

Polk County Wisconsin

HIPAA Security Standard Policy 45 CFR §164.306 Required

Policy 602.A

Effective Date: August 17, 2004

Revision Date:

Policy

- A. Polk County Government will provide security safeguards in compliance with state and federal laws to:
1. Ensure the confidentiality, integrity and availability of all electronic protected health information (EPHI) that Polk County Government creates, receives, maintains and transmits.
 2. Protect against any reasonably anticipated threats or hazards to the security or integrity of such information.
 3. Protect against any reasonably anticipated uses or disclosures of such information that are not permitted or required under federal law.
 4. Ensure compliance with the Security Standards by Polk County Government's workforce.
- B. The safeguards will include:
1. Administrative Safeguards to develop, implement and monitor security measures relating to EPHI including supervision and regulation of the workforce.
 2. Physical Safeguards to protect and control accessibility to facilities and systems.
 3. Technical Safeguards to protect EPHI using access controls, audit controls and transmission mechanisms.
- C. Polk County Government will designate the Information Technology Department the responsible for development, implementation and monitoring of the security safeguards.
- D. Non-compliance with Polk County Government's security safeguards and/or state and federal security requirements may result in immediate corrective action that may include suspension, termination and/or criminal prosecution. See *Policy 601.P Confidentiality Security and Access to PHI and Policy 716 Employee Discipline*.

- E. Flexibility of Approach. Polk County Government may use any security measures that allow Polk County Government to reasonably and appropriately implement the standards and implementation specifications of the Security Rule. In deciding which security measures to use, Polk County Government will take into account the following factors:
1. The size, complexity and capabilities of Polk County Government .
 2. Polk County Government's technical infrastructure, hardware and software security capabilities.
 3. The cost of security measures.
 4. The probability and criticality of potential risks to EPHI.
- F. Implementation Specifications. Polk County Government will implement implementation specifications as required by the Security Rule.
1. Required: When a standard adopted in the Security Rule includes required implementation specifications, Polk County Government will implement the implementation specification.
 2. Addressable: When a standard adopted in the Security Rule includes addressable implementation specifications, Polk County Government will:
 - a) Assess whether each implementation specification is a reasonable and appropriate safeguard in its environment when analyzed with reference to the likely contribution to protecting Polk County Government's EPHI; and
 - b) Implement the implementation specification if reasonable and appropriate or if not reasonable and appropriate, document why not and implement an equivalent alternative.
- G. Maintenance: Polk County Government will review and modify security measures as needed to continue the provision of reasonable and appropriate protection of EPHI.