

**Policy 8**  
**Facility Access Controls Policy**

1. Contingency Operations

In the event of a disaster, certain individuals must have access to the facility to minimize losses and restore data.

These individuals may need access after normal working hours. It is the responsibility of the Security Officer to determine those individuals who will need access to the facility in the event of a disaster and provide appropriate keys, codes, etc. to allow for such access.

2. Facility Security Plan/Access Control and Validation

It is the responsibility of the Security Officer to determine which employees need access to the facility after hours (e.g., the office suite) and which employees need special access to locked equipment rooms, etc. Lists of individuals with such access will be maintained by the Security Officer.

If an employee with special access to the facility is terminated, the Security Officer should take steps to ensure that keys or key cards are obtained prior to termination or keys and codes changed if deemed necessary.

3. Visitor Control

Access points to areas with access to electronic health information will be locked or monitored. All visitors (e.g., drug reps, repairmen, etc.) will be asked to sign a visitor sign in sheet and will be given a visitor badge when present in the facility. These individuals will not be permitted to have access to electronic protected health information. Any employee witnessing a visitor attempting to gain access to electronic protected health information should immediately report such activity to the Security Officer, or other such person appointed by the Security Officer.

4. Maintenance Records

The Security Officer will be responsible for overseeing documentation of any maintenance that is performed on the facility that would relate to security of the facility. Some of the items that should be documented include, without limitation:

- Repair or replacement of doors, windows, walls or locks within the facility

If these responsibilities are delegated to a landlord or other outside party, the basis for the inapplicability of this specification will be documented by the Security Officer.

**Explanation of the Facility Access Controls Standard and Instructions for Utilizing the  
Facility Access Controls Policy**

The Facility Access Controls Standard requires covered entities to implement policies and procedures to limit physical access to electronic information systems, as well as the facilities in which the systems are housed. In addition, this standard requires the covered entity to ensure that properly authorized access is allowed. For purposes of the Security Rule, “facility” is defined as “the physical premises and interior and exterior of a building(s).”

The Facility Access Controls Standard has four implementation specifications. Policy 8 is a sample policy addressing all of these implementation specifications.

*a. Contingency operations*

The first implementation specification is “Contingency operations”. This specification involves the establishment of policies and procedures which would allow appropriate access to the facility in the event of an emergency so that the disaster recovery plan and the emergency mode operations plan can be carried out to restore lost data. For example, certain employees may need after-hours access in the event of an emergency. If there is an off-site location that houses electronic information critical to contingency operations, certain employees may also need access to that location.

*b. Facility security plan*

“Facility security plan” is the next implementation specification. A facility security plan involves the implementation of policies and procedures to safeguard the building, or part of a building, where your organization does business and the equipment contained in these buildings from the following:

- unauthorized access,
- tampering,
- and theft.

This includes basic safeguards, such as locking the doors and windows, and other safeguards such as camera monitoring of areas that contain electronic protected health information. If your practice leases a building, it may be the landlord’s or security company’s responsibility to provide certain safeguards. Even though the landlord or security company is undertaking these safeguards, they should be documented in your organization’s facility security plan.

*c. Access control and validation procedures*

The third addressable implementation specification under the facility access controls standard is “Access control and validation procedures.” This specification is very similar to the access authorization specification under the administrative safeguards category.

When your practice makes determinations related to which members of the workforce need access to electronic protected health information based upon job description, a determination should also be made regarding access to the facility itself, including specific rooms where electronic protected health information is housed. For example, a determination should be made as to which employees require keys to the office and, if there are locked rooms housing computer servers, etc., a determination should be made as to which employees should have access to those locked rooms.

Your practice should also implement policies and procedures regarding visitor control, such as requirements for visitor sign-in sheets or supervision.

*d. Maintenance records*

The final addressable implementation specification under this standard is “Maintenance records”. This specification would include the implementation of policies and procedures to document those repairs or modifications performed on facility components that are related to physical security. For example, your organization should keep a log of repairs or modifications made to computer hardware and the components of the building that provide security protection, such as locks, doors, and walls. Again, this may be the responsibility of a landlord. In such a circumstance, you should document why the specification is inapplicable (e.g., the responsibility for maintenance is the contractual obligation of the landlord).