1) Initial Grant of EPHI Access and Ongoing Supervision of EPHI Access

Supervisor (or proper departmental authority) role: A workforce member's supervisor determines the specific system and data repository access required for the workforce member to perform assigned duties.   The supervisor's role is to:

- Make a request using the support web interface (or email) for each account access an employee needs (See RO Information Access Management Procedure (#4)).
- Request accounts for only workforce members who require EPHI access
- Request accounts for only the minimum level of access required
- Retain a copy of the original request for account access

*Access to any system or EPHI repository in Radiation Oncology does not require an authorization by HR.

No unauthorized access to EPHI will be allowed, and all employees are subject to the WU Code of Conduct (http://codeofconduct.wustl.edu/) as it relates to the appropriate use of EPHI.
When a workforce member is not an employee of WU, the WU supervisor or sponsor is responsible for the appropriate use of WU EPHI by the workforce member.

2) Assessment of Appropriateness of Access to Systems manipulating EPHI

Each RO system manager should perform an initial review for each system that uses EPHI to insure that the current user list as well as the level of access for each user is appropriate. Each RO system manager should perform a subsequent review at least annually.

Each supervisor should advise the appropriate system manager when a workforce member's role changes so that the workforce member's access level can be adjusted promptly.

3) Termination of Access to EPHI

Employees are tracked through the Manager of Administrative Services. Visitors (or non-employee workforce members) are tracked through supervisor input to the Privacy Liaison. When an employee departs from the Radiation Oncology workforce (including transfer to another WU department), the Manager of the Administrative services notifes system managers. However, when a non-employee workforce member departs from the Radiation Oncology workforce, the Privacy Liaison must send a written (or electronic) request to revoke that employee's access to the department's systems and repositories manipulating EPHI to Oncology Information Systems (http://rocweb/oissupport) and other systems managers, as early as possible, stating the date of revocation of access. (See #4. RO Information Access Management Procedure further detail about termination