**POLICY & PROCEDURES**

***Defining the Overall Approach toward Meeting a Requirement***

### **Workforce Clearance §164.308(a)(3)(ii)(B)**

### **Effective Date:** <Month Day, Year>

### **Policy Number:** <If applicable> **Rev.** 0

**Policy:** The background of all of our workforce members must be adequately reviewed during the hiring process. The type and number of verification checks conducted must be based on the employee's probable access to our information systems containing ePHI and their expected ability to modify or change such ePHI.

**Procedures:** Our hiring manager conducts background and verification checks, if necessary, depending on ePHI access privileges, of all prospective workforce members. We verify previous employment and check references given.

**Details:** The workforce clearance procedures include but are not limited to:

* The background of all workforce members is adequately reviewed during the hiring process, and verification checks are made, as appropriate. Verification checks include, but are not limited to:
* Professional references
* Professional license validation
* Criminal background check
* The type and number of verification checks conducted are based on the workforce member’s probable access to information systems containing ePHI and their expected ability to modify or change such ePHI.
* The hiring supervisor assigns each workforce member a level of access to information systems containing ePHI based upon job function.
* All workforce members who access information systems containing ePHI will sign a confidentiality agreement.
* Documentation (e.g. on-boarding checklist, job application, resume, background check, credential verification report, confidentiality agreement) of the practices in place will be retained as evidence of compliance.

**Location of supporting documentation:** If so, identify the document and location it is stored here.

## REVISION HISTORY

| Revision | Date | Initiator | Nature of Change |
| --- | --- | --- | --- |
| 0 |  |  | Initial draft |
| 1 |  |  |  |