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|  | Security | Rio Grande Valley HIE | Policy: S14 |
| | Effective Date 11/20/2015 | Last Date Revised/Updated 11/20/2015 | Date Board Approved: 11/20/2015 |
| Subject: Physical Safeguards – Device and Media Controls | | | |

FEDERAL REGULATION:

45 CFR 164.310(d)

POLICY:

Rio Grande Valley Health Information Exchange (RGV HIE) is committed to ensuring that the receipt and removal of hardware and electronic media (including those containing ePHI) complies with the security regulations. This policy outlines procedures that govern the receipt and removal of information systems and electronic media containing ePHI that are moved to various locations.

The purpose of this policy is to establish guidelines for the following:

- **Disposal.** Procedures that address the final disposition of electronic protected health information (ePHI) and/or hardware or electronic media on which it is stored.
- **Re-Use.** Procedures that address the removal of ePHI from electronic media before the media are made available for re-use.
- **Accountability.** Procedures to maintain records of the movements of hardware and electronic media and any person responsible.
- **Data Back-Up and Storage.** Procedures to create a retrievable, exact copy of ePHI, when needed, before movement of equipment.

PROCEDURE:

Disposal

Disposal refers to the removal of computers, laptops, etc from RGV HIE which is either destroyed, or transferred to another entity. All ePHI on decommissioned devices and storage media must be irretrievably destroyed, in order to protect the confidentiality of the data contained. If the device or media contains ePHI that is not required or needed, and is not a unique copy, a data destruction tool must be used to destroy the data on the device or media prior to disposal. A typical reformat is not sufficient as it does not overwrite the data. If the device or media contains the only copy of ePHI that is required or needed, a retrievable copy of the ePHI must be made prior to disposal.

Devices include:

- **Fixed Internal Disks:** examples include laptop hard drives. Any drive that may contain ePHI will be disposed of by a HIPAA compliant disposal company that offers degaussing and shredding of disks.
- **Optical Disks:** examples include CD-Rs and DVDs. Data should be removed, if possible, from any optical disk that may contain ePHI and then subsequently shredded, broken, or shattered.

- **Removable Storage Device.** Are not authorized to store ePHI.
- **Paper:** Hard-copy containing sensitive information should be shredded using a cross-cut shredder.

Reuse

Reuse refers to the transfer of laptops etc to another person, location, or facility within RGV HIE. Any equipment or storage media that contains confidential, critical, internal use only, and/or ePHI must be destroyed in accordance with this policy. Any equipment or storage media that will be available for reuse should be forwarded to the IT Department for proper sanitizing. No operating system or application shall be loaded or available on the device due to licensing restrictions. No RGV HIE information shall be on the device.

Accountability

RGV HIE shall have an exact retrievable copy of ePHI prior to the transfer of equipment/media storing such ePHI from one user to another. All devices and media that may have at any point contained or processed ePHI shall be identified with a unique identifier and RGV HIE must maintain a log of these devices and media. RGV HIE must track and maintain records of the movement of such devices and the media and the parties responsible for the device and media during its movement, including when the device or media first encountered ePHI, where the device is physically located, and if and when the device or media has been thoroughly and appropriately cleaned of ePHI and /or transported outside of RGV HIE's control.

The Executive Director shall organize the movement and destruction of disks and maintain all documentation:

- Remove the disks from the machine and inventory
- Ensure the person responsible for movement of disks signs the inventory
- Obtain a Chain of Custody receipt
- Obtain a Certificate of Destruction

Data Back-Up and Storage

It is against RGV HIE policy to store ePHI in the RGV HIE offices or on RGV HIE devices.