

| Title: Temporary Staff Access | Policy #: SEC-12.05 |
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| Category: HIPAA Compliance | Authority: 45 CFR § 164.312(a)(1) |
| | HIPAA SECTION: |
| Standard: Access Control | Responsibility: Health Care Components |
| Effective Date: 09/01/2012 | Page 1 of 2 |
| Approved By: OSU Legal Counsel | Revised: 7/1/2013 |

PURPOSE:

Identify methods of ensuring temporary staff and visiting medical students have the minimum necessary but appropriate level of access to OSU PHI, and ensure the methods used are auditable.

POLICY:

Temporary staff and/or Med Students in the clinic system who do not have their own O-key account may have access through departmentally sponsored temporary O-Key accounts.

PROCEDURE:

- 1. Each clinic/department that wishes to utilize temporary staff for various reasons may obtain temporary O-Key Service accounts from the I.T. Department.
- 2. Upon activation of the service accounts, the requesting Department may utilize ID cards for access control. Many of the OSU clinic locations utilize locked doors with card reader technology that requires an individual to swipe the card through the reader to open the door. The requesting Department is required to keep an electronic, auditable log of ALL temporary staff and to which account/card they have been assigned while at OSU.
- 3. The requesting Department may also request access to certain computer software programs that contain PHI. These programs the Electronic Health Record, Practice Management System and Document Imaging systems, the three main systems for clinical records. Upon approval from the HIPAA Compliance Office, and after account creation by IT, it is the requesting Department's responsibility to request deactivation of temporary staff when employment/temp status ends.
- 4. If the requesting Department utilizes the RFID card technology to access the various software systems, the temporary staff member is NOT eligible to use an RFID card.
- 5. If a temporary staff member gets re-assigned to a different department, access must be terminated under the current credentials, and the new department is to start the request process over.
- 6. The audit logs each department are required to keep are to be made available to IT, Internal Audits, and the HIPAA Compliance Office.
- 7. New Employees who have yet to receive their personal Okey are not eligible for a temporary service account. They must wait until their personal Okey account is created to get access to the various systems.



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DEFINITIONS:

- Temporary Employee: Any employee who is hired, either through the university or through an agency, for a short term basis, that by default does not receive an O-key account as terms of employment. Volunteers are required to sign the Volunteer Statement of Understanding through Human Resources.
- RFID: Radio Frequency Identification. To access some of the computer terminals at OSU, one may utilize an ID card with an RFID chip embedded in the card. This automatically logs the user in under the information stored within the chip, bypassing typing in login credentials.
- Med Students: Medical degree seeking students from other schools and Universities that do not have and will not get an Okey account because of the short length of stay in our system.