



National University of Health Sciences General Policies

Title: **HIPAA Physical Safeguards –
Building Managers and Access Control**

Page 1 of 2

Date Adopted: **02/01/18**

Date(s) Revised: 9/29/2020

Date(s) Reviewed: 09/29/2020

President

Date

09/29/2020

POLICY STATEMENT

The following policy addresses physical security of tangible (i.e. paper) PHI on NUHS's premises.

SCOPE

All facilities.

DEFINITIONS

Personnel: Includes, but is not limited to, all employees, medical and clinical staff, business associates, allied health professional staff or students, vendors, volunteers, excluding patients and visitors.

PHI: Individually identifiable health information, including patient demographics, that is created or received by a provider and identifies the person and relates to his or her past, present, or future physical or mental health, treatment, and/or payment, except for information relating to persons who have been deceased for more than fifty (50) years.

Sensitive Information: Data that is proprietary to NUHS and is not intended to be disclosed to the general public.

REGULATORY REFERENCE

45 C.F.R. § 164.310(a).

PROCEDURE

- Paper files containing PHI or Sensitive Information shall be secured by appropriate personnel designated by the HIPAA Security Officer. All paper PHI or Sensitive Information shall be filed in locked cabinets or locked rooms and access to PHI or Sensitive Information shall be authorized by the HIPAA Security Officer on a one-time basis or by job type.
- Access control, validation and facility security shall be managed by persons designated by the HIPAA Security Officer or the Florida HIPAA Security Officer. The following locations and managers are designated below:
 - HEC Clinic – Dr. Erika Hackett
 - Pinellas Park Clinic – Dr. Sarah Kelly
 - Lombard – Dr. Theodore Johnson
 - Salvation Army – Dr. Sonia Joubert
- Managers shall be responsible for access control and policies for their area of responsibility.

POLICY RESPONSIBILITY

HIPAA Security Officer

REVISION

NUHS reserves the right to unilaterally revise, modify, review or alter the terms and conditions of the policy within the constraints of law, with or without reasonable notice.