

Detected outside of hours of operation:

- If immediate action is necessary, arrangements should be made to contact the Systems Administrator, or another manager, who will contact the appropriate authorities and take any necessary steps to secure the premises until a complete evaluation of the damage can be made.
- In all instances, follow-up reports should be made to the Systems Administrator.

ROUTINE DESTRUCTION OF PROTECTED HEALTH INFORMATION

- All documents containing protected health information should be separated from regular trash and destroyed either by shredding or burning.
- When damaged, defective, or obsolete, all disks, tapes or any other storage medium containing PHI should be either erased or destroyed.

REPAIR AND ACCESS TO COMPUTER EQUIPMENT

- Access to equipment containing PHI by any service technician should kept to them minimum duration necessary to accomplish the desired job.
- Access to equipment by non-MBA personnel should be supervised or restricted to prevent inappropriate access to PHI.
- All non-MBA personnel should understand and sign a Second Tier Business Associate Agreement.

SECURING THE PREMISES

- All employees are responsible for closing and locking their window at the end of the day.
- After regular business hours, every employee should confirm that the front door to the office is locked as they leave the building.
- The side door is to remain locked at all times. The Systems Administrator will confirm daily.
- Upon termination of any employee for any cause, the pass code to the front door will be changed.
- The pass code to the front door will only be given to those employees whose schedule necessitates access before or after regular business hours.
- The pass code to the front door is only to be given out by a member of the management team. Any further dissemination is considered misconduct.

WORKSTATION USE

- Computers should be configured so that a screen saver appears when monitors are idle for 15 minutes. A password will be needed to return.

RECORD HANDLING

- Confidential records should not be left in a conspicuous location.
- All employees should pro-actively gather unattended records and return them to a secured area.

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Léo Pomar



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