

AGENCY OF HUMAN SERVICES

# Personnel Security Procedures

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This document describes the Personnel Security control PS-2, PS-3, PS-4, PS-5, PS-6, PS-7, PS-8 in fulfillment of NIST 800-53, IRS 1075 and MARS-E

## Revision History

<b>Date</b>	<b>Version</b>	<b>Description</b>	<b>Author</b>
9/1/1992	1.0	Created Document	
11/12/2013	3.0	Adapted format to VHC standards document and to MARS-E	Jack Green

## Table of Contents

INTRODUCTION.....	4
SCOPE .....	4
PURPOSE .....	4
PROCEDURE .....	4
IMPORTANT INFORMATION .....	8



## **INTRODUCTION**

Vermont Health Connect (VHC) has established an information security and privacy program which satisfies the requirements for an Information Security Program as specified in the Centers for Medicare and Medicaid Services (CMS) Minimum Acceptable Risk Standards for Exchanges (MARS-E) requirements.

## **SCOPE**

This procedure applies to the equipment, technology, and data for which VHC is responsible and all individuals who come in contact with the systems either logically or physically. Contracts and other agreements with third parties involving VHC information assets include compliance with VHC's policy and procedure. Implementation efforts regarding personnel vetting, authorization, and training will be done in coordination with and support of responsible human resource and personnel staff.

## **PURPOSE**

The purpose of these procedures is to facilitate the implementation of Vermont Health Connect's security procedures for its personnel.

## **PROCEDURE**

### **Personnel Screening/Hiring**

All Connector's employee must go through Personnel Screening within the constraints of the VSEA union contract. The Connector is responsible for ensuring that all submitted information by potential VHC's employees are both accurate and consistent with requirements specified in Appendix A. These attributes may include:

- Surname (maiden name) and given name(s).
- Date of birth.
- Address for the past five years.
- Educational and professional qualifications or trade certification or accreditation.
- Employment history for the past five years.

- Performance reliability and personal character by contacting previous employers and identified references for the past five years.

- **Identity**

- The Connector's HR function is directly responsible for verifying the background / identity of an applicant by using one of the following official documents:
  - i. Valid passport.
  - ii. Valid driver's license that has been issued in the country of employment, which includes a laminated photograph.
  - iii. Military identification.
  - iv. Valid work permit / visa issued by the country of employment.
  - v. Other official identification issued by a country, province or state.

- **Education / Professional Qualifications**

Educational or professional qualifications are verified by obtaining copies of official transcripts, diplomas, certificates from educational/professional institutions and/or originals of professional certification from municipal / provincial / federal licensing bodies, associations or institutions.

- **Employment History**

Employment history for the last five years must be verified by contacting previous employers to ascertain dates of employment, performance and reason for leaving employment. A minimum of one such verification is required.

- **Employment References**

The Connector's HR function must verify employment references by contacting references provided by the applicant for the last five years. A minimum of one of such verifications is required.

## **Personnel Termination**

Personnel Termination shall be timely communicated to all appropriate areas within the Connector to deactivate access rights that are no longer required. HR will be responsible for communicating any personnel termination information within 1 day of termination. The following activities need to occur for any personnel termination:

- Keys (building, office, desk, file cabinets, safes, equipment, vehicle, etc)

- Security/ID Badge
- State Credit Cards, including Purchasing Card
- Parking Permit
- Computer equipment (such as laptops, portable printers, etc)
- Handheld devices (such as BlackBerry, Palm Pilot, portable storage devices, etc)
- Pager
- Cell Phone
- Final Employee Timesheet and Expense Account submitted
- Outstanding Travel or Salary Advances
- Time Study
- Cancel IT/database account access
- Reprogram voice mail code
- Cancel long distance calling code

The following IT activities need to occur for any personnel termination:

- Change or cancel all passwords, codes, user IDs, and locks.
- Disable user IDs for extended absences (60 days).
- Update access control lists, mailing lists, etc.
- Collect all keys, badges, and similar items.
- Reconcile any financial accounts over which the employee had control.
- Ensure electronic records are accessible and properly secured, filed, or appropriately disposed.

### **Personnel Transfer**

Any Personnel Transfer that requires changes in access rights shall be timely communicated to all appropriate areas within the Connector to deactivate access rights that are no longer required. HR will be responsible for communicating any personnel transfers within 3 days. The following activities may need to occur for any personnel termination:

- Keys (building, office, desk, file cabinets, safes, equipment, vehicle, etc)
- Security/ID Badge
- State Credit Cards, including Purchasing Card
- Parking Permit
- Computer equipment (such as laptops, portable printers, etc)
- Handheld devices (such as BlackBerry, Palm Pilot, portable storage devices, etc)

- Pager
- Cell Phone
- Final Employee Timesheet and Expense Account submitted
- Outstanding Travel or Salary Advances
- Time Study
- Cancel IT/database account access
- Reprogram voice mail code
- Cancel long distance calling code

### **Third-Party Personnel Security**

The third party must adhere to a non-disclosure agreement (NDA) prior to having access to any sensitive CGI or client information. In some circumstances, the NDA may be signed before final approval of the contract.

The Security and Privacy Officer shall ensure that contractors and other third-party service providers are subject to the same personnel screening requirements as Connector Staff.

A risk assessment may be conducted to assess the security of the third party's infrastructures, premises, policies, standards and procedures in relation with its contracted functions (outsourcing included). The risk assessment may recommend appropriate security controls.

Statements regarding disciplinary actions shall be communicated to all employees and third parties if found non-compliant with Personnel Security policies.

### **Personnel Sanctions**

1. Examples of Unacceptable Conduct
  - Violation of any workplace policies, rules, or procedures.
  - Insubordination.
  - Failure to perform tasks or assignments and/or failure to follow instructions, or willful slowdown.
  - Failure to observe safety rules.
  - Neglect, carelessness, or mischief which results in bodily injury or loss, damage, or destruction of company property.
  - Failure to report accidents, injuries, and/or property damage that occur during work hours and/or at the workplace.

- Failure or refusal to cooperate, or providing false or misleading statements or testimony, in any The Connector investigation.

## **2. Sanctions Due to Failure to Adhere to Standard Rules of Conduct**

Violation of VHC policies may result in administrative and/or disciplinary action including verbal/written reprimand, restrictions on network access, suspension, investigation leading to civil or criminal charges, dismissal or termination of contract.

### **IMPORTANT INFORMATION**

These procedures can be found at <http://dvha-intra.ahs.state.vt.us/policies-protocols/InfoSec>

Appendix A - AHS Background Checks & Applicable Job Groups

AHS Background Checks & Applicable Job Groups

<i>Type of Background Check</i>	<i>Authority</i>	<i>Applicable To:</i>	<i>When:</i>
FBI Security Clearance	Federal Select Agent Rule	Designated positions at the Health Lab	Upon conditional offer of employment Re-checks as mandated by federal law/rule
FBI National Record Check	42 USCA 5119 a & c	Any position where the candidate has been a VT resident for less than 5 years. Any position where the job role is covered by federal law/rule regarding security of sensitive data – currently DOS and DAII.	Upon conditional offer of employment Re-checks as mandated by federal law/rule
Vermont Criminal Record Check	20 VSA Sec 2056a (criminal justice agencies) and 2056c (employers) – applies to applicants 33 VSA Sec 6914 – applies to applicants and current employees providing developmental or mental health services to vulnerable adults	Any position being filled by a new hire. Does not currently apply to existing State employees and RIF rehires.	Upon conditional offer of employment
Adult Abuse Registry	33 VSA Sect 6911	Any position being filled by a new incumbent where the duties involve providing care, custody, treatment, supervision, or transportation of children or vulnerable adults:  Applicable DCF job classes <ul style="list-style-type: none"> <li>• All Woodside positions</li> <li>• Social Worker series (including supervisor)</li> <li>• Reach Up and Benefits Program series (incl supv) <ul style="list-style-type: none"> <li>◦ <i>Except</i> HAEU and Fuel central office positions</li> </ul> </li> <li>• Human Service Case Aides</li> <li>• District Directors (ES &amp; FS)</li> </ul> Applicable DAII job classes <ul style="list-style-type: none"> <li>• VR Counselors (all levels, including Blind Svcs)</li> <li>• Rehabilitation Associates</li> <li>• Vocational Evaluators</li> <li>• Benefits Counselors (including Senior BCs)</li> <li>• Employment Placement Specialists</li> </ul>	Upon conditional offer of employment  Periodically as mandated/agreed with external regulators – currently VSH

## Agency of Human Services – Personnel Security Standards

<http://intra.ahs.state.vt.us/ahs-human-resources/recruitment/policies-procedures-1/background-checks/ahs-background-checks-applicable-job-groups/view>