



**COUNTY OF EL DORADO, CALIFORNIA
BOARD OF SUPERVISORS POLICY**

Subject: PRIVACY: ADMINISTRATIVE, TECHNICAL , AND PHYSICAL SAFEGUARDS	Policy Number	Page Number: Page 1 of 2
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BACKGROUND:

The Health Insurance Portability and Accountability Act (“HIPAA”) requires covered entities to establish appropriate administrative, technical, and physical safeguards to protect the privacy of protected health information (“PHI”) [45 CFR §164.530(c)]. The purpose of this policy is to establish the appropriate safeguards and to minimize the risk of unauthorized access, use, or disclosure of PHI.

NOTE: HIPAA will not supercede any contrary State law that imposes more stringent privacy protections.

POLICY:

1. Reasonable Precautions [45 CFR §164.530(c)(2)]

El Dorado County must take reasonable precautions to protect PHI from intentional or unintentional use or disclosure by implementing appropriate administrative, technical, and physical safeguards. Administrative safeguards include, as necessary, developing and revising management policies and procedures. Physical safeguards include preventing unauthorized access by securing rooms and media. Technical safeguards are implemented procedures designed to protect sensitive information.

2. Administrative Safeguards

- a. Implement role-based access and the Minimum Necessary Policy to promote administrative safeguards.
 - i. Role based access is a form of security which allows access to data based on job function or responsibilities.
- b. Conduct periodic internal reviews to evaluate and improve the effectiveness of current safeguards.
- c. Develop and implement department policies when necessary to enhance administrative safeguards.
 - i. Members of El Dorado County’s workforce who have access to protected health information will sign a privacy/security acknowledgment form to adhere to privacy and security policies.



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3. Technical and Physical Safeguards

a. Paper Documents

- i. If available, El Dorado County will store files and documents containing PHI in locked rooms or storage systems;
- ii. If lockable storage is not available, staff must take reasonable efforts to ensure the safety of confidential information;
- iii. El Dorado County will ensure files and documents awaiting disposal are appropriately labeled, disposed of on a regular basis, and all reasonable measures are taken to minimize access.
- iv. El Dorado County will ensure shredding of files and documents are performed in a timely manner, consistent with record retention policies.

b. Oral Communications

- i. El Dorado County staff must take reasonable steps to protect the privacy of all verbal exchanges or discussions of confidential information;
- ii. El Dorado County must foster employee awareness that verbal exchanges have the potential for inadvertent disclosures of confidential information.

c. Visual Access

- i. El Dorado County must take reasonable steps to shield observable confidential information from unauthorized disclosure on computer screens and paper documents.
 - A. Computer screens: El Dorado County will make every effort to ensure confidential information on computer screens is shielded from unauthorized persons.
 - B. Paper documents: El Dorado County staff must be aware of the risks regarding how paper documents are used and handled and take necessary precautions to safeguard confidential information.

Primary Department: Privacy Compliance Office

References: 45 CFR § 164.530 (c)