

PURPOSE

The purpose is to establish the policy and procedure for the Michigan Department of Health and Human Services (MDHHS) to implement procedures for the authorization and supervision of workforce members who have access to sensitive information, including Electronic Protected Health Information (ePHI), and to ensure that all workforce members have the appropriate access to sensitive information.

REVISION HISTORY

Reviewed: 01/01/2024.

Next Review: 01/01/2025.

DEFINITIONS

ePHI is the acronym for Electronic Protected Health Information. It is Protected Health Information that is transmitted or maintained in electronic form.

PHI is an acronym for Protected Health Information. It is information that can identify a person and contains health related data pertaining to that person.

Workforce Member means 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.

POLICY

MDHHS shall reasonably ensure that workforce members have the appropriate authorized supervision and access to sensitive or ePHI as required by their work function.

PROCEDURE

Supervisor/Manager Responsibility

- Grant workforce members authority to only access information systems that are appropriate with their defined work function.
- Train and supervise workforce members who do not have access to sensitive information or ePHI and who are working in locations where sensitive information or PHI may be accessed.

- Implemented appropriate measures to ensure custodial staff (including any supporting contractors) do not have access to sensitive information or PHI.

Workforce Member Responsibility

Obtain documented authority from the appropriate manager to only access information systems that are appropriate with their defined work function.

Security Officer Responsibility

- Regularly review workforce member access to determine if workforce members and managers are in compliance.
- Ensure that custodial staff management are aware of HIPAA regulations.

REFERENCES

45 CFR 164.308(a)(3)

CONTACT

For more information regarding this policy, contact the MDHHS Compliance and Data Governance Bureau at MDHHSPrivacySecurity@michigan.gov.