

ADAMHS BOARD FOR MONTGOMERY COUNTY	BP # 528	
TITLE: Workforce Authorization, Supervision and Clearance	SUBJECT HIPAA SECURITY	
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PURPOSE: To ensure that the Board implements procedures to determine that the access of a workforce member to electronic-protected health information is appropriate.

POLICY:

1. Security responsibilities and the extent and nature of a workforce members' access to electronic protected health information (EPHI) must be identified when defining a Board workforce position.
2. All members of the ADAMHS Board for Montgomery County must sign an agreement stating their commitment to and understanding of their responsibility for the protection of the confidentiality, integrity, and availability of EPHI.
3. Board workforce members shall only be authorized to have access to the minimum amount of EPHI, or the locations where it resides, that is necessary for the individual to competently perform the duties and responsibilities of their position.
4. New employees shall be trained with respect to privacy and security policies and procedures prior to having access to PHI.
5. Workers who are promoted or transferred and have substantially greater responsibility for or access to PHI shall be trained with respect to privacy and security policies and procedures, as is appropriate to their duties.
6. Procedures are in place to protect EPHI and other electronic data upon an employee's separation from employment at the ADAMHS Board for Montgomery County.

REFERENCES:

HIPAA Final Security Rule, 45 CFR Parts 160, 162, and 164, Department of Health and Human Services, <http://www.cms.hhs.gov/hipaa/hipaa2/regulations/security/default.asp>, February 20, 2003. §§ 164.308(a)(3)(ii)(A) and (B).

"Information Security: An Introductory Resource Guide for Implementing the HIPAA Security Rule", National Institute for Standards and Technology (NIST), <http://csrc.nist.gov/publications/drafts/DRAFT-sp800-66.pdf>, May 2004.

"CMS Information Systems Security Policy, Standards and Guidelines Handbook", Centers for Medicare and Medicaid Services, <http://www.cms.hhs.gov/it/security/docs/handbook.pdf>, July 2004.