

Device and Media Controls

October 2024

I. Supporting Policies for this Information Paper:

- a. DoD 8580.02 Security of Individually Identifiable Health Information in DoD Health Care Programs, August 12, 2015
- b. NIST Special Publication 800, NIST SP 800-66r2, Implementing the Health Insurance Portability and Accountability Act (HIPAA) Security Rule, February 2024

II. Definitions Associated with Device and Media Controls

- a) **Electronic Media:** Includes memory devices in computers (e.g., hard disks, memory chips) and any removable or transportable digital memory medium, such as magnetic tape or disks, optical disks, digital memory cards, or transmission media used to exchange information already in electronic storage media. Transmission media include, for example, the internet, the extranet, leased lines, dial-up lines, private networks, and the physical movement of removable or transportable electronic storage media. Traditional paper-to-paper facsimile is not included; however, electronic data transmitted using a computer-based facsimile program is included.
- b) **ePHI:** Individually identifiable health information that is created, received, maintained, or transmitted in electronic form by a covered entity or business associate. ePHI does not include individually identifiable health information in paper or oral form.
- c) **Physical safeguards:** Physical measures, policies, and procedures to protect an organization's electronic ISs and related buildings and equipment from natural and environmental hazards and unauthorized intrusion.

III. Guidance Regarding Device and Media Control

A. Covered Entities must implement policies and procedures that govern the receipt and removal of hardware and electronic media that contain ePHI into and out of the facility, and the movement of these items within the facility.

- (1) Disposal. Implement policies and procedures to address the final disposition of ePHI, and the hardware or electronic media on which it is stored in accordance with DoD Component-authorized record disposition authorities.
- (2) Media Re-use. Implement procedures for removal of ePHI from electronic media before the media are made available for re-use.
- (3) Accountability. Maintain a record of the movements of hardware and electronic media and any person responsible for such hardware and media.
- (4) Data Backup and Storage. Create a retrievable, exact copy of ePHI, when needed, before movement of equipment.

B. Key Activities, descriptions, and sample questions

Key Activities	Description	Sample Questions
Implement Methods for the final Disposal of PHI	<ul style="list-style-type: none"> • Determine and document the appropriate method for disposing of hardware, software, and data • Ensure ePHI is properly destroyed and can not be recreated • Implement policies and procedures to address disposition of ePHI 	<ul style="list-style-type: none"> • What ePHI is created, stored, processed, and transmitted by the organization? On what media is it located? • Is data stored on removable, reusable media (e.g., flash drives, Secure Digital [SD] memory cards)? • Are policies and procedures developed and implemented that address the disposal of ePHI and/or the hardware and media on which ePHI is stored? • Is there a process for destroying data on all media? • What are the options for disposing of data on hardware? What are the costs? • Prior to disposal, have media and devices containing ePHI been sanitized in accordance with authorized record disposition regulations.



<p>Develop and Implement procedures for re-use of electronic media</p>	<ul style="list-style-type: none">• <i>Implement procedures for the removal of ePHI from electronic media before the media become available for reuse.</i>• Ensure that ePHI previously stored on any electronic media cannot be accessed and reused.• Identify removable media and their uses.• Ensure that ePHI is removed from reusable media before they are used to record new information.	<ul style="list-style-type: none">• Do policies and procedures already exist regarding the reuse of electronic media (i.e., hardware and software)?• Have reused media been erased to the point where previous ePHI is neither readily available nor recoverable?• Is one individual and/or department responsible for coordinating the disposal of data and the reuse of the hardware and software?• Are workforce members appropriately trained on the security risks to ePHI when reusing software and hardware?¹⁰
<p>Maintain accountability for hardware and electronic media</p>	<ul style="list-style-type: none">• Maintain a record of the movements of hardware and electronic media and any person responsible for them.• Ensure that ePHI is not inadvertently released or shared with any unauthorized party.• Ensure that an individual is responsible for and records the receipt and removal of hardware and software with ePHI.	<ul style="list-style-type: none">• Have policies and procedures been implemented that govern the receipt and removal of hardware and electronic media that contain ePHI into and out of a facility and the movement of these items within the facility?• Has a process been implemented to maintain a record of the movements of and persons responsible for hardware and electronic media that contain ePHI?• Where is data stored (i.e., what type of media)?• What procedures already exist to track hardware and software within the organization (e.g., an enterprise inventory management system)?• If workforce members are allowed to remove electronic media that contain or may be used to access ePHI, do procedures exist to track the media externally?• Who is responsible for maintaining records of hardware and software?



Develop Data Backup and Storage Procedures	<ul style="list-style-type: none">• <i>Create a retrievable exact copy of ePHI, when needed, before movement of equipment.</i>• Ensure that an exact retrievable copy of the data is retained and protected to maintain the integrity of ePHI during equipment relocation.	<ul style="list-style-type: none">• Has a process been implemented to create a retrievable, exact copy of ePHI when needed and before the movement of equipment?• Are backup files maintained off-site to ensure data availability in the event that data is lost while transporting or moving electronic media that contain ePHI?• If data were to be unavailable while media are transported or moved for a period of time, what would the business impact be?

*If you have any questions about any of the information above, please contact the DHA PCLO at:
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