

**[MTSO]  
HEALTH INSURANCE PORTABILITY  
AND ACCOUNTABILITY ACT (HIPAA)**

**PRIVACY RULE  
POLICIES, PROCEDURES, AND FORMS  
FOR BUSINESS ASSOCIATES**

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**[MTSO]**  
**HIPAA PRIVACY POLICY**

Original Date: \_\_\_\_\_  
Revision Date: \_\_\_\_\_  
Version: \_\_\_\_\_  
Approved By: \_\_\_\_\_  
Review Date: \_\_\_\_\_

**SUBJECT:** Safeguarding Patient Information

**HIPAA CITES:** 45 CFR § 164.504(e)(2)(ii)(C)

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**I. POLICY**

It is the policy of [MTSO] ("[MTSO]") to safeguard the privacy of the Protected Health Information received by [MTSO] customers. As a result, [MTSO] has adopted administrative, technical and physical safeguards to protect the privacy of Protected Health Information.

**II. PROCEDURES**

- A. Whenever possible [MTSO] employees who use Protected Health Information in paper form will discard such information after use. [MTSO] employees who discard Protected Health Information shall shred paper copies of such information prior to discarding.
- B. Where paper copies of Protected Health Information must be stored or kept on [MTSO] premises, such information shall be stored in locked cabinets. Access to such cabinets will be limited to employees who require access to perform their job duties.
- C. Where Protected Health Information is stored by [MTSO] on electronic media, access to such information shall be limited to employees who require access to perform their job duties. Electronic Protected Health Information shall be protected with reasonable technical security measures, such as firewalls and passwords. See [MTSO]'s HIPAA Security Policies and Procedures for further information.
- D. Where [MTSO] subcontracts for services and [MTSO] subcontractors have access to Protected Health Information, [MTSO] will require that each subcontractor has procedures in place to reasonably safeguard Protected Health Information.
- E. [MTSO] employees shall safeguard all Protected Health Information both in paper and in Electronic Media by ensuring that access to [MTSO] premises is secure. [MTSO] premises shall remain locked after business hours and access to the premises is limited to \_\_\_\_\_.