#### **BAYSTATE HEALTH SYSTEM**

### **HIPAA Security**

### **Addressable Implementation Specifications**

~ Decision Table ~

If the implementation specification is inappropriate and/or unreasonable, implement an alternate measure that accomplishes the same end as the addressable implementation specification. In cases where we meet the standard through an alternate measure, document:

			22.22			
ADMINISTRATIVE SAFEGUARDS	Addressable = Required =	(A) (R)	Is the addressable implementation specification reasonable and/or appropriate? If yes, then implement the implementation specification	the decision not to implement the addressable implementation specification,	the rationale behind that decision and	the alternative safeguard implemented to meet the standard.
Security Management Process	Risk Analysis	(R)				
	Risk Management	(R)				
	Sanction Policy	(R)				
	Information System Activity Review	(R)				
Assigned Security Responsibility		(R)				
Workforce Security	Authorization and/or Supervision	(A)	YES Access Control & Supervision	N/A	N/A	N/A
	Workforce Clearance Procedure	(A)	YES Policies & Procedures	N/A	N/A	N/A
	Termination Procedures	(A)	YES Termination Report	N/A	N/A	N/A
Information Access Management	Isolating Health care Clearinghouse Function	(R)				
	Access Authorization	(A)	YES Policies & Procedures	N/A	N/A	N/A
	Access Establishment and Modification	(A)	YES Policies & Procedures	N/A	N/A	N/A
Security Awareness and Training	Security Reminders	(A)	YES	N/A	N/A	N/A
	Protection from Malicious Software	(A)	YES	N/A	N/A	N/A
	Log-in Monitoring	(A)	To be determined	To be determined	To be determined	To be determined

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	Password Management	(A)	YES	N/A	N/A	N/A
Security Incident Procedures	Response and Reporting	(R)				
Contingency Plan	Data Backup Plan	(R)				
	Disaster Recovery Plan	(R)				
	Emergency Mode Operation Plan	(R)				
	Testing and Revision Procedure	(A)	YES	N/A	N/A	N/A
	Applications and Data Criticality Analysis	(A)	YES	N/A	N/A	N/A
Evaluation		(R)				
Business Associate Contracts and Other Arrangement	Written Contract or Other Arrangement	(R)				

#### PHYSICAL SAFEGUARDS

Facility Access Controls	Contingency Operations	(A)	YES	N/A	N/A	N/A
	Facility Security Plan	(A)	YES FOR FACILITY, BUT ????? FOR EQUIPMENT	To be determined	To be determined	To be determined
	Access Control and Validation Procedures	(A)	YES	N/A	N/A	N/A
	Maintenance Records	(A)	To be determined	To be determined	To be determined	To be determined
Workstation Use		(R)				
Workstation Security		(R)				
Device and Media Controls	Disposal	(R)				
	Media Re-use	(R)				
	Accountability	(A)	To be determined	To be determined	To be determined	To be determined
	Data Backup and Storage	(A)	YES	N/A	N/A	N/A

# BAYSTATE HEALTH SYSTEM HIPAA Security

# Addressable Implementation Specifications ~ Decision Table ~

#### **TECHNICAL SAFEGUARDS**

Access Control	Unique User Identification	(R)				
	Emergency Access Procedure	(R)				
	Automatic Logoff	(A)	YES	N/A	N/A	N/A
	Encryption and Decryption	(A)	To be determined	To be determined	To be determined	To be determined
Audit Controls		(R)				
Integrity	Electronic Protected Health Information	(A)	To be determined	To be determined	To be determined	To be determined
Person or Entity Authentication		(R)				
Transmission Security	Integrity Controls	(A)	To be determined	To be determined	To be determined	To be determined
	Encryption	(A)	To be determined	To be determined	To be determined	To be determined