

**Lifespan Corporation Policy**

**Subject:**

Media Re-Use Policy

**File Under:**

HIPAA Security

**Issuing Department(s):**

Information Services

**Latest Revision Date:**

July 29, 2015

**Last Review Date:**

July 2015

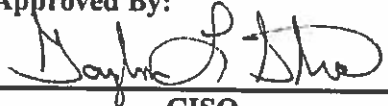
**Original Policy Date:**

October 14, 2014

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**Approved By:**

  
CISO

  
SVP & CIO

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## Media Re-Use Policy

### Introduction

Lifespan has adopted this Media Re-Use Policy in order to recognize the requirement to comply with the Health Insurance Portability and Accountability Act ("HIPAA"), as amended by the Health Information Technology for Economic and Clinical Health ("HITECH") Act of 2009 (Title XIII of division A and Title IV of division B of the American Recovery and Reinvestment Act "ARRA") and the HIPAA Omnibus Final Rule (Effective Date: March 26, 2013). We acknowledge that full compliance with the HIPAA Final Rule is required by or before September 23, 2013.

Lifespan hereby acknowledges our duty and responsibility to protect the privacy and security of Individually Identifiable Health Information ("IIHI") generally, and Protected Health Information ("PHI") as defined in the HIPAA Regulations, under the regulations implementing HIPAA, other federal and state laws protecting the confidentiality of personal information, and under principles of general and professional ethics. We also acknowledge our duty and responsibility to support and facilitate the timely and unimpeded flow of health information for lawful and appropriate purposes.

### Scope of Policy

This policy governs the Re-Use of Information Storage Media for Lifespan. All personnel of Lifespan must comply with this policy. Demonstrated competence in the requirements of this policy is an important part of the responsibilities of every member of the workforce.

Officers, agents, employees, Business Associates, contractors, affected vendors, temporary workers, and volunteers must read, understand, and comply with this policy in full and at all times.

### Assumptions

- Lifespan hereby recognizes its status as a Covered Entity under the definitions contained in the HIPAA regulations.

- ❑ Lifespan must comply with HIPAA and the HIPAA implementing regulations pertaining to media disposal and disposition, in accordance with the requirements at § 164.310(d)(1-2).
- ❑ Media containing individually identifiable health information, including Protected Health Information ("PHI", as defined by HIPAA), must be completely erased or sanitized ("wiped") before any re-use of such media may take place, or the data residing on such media is subject to corruption, compromise, or loss.

### **Policy Statement**

- ❑ It is the Policy of Lifespan to properly erase and or sanitize ("wipe") all media containing individually identifiable health information, including Protected Health Information ("PHI", as defined by HIPAA), before any media may be re-used.
- ❑ It is the Policy of Lifespan to not 'gift' or sell any Lifespan computerized equipment including but not limited to computers, tablets, telephones, pagers or other electronic items that have storage capabilities with the exception of the following:
  - Computerized devices purchased with grant funds that may be eligible for use outside of Lifespan when a research project has terminated or transferred. It is important to note that when any grant equipment is purchased, OS media will need to be purchased at the time the order is placed if the equipment will ever leave the Lifespan campus. This media will be provided to the user when the equipment is delivered. It is the responsibility of the user to retain this media as it will need to be used to restore the equipment to its original state. When equipment is returned, it will be returned in a completely wiped state with no operating system or programs installed. Under no circumstances will Lifespan equipment leave with the Lifespan enterprise operating system or related software installed.
- ❑ Responsibility for proper media re-use shall reside with Office of the CISO, who shall develop procedures to ensure the proper disposition of all such media before any re-use.
- ❑ It is the Policy of Lifespan to fully document media re-use and disposition-related activities and efforts, in accordance with the Lifespan Documentation Policy.

### **Procedures**

- ❑ A device is defined as, but not limited to, personal computers, servers, laptops/notebooks, fax machines, copy machines, smart phones and/or tablets.
- ❑ Storage media is defined as, but not limited to, disk drives, tapes, CD's/DVD's and USB memory sticks.
- ❑ Any device or storage media that contains PHI, confidential or sensitive information will be erased by appropriate means before re-use. If information cannot be erased, then the device or storage media should be destroyed as outlined in the Media Disposal Policy.

### **Compliance and Enforcement**

All managers and supervisors are responsible for enforcing this policy. Employees who violate this policy are subject to discipline up to and including termination in accordance with Lifespan's Sanction Policy.