

Adopted: January 25, 2011

Minnewaska Area Schools Policy 1017

Revised: _____

Origin: 2010

1017 HEALTH INFORMATION PORTABILITY AND ACCOUNTABILITY ACT OF 1996 (HIPAA): Health Information Physical Security Policy

Introduction

Minnewaska Area Schools Day Treatment has adopted this Health Information Physical Security Policy to comply with the Health Information Portability and Accountability Act of 1996 (“HIPAA”), the Department of Health and Human Services (“DHHS”) security and privacy regulations, and the Joint Commissions on Accreditation of Healthcare Organizations (“JCAHO”) accreditation standards, as well as our duty to protect the confidentiality and integrity of confidential medical information as required by law, professional ethics, and accreditation requirements. All personnel of Minnewaska Area Schools Day Treatment must comply with this policy. Familiarity with the personnel security policy and demonstrated competence in the requirements of the policy are an important part of every employee’s responsibilities.

Assumptions

This Health Information Physical Security Policy is based on the following assumptions:

- As a health care provider, public access to our buildings is a necessity.
- The public does not, however, need absolute access to all areas within our buildings.
- Limiting physical access to health information and the system that such information resides in is often the first step to denying unauthorized access to such information.
- Limiting physical access to health information and the system such information resides in is often a cost-effective way to protect such information.
- Physical security measures must not be so onerous as to hamper the provision of health services.
- For some information devices, such as laptops and palm pilots, physical security is the only effective way of protecting the device and the information that resides in it.

Policy

- This policy supplements Minnewaska Area Schools Day Treatment’s overall physical security policy that is intended to prevent crimes, such as assault, theft, and vandalism, and covers the physical security of health information.
- All personnel (employees, staff, contract workers, and so forth) who have access to health information must read, understand, and comply with this policy.
- Access to computer rooms will be limited to personnel who require access for the normal performance of their duties. The Principal is responsible for determining who has physical access to computer rooms.

- Equipment housed in open areas must be attached to an immovable object by a security cable.
- Computer monitors should, when possible, be situated so that unauthorized people cannot view the information on the screen. Screen savers should be used in accordance with the Policy on Workstation Use.
- The Principal is responsible for installing electrical power protection devices to suppress surges, reduce static, and provide backup power in the event of a power failure.
- Equipment removed from the facility must be removed only in accordance with the relevant policy, such as for media control or for laptops, or with the permission of the director of information systems. The director will keep records of the removal/receipt of such equipment.
- All personnel who detect or suspect a security problem relating to health information should immediately report the problem to the director of information systems. Such personnel should follow up immediate notification with a written memorandum that includes the following information:
 - Narrative of the physical security problem.
 - Estimate of how long the problem may have existed.
 - Suggested solutions.

Enforcement

All officers, agents, and employees of Minnewaska Area Schools Day Treatment **must** adhere to this policy, and all supervisors are responsible for enforcing this policy. Minnewaska Area Schools Day Treatment will not tolerate violations of this policy. Violation of this policy is grounds for disciplinary action, up to and including termination of employment and criminal or professional sanctions in accordance with Minnewaska Area Schools Day Treatment’s medical information sanction policy and personnel rules and regulations.

Signature of Officer, Agent, or Employee

Date

Title of Officer, Agent, or Employee

Printed Name of Officer, Agent, or Employee
