

Polk County Government
PHYSICAL SAFEGUARDS
Device and Media Controls
Media Re-Use Policy and Procedures
45 CFR §164.310 (d)(2)(ii)

Policy 602.U

Effective Date: November 15, 2004 Revised Date:

I. Policy

- A. Polk County Government will implement procedures for removal of electronic protected health information (EPHI) from electronic media before the media are made available for re-use.
- B. The Information Technology Department will be responsible for implementation of procedures that assure removal of EPHI from electronic media before the media are made available for re-use.

II. Procedures

- A. The Information Technology Department will implement procedures that require all EPHI that must be retained to be copied or moved to other media, before the media are made available for re-use.
 - 1. Before any EPHI is removed, the workforce member will verify that information required to be retained has been copied or moved.
 - 2. The workforce member will document that the copy or information move has been made.
- B. The following steps may be used to ready media for re-use:
 - 1. The “delete” command may be used to remove files.
 - 2. Reformatting of the disk may be done to make files inaccessible to other users.
 - 3. Hard Disk Drives may be “wiped” in order to remove all data from the Master Boot Record, FAT tables, and Data Area.
- C. The Information Technology Department will document all activities related to preparing electronic media for re-use.
- D. The documentation will be maintained by the Information Technology Department and Privacy Officer, and retained for at least six years from the date of creation.