

Polk County Government
PHYSICAL SAFEGUARDS
Device and Media Controls Policy and Procedures
45 CFR §164.310 (d)(1)

Policy 602.S

Effective Date: November 15, 2004 Revision Date:

I. Policy

- A. Polk County Government will implement policies and procedures that govern receipt and removal of hardware and electronic media that contain electronic protected health information (EPHI) into and out of Polk County Government, and the movement of these items within Polk County Government.
- B. The Information Technology Department will be responsible for implementation of policies and procedures that govern the receipt and removal of hardware and electronic media that contain EPHI into, out of and within Polk County Government.
- C. The policies and procedures will include the following:
 - 1. Disposal: Implementation of policies and procedures to address the final disposition of EPHI and/or the hardware or electronic media on which it is stored.
 - 2. Media Re-Use: Implementation of policies and procedures for removal of EPHI from electronic media before the media are made available for re-use.

II. Procedures

- A. The Information Technology Department, with support from existing County Policies, will implement additional policies and procedures to regulate the receipt and removal of hardware and electronic media that contain Polk County Government's EPHI into, out of and within Polk County Government.
 - 1. These policies and procedures pertain to the use of hard drives, storage systems, removable disks, floppy drives, CD ROMs, Personal Computer Memory Card International Association (PCMCIA) cards, memory sticks and all other forms of removable media and storage devices.
- B. The Information Technology Department will inventory all hardware and electronic media that contain EPHI.
 - 1. The inventory will include all devices and electronic media that contain EPHI.

- C. All devices and electronic media containing EPHI from Polk County Government will be regulated by the security policies and procedures of Polk County Government.
 - 1. Security policies regulating devices and electronic media contain EPHI from Polk County Government will include all administrative safeguards, all relevant physical safeguards and all technical safeguards.
 - 2. Specifically, devices and electronic media containing EPHI must have access controls to prevent unauthorized access.
- D. All devices and electronic media, to the extent reasonable, will be inventoried and their use will be regulated.
 - 1. All devices and electronic media will be secured, to the extent reasonable, in a locked environment when not signed out for use.
 - 2. All devices and electronic media containing EPHI will be controlled by a “sign out” procedure. The governing Department or Information Technology Department, to the extent reasonable, will sign out the device or electronic media. The time period for use may be limited or unlimited. Returns will be strictly monitored.
 - 3. Any devices or electronic media that are not signed out by an authorized user will be considered an unauthorized use and may subject an individual to security incident sanctions.
- E. All EPHI stored in devices or electronic media will be backed up to the extent backup is possible.
- F. The Information Technology Department, and/or the governing departments will be responsible for providing security awareness and training to all users of devices or electronic media containing EPHI regarding the Security Rule requirements.
- G. The Information Technology Department, in coordination with the governing departments and Privacy Officer, will be responsible for creating, maintaining and retaining documentation relating to the regulation and use of devices and electronic media containing EPHI.
- H. The documentation will be retained by the Privacy Officer for at least six years from the date of creation.