



Oklahoma State University

Title: Access Control & Validation	Policy #: SEC-09.03
Category: HIPAA Compliance	Authority: 45 CFR § 164.310(a)(2)(iii) HIPAA SECTION:
Standard: Facility Access Controls	Responsibility: Health Care Components
Effective Date: 4/20/2005	Pages: Page 1 of 1
Approved By: OSU Legal Counsel	Revised: 7/1/2013

PURPOSE:

Maintain records of distributed keys.

POLICY:

OSU will implement procedures to control and validate a person's access to facilities based on their role or function, including visitor control, and control of access to software programs for testing and revision.
§164.310(a)(2)(iii)

PROCEDURE:

In order to receive a key/access card, employees must complete the Key Requisition Form located on the [OSU CHS Centernet web page](#). This form must be approved by the department supervisor and Physical Plant Director.

Keys must be returned to physical plant at termination, transfer, or change in job function.

Keys or Access Cards will only be distributed to authorized personnel and must be approved prior to release of keys/cards.

Physical access to areas containing ePHI (data centers) must be approved by the CHS HIPAA Compliance Office and by the Information Technology Department.

Most software companies do not track access to PHI within test systems. Therefore, access to test systems that contain PHI will be limited to IT, HIT staff, and those deemed necessary to test the software and its functions. Staff may have access to a test system as long as the data within the system is all test data and not real PHI.

Visitors, which might be an auditor or a vendor, which need access to the various systems may use a service account. It shall be documented by the department which the visitor is visiting which service account was used, and the name of the visitor. If a visitor is in need of a key or access card, the department will arrange for such access with the appropriate OSU staff.