Policy 10
Device and Media Controls Policy

1. All CDs and other media that may contain electronic protected health information should be erased prior to reuse and destroyed or erased consistent with Department of Defense standards prior to disposal.
2. When hard drives are disposed of they should be destroyed or erased in a manner consistent with Department of Defense standards. This may involve using the services of a vendor that specializes in destruction of sensitive information.
3. Prior to moving or erasing the data on any hard drives or servers containing electronic health records or other protected health information, an exact duplicate copy should be made of the information.
4. The Security Officer is responsible for keeping an inventory of all computer workstations or mobile devices such as laptops and changes related to such workstations and devices.

Explanation of the Data and Media Controls Standard and Instructions for Utilizing the Data and Media Controls Policy

The Data and Media Controls Standard requires covered entities to implement policies and procedures related to moving hardware and electronic media into thefacility/office, out of the facility/office, and within the facility/office. The standard includes four implementation specifications. Policy 10 is a sample Device and Media Controls Policy.

a. Disposal

This specification requires covered entities to implement policies and procedures dealing with the safeguarding of electronic protected health information that is being disposed of, including the disposal of hardware or other media containing such information. For example, policies and procedures might deal with the appropriate erasure or destruction of computer hard drives or data CDs prior to disposal.

b. Media re-use

Similarly, the "Media re-use" specification would require policies and procedures addressing the erasure of protected health information from electronic media that is being re-used. For example, a physician office that puts electronic protected health information on CDs or flash drives might develop a policy requiring the erasure of all such media prior to re-use.

c. Accountability

The "Accountability" implementation specification involves the maintenance of a record of the movement of hardware and electronic media and the documentation of persons responsible for such movement. For example, a log might be kept of all circumstances where hardware and/or electronic media is removed from the physical premises or moved to a different location.

d. Data backup and storage

"Data backup and storage" requires covered entities, prior to moving any equipment, to create a retrievable exact duplicate copy of all electronic protected health information housed on the equipment.

This standard would only apply in those circumstances where the electronic protected health information is actually housed on the equipment that is being moved. For example, if the electronic protected health information is actually housed on a network or server, rather than on the individual workstation, then this specification would not apply to situations where a workstation is being moved.