Supervisors will document that access by a workforce member has been terminated, and submit a copy to the Information Technology Department and Privacy Officer. See *Termination of Access Form* (F603.E-2).
- H. The Department Heads and Privacy Officer shall retain all documents and forms to document access, authorization, supervision and compliance with the state and federal security requirements. Information relating to access will be retained for a minimum of six years from the date of creation.