

BAY-ARENAC BEHAVIORAL HEALTH AUTHORITY POLICIES AND PROCEDURES MANUAL

Chapter: 9	Information Management		
Section: 3	Administrative Safeguards		
Topic: 7	Workforce Security – Access Clearance and Termination		
Page: 1 of 7	Supersedes Date: Pol: 4-21-05 Proc: 4-2-14, 6-27-13, 4-21-0	Approval Date: Pol: 8-15-13 Proc: 2-12-2020	<hr style="border: 0; border-top: 1px solid black;"/> <i>Board Chairperson Signature</i> <hr style="border: 0; border-top: 1px solid black;"/> <i>Chief Executive Officer Signature</i>
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Policy

It is the policy of Bay-Arenac Behavioral Health Authority (BABHA) to ensure the security of protected health information (PHI) and other confidential agency information by controlling access to information systems on a need-to-know basis and in accordance with appropriate confidentiality safeguards. Information systems will be accessible as appropriate and relevant in the provision of supports and services.

Purpose

This policy and procedure is established to ensure:

1. That only authorized workforce members have access to PHI and/or BABHA information systems;
2. That the level of access granted to information systems is appropriate to the person's job and his/her associated duties and responsibilities;
3. The security of PHI and BABHA's information systems from intentional or accidental breach by any workforce members no longer employed by or contracted with BABHA.

Education Applies to:

- All BABHA Staff
 Selected BABHA Staff, as follows:
 All Contracted Providers: Policy Only Policy and Procedure
 Selected Contracted Providers, as follows:
 Policy Only Policy and Procedure
 Other:

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Definitions

Health Information: Any information, whether oral or recorded in any form, that is created or received by BABHA and relates to an individual’s past, present, or future physical or mental health, or to the payment for such health care.

Individually Identifiable Health Information: Health information, including demographic information that identifies an individual or with respect to which there is a reasonable basis to believe the information can be used to identify the individual.

Information System: For purposes of this policy and procedure, information system refers to an interconnected set of information resources under the same direct management control that shares common functionality. A system normally includes hardware, software, information, data, and applications.

Protected Health Information (PHI): Individually identifiable health information transmitted by or maintained in an electronic media format (E PHI), or transmitted or maintained in any other form or medium, including oral and/or paper.

Workforce Member: Employees, volunteers, and other persons whose conduct, in the performance of work for a covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity. This includes full and part time employees, affiliates, associates, students, volunteers, and staff from third party entities who provide service to the covered entity.

Procedure

I. Workforce Member Access

1. When workforce members are hired as employees of BABHA, the appropriate supervisor must send an email to BABHA’s Information Systems (IS) Help Desk requesting access for the member to the BABHA information systems. If the request is urgent, a telephone call from the supervisor may be used instead.

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2. For workforce members employed by agencies other than BABHA, the responsible BABHA manager or director must send an email to the Help Desk requesting access for the member to the BABHA information systems. If the request is urgent, a telephone call from the manager or director may be used instead. The manager or director can give either blanket or individual approval to the agencies and/or their workforce members
3. The supervisor’s email/phone call should request a computer sign-on, addition to appropriate distribution lists, and only the minimum necessary level of access required for the workforce member to perform his/her job functions. The request must clearly identify the requested level of access, the effective date, and if only temporary access is required, must include the expected expiration date of access. (See Related Form - Supervisor Checklist/New Hire/Termination).
4. An email from the immediate supervisor to the Help Desk must also be submitted whenever a workforce member experiences a change in his/her role such that the job title, department, duties, or responsibilities also change, resulting in modification to workforce members’ access. Requests for, and modifications of, access should always be at the minimum level necessary for workforce members to perform their job functions.
5. The Help Desk will start all requests for access and log both the planned access end dates and actual access end dates. Any concerns regarding a request and/or level of access are referred to BABHA’s Security Officer for follow up.
6. The BABHA Corporate Compliance Officer (CCO), or designee, and/or the Security Officer, will periodically and regularly assess workforce members’ access to PHI. Any discoverable discrepancies or unauthorized changes to access are communicated to the Help Desk which will log the discrepancies and/or changes for follow up.
7. Auditing capability is activated in BABHA’s primary electronic medical record (EMR) application and the CCO, or designee, will review subsequent auditing reports.

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8. Any other request for access, or modification to access, not defined above needs to be directed to the CCO, or designee.

II. System Administrator Special Access

1. If workforce members, other than information technology personnel, are designated as system administrators for software applications and the technology network, the Help Desk will be kept informed of their names and responsibilities.
2. The Help Desk will check with the appropriate BABHA manager or supervisor if access to software applications and the technology network is requested by a workforce member.
3. Workforce members with special administrative access should use only the minimally necessary access required to complete their job duties.
4. System administrators will access information systems using their unique individual ID and password (see BABHA Policy and Procedure, C09-S03-T15 – Security Awareness – Password Management) and using only BABHA approved workstations or devices (see BABHA Policies and Procedures, C09-S04-T05 – Workstation Use and Security and C09-S04-T07 – Electronic Devices and Media Controls).

III. Access Termination

1. BABHA’s Human Resource personnel will notify the Help Desk of any terminated workforce member. The workforce member’s access to BABHA’s information systems will be deactivated based on the notification date provided.
2. The supervisor of any terminated workforce member will contact the Help Desk regarding his/her removal from all distribution lists and any P drive assigned to them, if applicable. Deactivation will be based on the notification date provided (see Related Form - Supervisor Checklist/New Hire/Termination).
3. The director responsible for overseeing the work of auditors, consultants and/or vendors will notify the Help Desk as soon as the need for access rights has ended.

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Access to any BABHA information system will be deactivated based on the notification date provided.

4. All contracted providers are responsible for notifying BABHA’s Help Desk when one of their workforce members resigns or is terminated. Access to any BABHA information system will be deactivated based on the notification date provided.

IV. Additional Clearance Activities

1. At times, certain consumer records must be protected from being accessed due to extenuating circumstances such as, a family relationship between a consumer and a staff member, a consumer who is a public figure in the community, a high profile public incident that involves a consumer, etc. Permissions to access these records will be restricted to identified workforce members.
2. If supervisors or other workforce members, based on their roles/responsibilities, are aware of the need to have access restrictions put on consumer records, they must notify the CCO and provide the consumers’ ID numbers.
3. The CCO will arrange for the records to be locked down on the electronic health record system and have the IS department set permissions accordingly. Workforce members who are restricted from seeing the record(s) will be isolated out.
4. The BABHA Security Officer, or designee, is responsible for managing and tracking the user IDs of new, existing, and terminated workforce members. The Security Officer, or designee, will follow up on access rights that have been granted or revoked and ensure user IDs are deleted from the information systems for terminated workforce members.

Attachments

N/A

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Related Forms

Supervisor Checklist/New Hire/Termination

Related Materials

BABHA Policies and Procedures

1. C09-S04-T05 – Workstation Use and Security
2. C09-S03-T15 – Security Awareness – Password Management
3. C09-S04-T07 – Electronic Devices and Media Controls – Movement, Re-use, Data back-up and Disposal



References/Legal Authority

Administrative Safeguards - HIPAA Section 164.308(a)(3)

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SUBMISSION FORM				
AUTHOR/ REVIEWER	APPROVING BODY/COMMITTEE/ SUPERVISOR	APPROVAL /REVIEW DATE	ACTION (Deletion, New, No Changes, Replacement or Revision)	REASON FOR ACTION - If replacement list policy to be replaced
J. Pinter M. Bartlett M. Wolber	CCP/SLT	06/27/13	Revision	Revised to reflect HIPAA compliance and updated to current practices. Also incorporates previous P/Ps C09-S03-T08 & T10
M. Wolber	J. Pinter	04/02/14	Revision	Revised to include information on locked down records
B. Kish	J. Pinter	02/10/17	Revision	Triennial Review-Corrected referenced P/P label
B. Kish	J. Pinter	02/12/20	Revision	Triennial Review-Removed old reference to BABHA being a technology provider
J. Bellinger	Karen Amon	03/10/2023	No Changes	Triennial Review