

Great Rivers Behavioral Health Administrative Services Organization

Policy Title:	Physical Safeguards	Policy No. 5016.00
Category:	Privacy & Security	Date Adopted: 1/10/2020 Date Revised: Date Reviewed:
Reference:	45 CFR § 164.310 - Physical safeguards Great Rivers BH-ASO Disaster Recovery Plan	

Policy

- 1.1. Great Rivers Behavioral Health Administrative Services Organization (Great Rivers BH-ASO) will implement physical measures to protect Great Rivers BH-ASO electronic information systems and related building equipment, from natural and environmental hazards and unauthorized services.
- 1.2. Great Rivers BH-ASO shall implement reasonably address physical safeguards to protected Electronic Protected Health Information (ePHI) and cover 45 CFR § 164.310 - Physical safeguards.
- 1.3. The Security Officer is responsible for identifying and addressing changes that may affect the physical safeguards set in place.

Procedure

- 2.1. Facility Access Controls
 - 2.1.1. To ensure that only authorized individuals have access to Great Rivers BH-ASO's server room facilities, access is controlled and validated by:
 - 2.1.1.1. A minimum of two doors physically controlling access to the server room.
 - 2.1.1.2. Only Great Rivers BH-ASO's staff responsible for the server and disaster recovery personnel shall have key to access the server room.
 - 2.1.1.3. Keys to the server room shall be monitored and be accounted for at Great Rivers BH-ASO.
 - 2.1.2. The server room will not be left unsecured allowing access by unauthorized personnel. All personnel must be validated and approved prior to access to server room. Keys to the server room will be limited to those whose job requires access to the servers. No
 - 2.1.2.1. Visitors to the facility are required to sign a log that records the time of arrival and departure.
 - 2.1.2.2. Visitors to the facility must be escorted as appropriate and, if working near or with ePHI have appropriate authorization and/or supervision and have signed an oath of confidentiality agreement.
 - 2.1.2.3. A log will be kept to document all facility repairs or modifications that are related to security.

- 2.1.2.4. Temporary authorization to access Great Rivers BH-ASO's facility and electronic information systems may be granted to repair personnel or technicians for the purpose of restoring lost data or repairing damaged equipment as long as proper supervision is provided.
- 2.1.3. Any ePHI equipment kept in the facility is to be kept in a locked room or shall have staff member monitoring access to the offices when the facility is not locked.
- 2.1.4. All personnel must be validated and approved prior to access to equipment containing ePHI.
 - 2.1.4.1. Visitors to the facility are required to sign a log that records the time of arrival and departure.
 - 2.1.4.2. Visitors to the facility must be escorted as appropriate and, if working near or with ePHI have appropriate authorization and/or supervision and have signed an oath of confidentiality agreement.
- 2.1.5. Staff shall report to Security Officer when there is an indication ePHI is not being kept in a secure physical location or there is indication that the locks or key pads may not be working.
- 2.1.6. Windows to the facility shall be locked when no one is in the office.
- 2.1.7. When utilizing a key pad as a lock, the key pad should be updated at least quarterly and whenever a staff person leaves that has knowledge of the door code.
- 2.1.8. Access to locked offices is defined by the role of the individual within the organization and giving of key or door code is based on the requirements of the individual to complete their duties.
 - 2.1.8.1. Keys to offices that contain ePHI shall be tracked and collected when job role changes. If not collected, the door lock will be changed, contact the Chief Operations Officer for assistance.
- 2.2. Great Rivers BH-ASO maintains a Disaster Recovery plan that shall be followed when it comes to the access of ePHI during an emergency.
- 2.3. Records and documentation related to maintaining physical safeguards shall be saved and kept for ten (10) years.

POLICY SIGNATURE

Edna J. Fund, Chair
Great Rivers BH-ASO Governing Board

Date