

PURPOSE

The purpose is to establish the policy and procedure for the Michigan Department of Health and Human Services (MDHHS) to control and validate a workforce member's access to facilities based on their role or function, including visitor control and control of access to software programs for testing and revision.

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 the 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.

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." (164.304) Thus PDAs, tablet computers and other portable/wireless devices are included. (Department of Health and Human Services noted specifically in its Final Rule commentary that the standards are not to be interpreted as limited to "fixed location devices" Final Rule, p.22).

POLICY

It is the policy of the MDHHS to authorize access based on the role of the workforce member (based on their job function) and shall specify what authorized workforce members may do with the ePHI that they work with, such as create, read, modify and delete.

PROCEDURE

The MDHHS security officer shall determine who may authorize access to ePHI, for what purposes access to ePHI may be authorized and the procedure for approving the access authorization.

Authorization criteria shall include required levels of training. Authorization criteria shall be reevaluated periodically. Renewal and change of access authorization may require a full reevaluation of access needs and additionally, may require continued or additional training.

Document and maintain authorizations.

Determine how and when to modify or cancel authorization and shall document those determinations.

REFERENCES

[45 CFR 164.308\(a\)\(1\)](#)

[MDHHS 06.8.D.7 PHI Use and Disclosure Policy](#)

[MDHHS 06.8.D.7.2 PHI Use and Disclosure Procedure](#)

CONTACT

For more information regarding this Policy, contact the MDHHS Security Officer MDHHSPrivacySecurity@michigan.gov.