



521 4th Street Havre Montana 59501 • Phone: 406-395-4305 • Fax: 406-395-5643 • www.bullhook.com

Policy 5004:

Access Controls for Protected Health Information Policy

Purpose:

The purpose of this policy is to define how to access to Bullhook Community Health Center (BCHC) confidential or internal use information, Protected Health Information (PHI), BCHC information systems, facilities, devices and networks will be limited to those individuals who need access in order to perform their job duties. Any such access shall be subject to reasonable security safeguards.

Scope:

This policy applies to all BCHC workforce members (Employees, interns, students, consultants, contractors, subcontractors), and others who may have access to BCHC confidential or internal use information and PHI, including information that is used for compliance activities, product development, Help Desk, data aggregation, claims processing, BCHC member support, and quality improvement.

Policy:

It is the policy of BCHC to protect the confidentiality, integrity and availability of patient information belonging to our member's patients. It is also BCHC's policy to protect confidential business information and BCHC property. BCHC workforce members and any other individuals that have an appropriate need to access BCHC information, information systems, facilities, devices or networks in connection with their job duties and functions will be granted appropriate access.

It is also the policy of BCHC to utilize Active Directory and/or Application specific Security Groups to manage access to systems containing PHI, utilizing the principle of least privilege in assigning rights and permissions to systems. Administrators will add access as authorized by the manager/supervisor on the employee BCHC request defined through the HR policy.

Review of employee access and assignment will be conducted semi-annually.

Human Resources Notification to Systems Team:



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Workforce member's manager may initiate the systems and network access process. The Human Resources Team (HR) will send request for information systems and telephone access request to the Super Users for completion. Access and equipment will be granted based on the role the individual will be performing at BCHC and their need to know the information and that access is based on the manager's request. For example, a person working at the Reception Desk would have different access to information systems than an Administrative Assistant.

Access Controls:

Access to information, information systems, processes, facilities, devices or networks is subject to BCHC policies relating to confidentiality, integrity and availability of BCHC information. Any such access to BCHC information will be consistent with State and Federal laws, rules, regulations, accreditation standards and other BCHC policies. Workforce members and any other individuals that are permitted this access shall take reasonable precautions to prevent the disclosure of such information, unauthorized use of systems, processes, facilities, devices and networks.

All users will be responsible to access only those systems and devices that have been authorized for their use. Any use of BCHC information and or systems, facilities, networks or devices not specifically authorized by BCHC is prohibited. Employees must lock their work stations when they walk away.

Termination of Employment:

Upon termination of employment, internship or contract, the manager of the workforce member will notify Super Users and CEO of the termination. This notification should be in writing. The Super User will remove telephone and information system access for the individual and they will deactivate their proximity card (key card). BCHC laptops, proximity cards, keys, company owned cell/smart phones, iPads, telephones, etc. must be returned to the individual's manager on the last day of employment.

Data Center Access:

Access to the BCHC data center and servers will be granted by BCHC Executive Staff. Access to the data center is allowed by the use of a key, and entrance being granted by Executive Staff who requires visitor sign-in.

Reporting improper use of Information, Information Systems:



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Workforce members and any other individual with access to BCHC information or information systems, facilities, devices and networks are required to immediately notify a BCHC Compliancy Officer and the HR Director in the event that they become aware that BCHC information, information systems, facilities or devices or networks are being used improperly, in an unauthorized manner, and or if that use has resulted in an unauthorized or improper disclose of confidential information. Please see the Notification of Breach of Unsecured Protected Health Information policy for additional information pertaining to unauthorized or improper disclosures of PHI.

 _____ Date: 8-21-15

CHIEF EXECUTIVE OFFICER

 _____ Date: 8-10-15

CHAIR, BOARD OF DIRECTORS

Date first adopted	6/24/2015 QI Committee	
Date revised		
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