



Oklahoma State University

Title: Accountability–Tracking Equipment and Media Movement	Policy #: SEC-11.02
Category: HIPAA Compliance	Authority: 45 CFR HIPAA SECTION: § 164.310(d)(2)(iii)
Standard: Device & Media Controls	Responsibility: Health Care Components
Effective Date: 4/20/2005	Page 1 of 2
Approved By: OSU Legal Counsel	Revised: 7/1/2013

PURPOSE:

Define procedures for tracking the movement of electronic media and equipment in order to comply with Federal and state statutes regarding the privacy and confidentiality of medical, financial, research, and personnel information.

POLICY:

OSU will maintain a record of the movements of hardware and electronic media and any person responsible therefore. *§164.310(d)(2)(iii)*

Electronic media and equipment must often be moved due to office relocation, equipment upgrades, vaulting of media for disaster recovery, and other issues. A paper and/or electronic log specifying the location of the device is to be maintained at all times.

PROCEDURE:

The physical movement of such items is to be coordinated through the Information Technology Department. They will be responsible for maintaining a log, either electronic or paper, tracking the movement of electronic media and equipment, including software. This log will also identify the individuals who have access to such media and equipment once the item(s) have moved.

To facilitate the maintenance of the tracking log, all movement of media and equipment must be coordinated through the Information Technology Department.

Individuals are forbidden to remove any equipment from their offices or the campus, unless explicitly approved by his/her supervisor and the HIPAA Compliance Office. The data and equipment are OSU property and no employee is entitled to it for personnel use.

If an individual moves to another position within the University, the equipment will not move with him/her, unless explicitly approved by the supervisor, IT and HIPAA Compliance Office.



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The HIPAA Compliance Office will create a tracking template for use across all campuses. Copies of the logs must be filed with the compliance officer at least quarterly.

REFERENCE:

- Disposal and Re-use of Electronic Media
- Employee Termination Procedures
- Personnel Security Policy and Procedure
- Physical Access Control Policy and Procedure
- Application Archives
- Electronic Backups