

## ASSIGNMENT OF ACCESS PRIVILEGES PROCEDURE

1. An access profile committee will be comprised of the following, or their designees:
  - Director of Information Systems (chair)
  - Designated Privacy Official or Designee(s)
  - Designated Security Official
  - Director of Medical Records
  - Director of Human Resources
  - Experienced provider of health care (MD, PA-C, nurse practitioner, RN)
  - Regional manager or satellite site manager
  
2. The access profile committee will
  - Review job descriptions and assign them to job classes, based on the PHI required to accomplish the job efficiently.
  - Assign PHI data elements to categories
  - Assign categories of PHI to job categories, to form access profiles
  - Review access profiles annually, or when requested
  - Modify access profiles as needed
  - Establish emergency procedures for access or terminating access privileges
  - Establish procedures for termination of access privileges
  - Have new access profiles and job classifications reviewed by managers to whom the affected jobs report, and make such changes as are warranted to satisfy the two principles of quality and efficient care and patient privacy.
  
3. The Director of Human Resources will incorporate each job's access profile into the job description and into training materials, to assure that each member of the workforce is aware of what information he or she may see and use, and which he or she is not permitted to see or use.
  
4. The Director of Information Systems will assure that members of the workforce have electronic access to PHI that is consistent with their access profiles. Records of how this is achieved will be retained for as long as a given access profile is in effect, until the date it is supplanted by a revised profile, plus six years or longer if required by state law or regulation. Records will be maintained by the Access Profile Committee.
  
5. Job classes, PHI classification, access profile composition, and access profile assignments will be recorded. The record will include brief descriptions of the

rationale behind classification and assignment decisions. Each of these records will be kept for six years or longer if required by state law or regulation after the date it is superseded by a revision.

6. In situations where a member of the workforce requires additional access based upon work assignments, that person's supervisor may submit a request for modification of that employee's access profile. All requests should include evidence of additional responsibilities and training to support the need for modified access.
7. The access profile committee will keep minutes. Minutes will be retained for six years or longer if required by state law or regulation, to document the process and rationale for the access decisions they make.

**RATIONALE:**

BHHF may use role-based access control, while recognizing that, in some circumstances, a person's job may be so unique as to constitute a role in its own right.

Job and data classification is entrusted to a committee representative of the principal areas of expertise necessary to achieve the objective of this classification system.

Two principles guide the development of access profiles: the quality and efficiency of patient care, and the privacy and security of patient information. For instances, a nurse may be granted access to the entire medical record of patients on his or her floor; but may not have access to records of patients on other floors.

The same access profiles are used to develop electronic access controls, and training and job standards, to guide access to any PHI in whatever medium: paper, voice, electronic, or other medium.

**REFERENCE:**

45 CFR § 164.514(d)(2)

See also:

MINIMUM NECESSARY RULE

ROUTINE AND RECURRING REQUESTS FOR AND DISCLOSURES OF  
PROTECTED HEALTH INFORMATION

Effective Date: 4/14/03  
Revised Dates:



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Jerome E. Lovrien, Commissioner, Bureau for Behavioral Health and Health Facilities