



DEPARTMENT: Information Systems	POLICY NUMBER: 005
DISTRIBUTION: All Staff	EFFECTIVE DATE: 1/22/2020
SUBJECT: Facility Access Controls	REVISION DATE:

POLICY:

Equinox Inc. shall reasonably safeguard PHI and EPHI from any intentional or unintentional use or disclosure. Equinox Inc. shall protect its facilities where PHI/EPHI can be accessed.

PROCEDURE:

Director of Information Systems Privacy Officer	<ol style="list-style-type: none"> 1. <u>Facility Security Plan.</u> <ol style="list-style-type: none"> (a) Equinox Inc. shall safeguard its facilities and the equipment therein from unauthorized physical access, tampering, and theft. (b) The Director of Information Systems or an appropriate designee shall at least semi-annually audit to ensure PHI/EPHI safeguards are continuously being maintained. (c) When designing a new building and remodeling existing sites, facility managers and/or designees shall work with the Privacy Officer and Director of Information Systems to ensure the facility plan components below are compliant with HIPAA regulations. (d) The following shall be implemented for all sites that access PHI/EPHI: <ol style="list-style-type: none"> 1. <i>Visitor Access Control:</i> In facilities in which PHI/EPHI is available, all visitors shall be escorted and monitored in areas where PHI is not secured. Each site shall implement procedures that govern visitor access controls. These procedures may vary depending on the facility structure, the type of visitors, and where the PHI/EPHI is accessible. 2. <i>Metal/Hard Keys:</i>
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<p>Program Managers</p>	<p>Facilities that use metal/hard keys shall change affected or appropriate key locks when appropriate depending on the situation. In addition, the sites shall have:</p> <ul style="list-style-type: none"> i. Clearances based on programmatic need, special mandated security requirements and workforce member security, as determined by program supervisors; and ii. A mechanism to track which workforce members are provided access. <p>3. <i>Network Closet(s):</i></p> <p>Every network closet shall be locked, whenever the closet is unoccupied or not in use, or shall be enclosed in a locked equipment cage. Equinox Inc. shall periodically change the locking mechanism to these closets.</p> <p>4. <i>Server Room(s):</i></p> <p>Every server room shall be locked whenever the room is unoccupied or not in use, or shall be enclosed in a locked equipment cage. Equinox Inc. shall document who has access to each server room and periodically change the locking mechanism to server rooms.</p> <p>5. <i>Doors:</i></p> <p>Doors should be checked for locked status at night, as should doors to record rooms, chart storage cabinets and file cabinets.</p> <p>6. <i>Locks:</i></p> <ul style="list-style-type: none"> i. Where possible, all records will be kept in a locked storage file or file cabinet when not in use. All records of discharged individuals will be stored in a locked record room with limited access. Only those individuals who need PHI to perform their job duties will have access to these areas. ii. Where possible, record rooms, chart storage cabinets, and file cabinets maintaining protected health information must be locked at night. Such rooms and cabinets must be locked during the day when not supervised by authorized personnel. If a chart is needed from the chart storage area, authorized personnel should be informed.
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Director of Information Systems	2. <u>Contingency Operations - Access to Sites.</u> Coverage schedules allow for emergency coverage for all sites.
Director of Facilities	3. <u>Maintenance Records.</u> Repairs or modifications to the physical building for each site where PHI/EPHI can be accessed shall be logged and tracked. The log shall include at a minimum events that are related to security (for example, repairs or modifications of hardware, walls, doors, and locks).