



Subject:	Maintenance Records Policy	Policy No:	PS107
Signature		Original Issue:	4/12/05
SEC Approval:	Marilee McGuire	Date:	4/7/05
Prepared By:	Jeff Cains	Effective Date:	4/20/05

Purpose:

The purpose is to implement policies and procedures to document repairs and modifications to the physical components of a facility which are related to security (for example, computer equipment, walls, doors, and locks).

Scope:

This policy applies to Community Health Plan (CHP) in its entirety, all workforce members, including consultants, contractors, business associates and vendors. Further, the policy applies to all systems, network, and applications, as well as all facilities, which process, store or transmit electronic protected health information (ePHI).

Policy:

CHP will identify the physical components that are essential to security. The Security Officer shall oversee any security-relevant physical modifications. A maintenance record shall be created for each modification made to the physical site, computer equipment, facility or building. Such information must be securely stored.

A copy of this Policy will be retained for a minimum period of six (6) years from the date it was created or, if revised, for a minimum period of six (6) years from the date it was last in effect.

Responsibilities:

The Security Officer is responsible for ensuring the implementation of the Maintenance Records Policy.

Compliance:

Failure to comply with this or any other security policy will result in disciplinary actions as described in the Sanction Policy. Legal actions also may be taken for violations of applicable regulations and laws such as HIPAA.

Maintenance Records is an addressable implementation specification defined within the Facility Access Controls standard (164.310 (a)(1)) in the Physical Safeguards category of the HIPAA Security Rule.

Procedure(s):

Information Technology Infrastructure

- Documents the possession of all company hardware, printers, switches, firewalls, telephone systems, computers, servers and backup systems.
- Maintains a record of repairs to or maintenance of hardware, printers, switches, firewalls, telephone systems, computers, servers, PDAs, Blackberry email devices, mobile telephones and backup systems in connection with transmission or storage devices containing ePHI.
- Documents the disposal of hardware, printers, switches, firewalls, telephone systems, computers, servers, PDAs, Blackberry email devices, mobile telephones and backup systems

that transmit or contain ePHI as per the Disposal Policy. This procedure also applies to portable storage devices including:

- USB storage devices
- CD/R/RWs
- DVDs
- Floppy disks
- Zip disks
- Jazz drives
- Removable hard drives
- External hard drives
- Tapes
- Optical disks

As referenced in the Security Policy, Facilities will establish and document procedures for maintaining a record of all maintenance to physical components as required under 45 CFR § 164.310.

Form(s):

None

Definition(s):

Definitions for all policies are included in the glossary section of the Appendix.

References:

- HIPAA Final Security Rule, 45 CFR Parts 160, 162, and 164, Department of Health and Human Services, <http://www.cms.hhs.gov/hipaa/hipaa2/regulations/security/default.asp>, February 20, 2003.
- Getting Started with HIPAA, Uday O. Ali Pabrai, Premier Press, April 2003.
- CMS, "CMS Information Systems Security Policy, Standards and Guidelines Handbook", CMS, February 2002.
- International Standards Organization (ISO/IEC 17799:2000(E))

Contact:

See Master Contacts List

Revision History		
Revision Date	Revision	Revision Made By
10/24/05	Removal of Contacts and consolidation in Master Contact List	Carrie Hardie
3/22/06	Changed all references from "Community Health Plan of Washington" to "Community Health Plan" and "CHPW" to "CHP"	Carrie Hardie