



Employee's Name:

Job Title:

Department/Service Assigned:

An Assignment of Functional Category is a classification of an employee by their supervisor indicating their level of access to Individually Identifiable Health Information (IIHI) and/or Protected Health Information (PHI). This form must be completed 1) upon hiring and in-processing; 2) annually thereafter; and 3) as needed due to job changes between annual reviews. Supervisor and employees should have a discussion which clearly communicates the level of access to IIHI/PHI as well as when, and what, employees may access in the performance of their assigned duties. Functional category for medical residents or other health professional trainees is assigned within their MTT training (TMS 3185966 or 3192008). If an employee's duties are covered by more than one functional category listed below, access should be granted based on the less restrictive category to meet the need of an intended purpose.

Immediate Supervisor: Check off functional category, review with employee, obtain signatures, and maintain copy in the *Supervisor's Personnel Files* (RCS10-1,3000.18) for the individual employee.

	Functional Categories (Class of Persons)	Type of Protected Health Information Accessible	Allowable Systems of Records Notice (SORN) for Limited Access	Primary Conditions for Access to Information
<input type="checkbox"/>	Direct Care Providers (e.g., Licensed Independent Practitioners, Nurse, Chaplain, Psychologist, Pharmacist, Social Worker, Therapists, Dietitian and Health Care Professional Trainees)	Entire Health Record		Treatment of Individuals
<input type="checkbox"/>	Department of Veterans Affairs (VA) Researchers	Entire Health Record (including research records)		Activities as approved by an Institutional Review Board or Privacy Board; Preparatory to Research
<input type="checkbox"/>	Indirect Care Providers (e.g., Pharmacy/Lab/X-ray Technicians and Health Care Professional Trainees)	Entire Health Record		In support of treatment of individuals
<input type="checkbox"/>	Community Care Office Purchased Care Office Administrative Staff	Entire Health Record		In support of Purchased Care Office oversight functions such as payment, reimbursement, income verification and eligibility benefits
<input type="checkbox"/>	Health Information Support Services Staff (e.g., Medical Support Assistants, Health Unit Coordinators, Medical Record Administrators/ Technicians, Release of Information Specialists, Transcriptionists, Billing and Coding Specialists, Tumor Registrars, Enrollment and Eligibility Staff)	Entire Health Record		Assigning diagnostic codes, billing, transcription, filing, scanning, release of information, patient look-up, providing or inputting registry data, insurance and eligibility verification, patient complaints and resolution
<input type="checkbox"/>	Quality, Oversight and Investigations (e.g., Quality Management, Risk Management, Infection Control, Utilization Review, Radiation and Environmental Safety Officers, Peer Reviewers, Narcotic Inspections)	Entire Health Record		Address medical inspections, investigations, complaint review and resolution, quality reviews, patient safety reviews, compliance reviews, and provide congressional responses

	Functional Categories (Class of Persons)	Type of Protected Health Information Accessible	Allowable Systems of Records Notice (SORN) for Limited Access	Primary Conditions for Access to Information
<input type="checkbox"/>	Chief of Police, Assistant Chief of Police Officer	Limited Health Record (when necessary to complete the task)	Any Privacy Act SORN related to the task	Performing security related functions that require access to patient contact information. (i.e. parking infractions, warrants, security actions-validating presence on VA grounds, correspondence)
<input type="checkbox"/>	Police Dispatchers	Limited Health Record (when necessary to complete the task)	Any Privacy Act SORN related to the task	Performing security related functions that require access to patient contact information. (i.e. parking infractions, warrants, security actions-validating presence on VA grounds, correspondence)
<input type="checkbox"/>	Police and Security Service	Police and Security Service		Law enforcement function
<input type="checkbox"/>	Care-Related Committee Members (Committees such as; Disruptive Behavior, Ethics, Medical Record, Narcotics Review, etc.)	Entire Health Record		Treatment of individuals and health care operations with compliance and charter responsibilities
<input type="checkbox"/>	Occupational Health	Limited Health Record (when necessary to complete the task)	Any Privacy Act SORN related to the task	Treatment of employees
<input type="checkbox"/>	Patient Support Positions (e.g., Patient Advocate)	Entire Health Record		Performing Patient Support Operations
<input type="checkbox"/>	Regulatory Support Positions (e.g., Facility Information Systems Security Officers (ISSO), Privacy Officers (POs), Compliance Officers, VISN ISSO, POs and Compliance Officers, Records Managers, Research Compliance Officers, FOIA Officers)	Entire Health Record (including research records)		Monitoring and tracking of security, privacy, patient care and compliance issues
<input type="checkbox"/>	Operations Support (Contracting, Acquisitions, Human Resources, Employee Education, Library, Engineering, Telecommunications)	No need for access to PHI		Internal operations
<input type="checkbox"/>	Facility and VISN Leadership and Management	Limited Health Record (when necessary to complete the task)	Any Privacy Act SORN related to the task	Overseeing of operation and management, executive decisions for health care operations

	Functional Categories (Class of Persons)	Type of Protected Health Information Accessible	Allowable Systems of Records Notice (SORN) for Limited Access	Primary Conditions for Access to Information
<input type="checkbox"/>	Administrative Support (MHV Coordinator, Bio-Medical, Administrator Officer of the Day (AOD), Equal Employment Opportunity (EEO), Public Affairs, Call Center Support, Program Support Staff, Mail Room Staff, Food Prep Staff, Union Steward	Limited Health Record (when necessary to complete the task)	Any Privacy Act SORN related to the task	Administrative, public, and employee support
<input type="checkbox"/>	Environmental Support Staff (e.g. Groundskeepers, Building Management)	No need for access to PHI		Maintenance of grounds, buildings, and housekeeping
<input type="checkbox"/>	Information Technology (e.g. Clinical Application Coordinators, Automated Data Processing Application Coordinators (ADPACS) OI&T Staff, Decision Support Staff, Area Managers, Chief Medical Information Officers, Chief Health Informatics Officers)	Limited Health Record (when necessary to complete the task)	Any Privacy Act SORN related to the task	Maintenance and support of computer systems, as well as, employee computer support
<input type="checkbox"/>	Veterans Canteen Service, Cafeteria, Retail Store	No need for access to PHI		Retail and food services for employees and Veterans
<input type="checkbox"/>	Volunteer Services (e.g., Reception Desk, Facility Escorts, Transportation Drivers)	Limited Health Record (when necessary to complete the task)	Any Privacy Act SORN related to the task	Transportation of patients with vehicles, information desk support and escorting patients to appointments
<input type="checkbox"/>	VHA Program Office, VACO Leadership	Limited Health Record (when necessary to the complete task)	Any Privacy Act SORN related to the task	Overseeing of health care operations, budget and management, executive decisions for VHA Central Office, health care oversight, complaint/inquiry resolution



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SIGNATURES

Employee: By signing this document, I acknowledge my supervisor has explained to me and understand that I have been assigned the functional categories listed above and given computer access and VistA menu options; if applicable, to access and use Protected Health Information only in the performance of my official job duties and assigned tasks. I will not access, use, or disclose Protected Health Information in any way that does not comply with the Minimum Necessary Standard for Use and Disclosure of Protected Health Information.

Supervisor: By signing this document, I attest that I have explained the assigned functional categories and Minimum Necessary Standards for privacy to this employee.

Employee's Signature:

Date:

Supervisor's Signature:

Date:

ANNUAL REVIEWS

Note: A new VA Form 10-0539 must be completed if any changes have been made to the functional category assignments or if there has been a change in duties. If no changes have been made, complete the bottom portion during the employee's annual performance appraisal review.

Employee's Signature:

Date:

Supervisor's Signature:

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