
PURPOSE

The purpose is to establish the policy and procedure for the Michigan Department of Health and Human Services (MDHHS) to ensure that the MDHHS has emergency access procedures to protect Electronic Protected Health Information (ePHI) and other confidential information in the event of an emergency.

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.

POLICY

It is the policy of the MDHHS to ensure that directions containing criteria for authorization and listing user names shall be established for authorizing access to restricted confidential information based on the business needs and job function of the workforce member who requires the emergency access. This includes access to the physical environment and to the contingency systems where emergency access is provided. Criteria should include identifying the workforce member, why the workforce member requires access to a particular system and verification of that information.

PROCEDURE**Division Director or Section Supervisor/Manager/Department of Technology, Management and Budget (DTMB)**

Access logs shall be maintained for the duration of emergency access in order to monitor which workforce members have access to ePHI or other confidential information. An Emergency Access log should contain:

- Date and time access was granted
- Workforce member name and unique user ID
- Access rights granted (system, data)
- Nature of emergency
- Name of person authorizing emergency access

REFERENCES

[45 CFR 164.312\(a\)\(1\)](#)

CONTACT

For additional information concerning this policy and procedure, contact the MDHHS Security Officer at MDHHSPrivacySecurity@michigan.gov.