

URI HIPAA SECURITY POLICY – IMPLEMENTATION SPECIFICATION #3B

Title:	WORKFORCE CLEARANCE PROCEDURE	Purpose & Background	See Memo Entitled "HIPAA at URI: Introduction to HIPAA and an Overview of HIPAA Implementation at URI" available online at the URI HIPAA website
Originator (Responsible Department/ Unit):	URI HIPAA Compliance Oversight Committee	Effective Date:	05/22/2018
Applies to:	All URI Departments and Units Designated as HIPAA "Covered Components" and "Business Associate Components"	Revised Date(s):	

Purpose:

This implementation specification reflects URI's commitment to ensure that all workforce members have appropriate authorization to access URI information systems containing EPHI.

Specification:

The background of all URI Covered Entity workforce members who will have access to EPHI must be adequately reviewed during the hiring process.

URI Covered Entities must identify the level of access required by all URI workforce members who access URI information systems containing EPHI.

When defining a new organizational position, the URI Covered Entity must identify and define both the security responsibilities of and level of supervision required for the position.

Procedure:

The following implementation specifications and safeguards must be implemented to satisfy the requirements of this specification:

1. URI Covered Entities must identify the appropriate level of access required by all URI workforce members who access URI information systems containing EPHI. Such access must be formally documented and securely maintained.
2. The background of all URI workforce members must be adequately reviewed during the hiring process. Verification checks will include, criminal background checks, and any other checks (e.g. character reference checks) as deemed appropriate for the position).
3. When defining a position, the URI Covered Entity and the hiring manager must identify the security responsibilities and supervision required for the position. Security responsibilities include general responsibilities for implementing or maintaining security, as well as any specific responsibilities for the protection of the confidentiality, integrity, or availability of URI information systems or processes.

HIPAA REGULATORY REFERENCE: 45 CFR 164.308(a)(3)(ii)(B)

HIPAA SECURITY REGULATION IMPLEMENTATION SPECIFICATION LANGUAGE: *“Implement procedures to determine that the access of a workforce member to EPHI is appropriate.”*