



Oklahoma State University

Title: Implementation Specifications	Policy #: SEC-00.04
Category: HIPAA Compliance	Authority: 45 CFR § HIPAA SECTION: 164.306(d)
Standard: Security Standards for the protection of PHI	Responsibility: Health Care Components
Effective Date: 4/20/2005	Page 1 of 2
Approved By: OSU Legal Counsel	Revised: 7/1/2013

PURPOSE:

To establish the method of how OSU will implement the required and addressable implementation specifications within the security rule.

POLICY:

Implementation specifications are either required or addressable. *§164.306(d)(1)*

- When a standard adopted in §164.308, §164.310, §164.312, §164.314, or §164.316 includes required implementation specifications, OSU must implement the specified implementation specifications. *§164.306(d)(2)*
- When a standard adopted in §164.308, §164.310, §164.312, §164.314, or §164.316 includes addressable implementation specifications, OSU must: *§164.306(d)(3)*
 - o Assess whether each implementation specification is a reasonable and appropriate safeguard in its environment, when analyzed with reference to the likely contribution to protecting electronic PHI; and *§164.306(d)(3)(i)*
 - o As applicable to OSU:
 - Implement the implementation specification if reasonable and appropriate; or *§164.306(d)(3)(ii)(A)*
 - If implementing the implementation specification is not reasonable and appropriate *§164.306(d)(3)(ii)(B)*
 - Document why it would not be reasonable and appropriate to implement the implementation specification; and *§164.306(d)(3)(ii)(B)(1)*
 - Implement an equivalent alternative measure if reasonable and appropriate. *§164.306(d)(3)(ii)(B)(2)*
- OSU must review and modify the security measures implemented under the Security Rule as needed to continue provision of reasonable and appropriate protection of electronic PHI, and update documentation of such security measures in accordance with §164.316(b)(2)(iii). *§164.306(e)*

PROCEDURE:



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1. OSU will implement a policy and procedure on every required and addressable Security Implementation Standard.
2. For the addressable standards, OSU will follow the policy as stated above, and document the reasonable and appropriate steps whatever they may be and implement those steps that OSU has found appropriate.
3. OSU will review and modify as necessary all security measures on no less than an annual basis, and will document all changes to policy and procedures.