SOUTHERN HIGHLANDS COMMUNITY MENTAL HEALTH CENTER

POLICY AND PROCEDURE MANUAL

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Policy 537 – Administrative Safeguards – Workforce-related Security Measures

I.   **PURPOSE**

Southern Highlands Community Mental Health Center, in an effort to be compliant with the Privacy Rule of HIPAA's Administrative Simplification provisions, sets out, in this policy, the requirements for safeguarding PHI. This policy recognizes that our workforce is the foundation for our security environment.

II.   **POLICY**

Southern Highlands Community Mental Health Center will create and maintain procedures directed toward the behavior of our workforce that promote an environment for PHI that is reasonably secure from accidental, intentional, or inadvertent disclosures that violate the Privacy Rule.

It will be our policy to create and maintain guidelines on workstation use that are documented. These guidelines will address:

1.   The proper functions to be performed;

2.   The manner in which those functions are to be performed – the documentation of the actual function and how it is to be performed; and

3.   The attributes of the physical environment in which the workstations, including laptops and other portable devices, are to be located – the attributes will vary based on the sensitivity of information that typically is accessed from that environment.   Attributes include such things as physical access to the workstation itself and to the area it is located in, the removable media, and the practices around writing down passwords where others can find/use them.

It will be our policy to provide security awareness training to all members of the workforce and to any independent contractors who have access to our workplace and systems at orientation as part of the HIPAA training. Awareness training will be directed at all of these individuals, regardless of their roles or access to PHI – it's purpose will be to provide education around such things as: password maintenance, security indicent reporting, and virus and other forms of destructive software.

Other policies and procedures to review that are related to this policy:

Minimum Necessary
Administrative Requirements – Training
Administrative Safeguards – Access Controls
Administrative Requirements – Documentation