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	Approved by: Scott Bae	Date: 02/02/2015		
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POLICY:

It is the policy of Heritage Provider Network to identify and determine the appropriate physical safeguards of protected health information (PHI) residing on all electronic information systems in order to perform their work and to remove access when the needs change.

PURPOSE:

The purpose of this policy is to secure the facility access to the information systems containing PHI only to those necessary to perform their work functions.


DEFINITIONS:

1. Protected Health Information – Individually identifiable health information that is transmitted or maintained by electronic media or transmitted or maintained in any other form or medium.
2. Individually Identifiable Health Information – Health information which includes demographic information that relates to the past, present or future physical or mental health or condition of an individual; the provision of health care to an individual; or the past, present or future payment for the provision of health care to an individual and that identifies the individual or there is a reasonable basis to believe the information can be used to identify the individual.

PROCEDURE:

1. Heritage Provider Network secures access to facilities containing Information Systems hardware and software using secured access controls to ensure only authorized personnel can enter and access the equipment. The list of the authorized personnel is defined based on the job requirements.
2. HPN stores all servers in a locked and secured temperature controlled server data room.
3. HPN facilities containing PHI are secured by security alarm systems with monitoring services as well as key/fob access control systems where their entry is logged. The access system is tested and the logs are reviewed on a regular basis.

PROCEDURE (continued):

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4. When maintenance is required to the facility that requires the facility access controls to be repaired or modified, such as repairs or changes to the hardware, walls, doors, locks, and security access system, maintenance records will be kept to ensure all information is logged.
5. HPN also conducts periodic security assessments that will identify appropriate access levels to the various facility controls containing PHI and make necessary adjustments based on changes in the job requirements.

Enforcement

1. Heritage Provider Network's Security Officer, office managers, human resources, and compliance committee is responsible for enforcing this policy. Employees and workforce members who violate this policy will be subject to disciplinary action, up to and including termination or dismissal.