

SOUTHERN HIGHLANDS COMMUNITY MENTAL HEALTH CENTER
POLICY AND PROCEDURE MANUAL

Date of Issue: 4/1/03
Date Revised: 7/1/20

Section Number 538

Policy 538 – Administrative Safeguards – Access Control

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 by controlling access to our facilities and electronic systems.

II. POLICY

Southern Highlands Community Mental Health Center will create and maintain procedures to safeguard all of our locations from unauthorized physical access and to safeguard hardware and other equipment from unauthorized physical access, theft, and interference.

We will limit and control physical access to any and all parts of the designated record set. Our paper medical record files will be placed in limited access spaces and access to those records will be controlled by medical records, or other appropriate, staff.

Electronic files will be subject to access controls that will limit user access to that PHI for which they have clearance. See Minimum Necessary Policy and Procedure. Controls for access to non-PHI data will be established and maintained in accordance with either context, role, or user based criteria. These controls will include a process for setting criteria for granting access and for modification of the criteria.

Our systems will maintain an access authorization record to document and review the level of access granted to a user, program, or procedure.

We will assure that systems maintenance personnel have proper access authorization.

We will not transmit PHI over the Internet (open network) without some form of encryption intended to limit access to information. SHCMHC system is currently encrypted for all users.

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

Minimum Necessary
Administrative Requirements – Training
Administrative Requirements – Documentation
Designated Record Set