POLICY & PROCEDURE

TITLE: Overview of Covered Entities Security Responsibilities				
Scope/Purpose: Organizational Requirements				
Division/Department: All HealthPOiNT Clinics and Departments		Policy/Procedure #: 1.5		
Original Date: 01/03/2012		___New _X_Replacement for: Same		
Date Reviewed:	Date Revised:	Implementation:	CPIC Approved:	Board Approved:
	07/28/2015	January 27, 2016	January 27, 2016	
Responsible Party: Director of Compliance/QA; HIPAA Security Officer; Director of IT				

DEFINITIONS:

    Protected Health Information (PHI) – individually identifiable health information held or transmitted by a covered entity, or its business associates, in any form or media, whether electronic, paper or oral.

POLICY:

    HealthPoint is a covered entity under the Health Insurance Portability and Accountability Act (HIPAA), and is responsible for complying with the HIPAA Security Standards for the Protection of PHI (Security Standards).

PROCEDURE:

I.   HealthPoint is responsible for the following actions under the Security Standards:

    A. Ensuring the confidentiality, integrity, and availability of all PHI that it creates, receives, maintains, or transmits;

    B. Protecting against any reasonably anticipated threats or hazards to the security or integrity of PHI;

    C. Protecting against any reasonably anticipated uses or disclosures of PHI which would violate the HIPAA Privacy Standards; and

    D. Ensuring that its workforce complies with the Security Standards.

II.   HealthPoint is responsible for selecting security measures that allow it to reasonably and appropriately implement the Security Standards. HealthPoint must take the following factors into account in selecting security measures:

    A. The size, complexity, and capabilities of the organization

    B. Its technical infrastructure, hardware and software security capabilities;

    C. The cost of security measures; and

    D. The probability and criticality of potential risks to PHI.

III. HealthPoint must comply with each standard included in the Security Standards. The Security Standards also include two types of implementation specifications: "Required" specifications and "Addressable". A covered entity must implement all specifications that are designated as "Required" under the Security Standards. For implementation specifications that are designated as Addressable" HealthPoint should do the following:

    A. If the addressable specification is reasonable and appropriate for HealthPoint, then the organization should implement that specification.

    B. If the addressable specification is not a reasonable and appropriate safeguard in HealthPoint's environment, HealthPoint must:

        1. Document why it is not reasonable and appropriate to implement the addressable specification; and (ii) implement an equivalent security measure, if that security measure is reasonable and appropriate to achieve the goals for that implementation specification.

        2. If there are no measures which are reasonable and appropriate in HealthPoint's environment, to achieve the goals for a particular addressable specification, then HealthPoint must document the rationale for not implementing a security measure in this area

IV. HealthPoint must review and modify its security measures on an on-going basis, as needed, to continue provision of reasonable and appropriate protection of PHI.

RELATED POLICY:
    HIPAA Risk Analysis

REFERENCES:
    45 CFR §164.306(b)
    45 CFR §164.308
    45 CFR §164.310
    45 CFR §164.312

REQUIRED BY:
    HIPAA Security Standards

ATTACHMENTS/ENCLOSURES:

POLICY/PROCEDURE TRACKING FORM

TITLE: Overview of Covered Entities Responsibilities					
Scope/Purpose: Organizational Requirements					
Division/Department: All HealthPOiNT Clinics and Departments			**Policy/Procedure #:**		
Original Date: 01/03/2012			___New _X_Replacement for: Same		
Date Reviewed:	**Date Revised:**	**Implementation:**	**CPIC Approved:**	**Board Approved:**	
	07/28/2015	January 27, 2016	January 27, 2016		
Date of Revision	**Description of Changes**				
07/28/2015	Update to new format/ Change from BVCAA to HealthPoint; clarification of security requirements				