

# HIPAA-34: Hardware and Media Accountability Policy

Effective Date:	12-01-2015	Last Revised:	7-17-2017
-----------------	------------	---------------	-----------

## Scope of Policy

This policy governs the Accountability of Information Systems Hardware and Media for **TCS**. All personnel of **TCS** must comply with this policy. Demonstrated competence in the requirements of this policy is an important part of the responsibilities of every member of the workforce.

## Assumptions

- TCS** must comply with HIPAA and the HIPAA implementing regulations, in accordance with the requirements at § 164.310(d)(1-2).
- Proper protection of individually identifiable health information, including Protected Health Information ("PHI", as defined by HIPAA), requires that we maintain records of the movements of hardware and electronic media, and any person responsible therefore.

## Policy Statement

- It is the Policy of **TCS** to maintain records of the movements of hardware and electronic media, and any person responsible therefore, in full compliance with all the requirements of HIPAA.
- Responsibility for the development and implementation of this hardware and media accountability policy, and any procedures associated with it, shall reside with the Executive Director, who shall ensure that this policy is maintained, updated as necessary, and implemented fully throughout our organization.
- Specific procedures shall be developed to ensure that we maintain records of the movements of hardware and electronic media, and any person responsible therefore.
- It is the Policy of **TCS** to fully document all hardware and media accountability-related activities and efforts, in accordance with our Documentation Policy.

## Procedures

- TCS** has instituted an asset inventory management process to track the movement of hardware and electronic media into and out of the organization. This means that every device or media control known to the organization to house electronic PHI is identified with a unique tracking number and the disposition of each device is routinely tracked.
- Hardware which holds ePHI that leaves the custody of **TCS**, shall be tracked by a Chain of Custody Form acknowledging custody and responsibility while in custody of 3<sup>rd</sup> party.

**Note;** See Chain of Custody Form in HIPAA Policy Addendum