

Thomas. O Forslund, Director

Governor Matthew H. Mead

Policy Title:	Workforce Clearance
Policy Number:	S-003b
Effective Date:	July 15, 2013
Approval:	Thomas O. Forslund, Director 7/15/13 Date

Purpose:

This policy establishes Wyoming Department of Health's (WDH) commitment to ensure access to information systems containing protected health information (PHI) is only available to authorized WDH workforce members.

Scope:

This policy applies to all WDH workforce members.

Policy:

- 1. Verifications/reference checks shall be conducted for each WDH workforce member both during the hiring process and throughout the workforce member's tenure with WDH. The hiring team, in conjunction with the WDH Human Resources Office shall complete verifications prior to an employment offer, as appropriate for the position.
- 2. Breadth of verification. The type and number of verification checks conducted shall be based on the workforce member's degree of access to WDH information systems containing PHI, ability to modify information, and level of influence or authority over other workforce members.
- **3. Identification of required access.** When developing a job classification questionnaire, the hiring manager shall identify the:
 - a. Type of PHI needed to perform the job (e.g., entire medical record);
 - b. Necessary system access (e.g., Gateway);
 - c. Necessary level of access (e.g., read only); and
 - d. Job purpose for the access (e.g., treatment, oversight).
- **4.** Third party services. WDH divisions/programs/facilities that retain the services of third parties, volunteers, or contract staff (e.g., temps, interns) shall ensure such persons adhere to WDH policies.
- **5. Acknowledgement of training.** All WDH workforce members who require access to WDH information systems containing PHI shall sign a WDH Form F-002; Acknowledgement of Training within thirty (30) days of hire and regularly thereafter.
- 6. Assignment of functional categories. All WDH workforce members shall sign a WDH Form F-028; Assignment of Functional Categories acknowledging the functional categories of information they may access and their responsibility to protect the systems and information contained within.

Contacts:

De Anna Greene, CIPP/US, CIPP/G, CIPP/IT, WDH Privacy/Compliance Officer, (307) 777-8664 Tate Nuckols, JD, WDH Security Officer, (307) 777-2438

Forms:

F-002; Acknowledgement of Training F-028; Acknowledgement of Functional Categories

Policies:

WDH Policy 248

References:

45 CFR § 164.308(a)(3) Wyo. Stat. Ann. § 7-19-201

Training: