



State of New Jersey

DEPARTMENT OF HUMAN SERVICES
DIVISION OF MEDICAL ASSISTANCE AND HEALTH SERVICES

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MEDICAID COMMUNICATION NO. 17-08

DATE: April 10, 2017

TO: NJ FamilyCare Eligibility Determining Agencies

SUBJECT: Clean Desk Policy

PURPOSE

The purpose of this Medicaid Communication is to advise all relevant staff that they are required to adhere to the Clean Desk Policy below in order to minimize any risk of unauthorized access, prohibit loss or damage to Federal tax information and to ensure the protection of confidential information belonging to any and all clients.

DEFINITIONS

Personally Identifiable Information (PII): Any information about an individual maintained by an agency, including:

- (1) Any information that can be used to distinguish or trace an individual's identity, such as name, social security number, date and place of birth, mother's maiden name, or biometric records.
- (2) Any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information.

Examples of PII include, but are not limited to:

- Name, such as full name, maiden name, mother's maiden name, or alias
- Personal identification number, such as social security number (SSN), passport number, driver's license number, taxpayer identification number, or financial account or credit card number
- Address information, such as street address or email address

- Personal characteristics, including photographic image (especially of face or other identifying characteristic), fingerprints, handwriting, or other biometric data (e.g., retina scan, voice signature, facial geometry)
- Information about an individual that is linked or linkable to one of the above (e.g., date of birth, place of birth, race, religion, weight, activities, geographical indicators, employment information, medical information, education information, financial information).

Federal Tax Information (FTI): includes return or return information received directly from the IRS or obtained through an authorized secondary source, such as Social Security Administration (SSA), Federal Office of Child Support Enforcement (OCSE), Bureau of the Fiscal Service (BFS), or Centers for Medicare and Medicaid Services (CMS), or another entity acting on behalf of the IRS pursuant to an IRC 6103(p)(2)(B) Agreement. FTI includes any information created by the recipient agency that is derived from federal return or return information received from the IRS or obtained through a secondary source.

POLICY

Printing, faxing and emailing Personal Identifiable Information (PII) and/or Federal Tax Information (FTI)

- Staff members are strongly discouraged from printing anything containing PII or FTI. If the information must be printed, every effort should be made to safeguard the printed data from unauthorized access.
- Printers must be cleared of all material immediately to ensure the documents are not viewed by an unauthorized person.
- If the printed data contains FTI, it must be logged on the Access Movement and Destruction Log (see attached), labeled and locked until disposed of using a cross-cut shredder 1mm x 5mm in size or smaller.
- Managers and Supervisors are required to conduct monthly reviews of FTI logs to ensure that logs are properly completed and FTI is locked and destroyed accordingly.
- Fax machines should be checked regularly and incoming faxes distributed to appropriate staff for safeguarding.
- FTI may not be transmitted via fax in any instance.
- FTI may not be transmitted via email in any instance.
- Shred all unneeded case documents and never discard in office recycle bin or trash cans to sit unsecured and unattended.
- Report any unattended sensitive documents to management for appropriate action.
- Emails should only contain non-identifying information. Never send social security numbers electronically without using secure email (i.e., encryption).

Securing the Workstation

- Staff members must lock their office, workstation, and/or computer screen anytime they step away from their computer. Staff must also ensure that the position of their computer monitor is not exposed to open aisles or viewing by unauthorized individuals, including clients.
- Visitors to the office for purposes other than business should be limited. All attempts must be made to meet with visitors outside of the office.
- If an unauthorized individual is present, staff must ensure that client-specific documents are turned over, placed in a folder or put in a drawer.
- When transferring case files, staff must ensure all documents are delivered directly to the new case owner. If the files contain FTI, they must be locked during transit, must be logged on the Access Movement and Destruction Log and must be acknowledged by the recipient.
- Do not display sensitive documents or information. Examples include:
 - User IDs and Passwords
 - IP Addresses
 - iAcquire Screens or Reports
 - Case Numbers and Docket Numbers
 - Employee Records
 - Anything you would not want disclosed about yourself
- Lock all sensitive documents and computer media in drawers or filing cabinets when not in use or done for the day.
- Managers and supervisors are required to conduct weekly checks of employee work stations before and after business hours to ensure compliance with the clean desk policy.

If you have any questions regarding this Medicaid Communication, please refer them to the Division's Office of Eligibility field staff for your agency at 609-588-2556.

MD:kw

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