Policy Number: HC-24	Page: 1	Of: 1
Title: Annual Security Evaluation		
Regulatory Authority: HIPAA Regulations, FERPA Regulations, ORC, OAC		
Effective Date: 01/19/2021		
Reviewer/Job Title: Director of Operations		

(A) ANNUAL SECURITY EVALUATION

Annually the HIPAA Privacy/Security Officer shall conduct a technical evaluation of the board's security policies and procedures, including a revised risk assessment, and update policies as necessary in response to environmental or operational changes affecting the security of electronic protected health information.

Audience

Hipaa privacy/security officer

Authority

HIPAA Privacy and Security Rules, 45 CFR Part 164; 164.308(a)(8)

ORC § 5123:2-1-02(I) County Board Administration, Records, Annual Review of Safeguards

1) **Annual Review of Regulations, Statutes, and Technological Issues to Update Security Policies.** On an annual basis, the HIPAA Security Officer will review any updates to federal HIPAA regulations, other applicable federal and/or state statues, and technological issues and update the organization's security policies as appropriate. This review may be conducted internally, or upon the HIPAA Security Officer's recommendation and approval by the superintendent and/or board, contracted to an outside firm.
   a) Standards and Measurements shall first be developed as the basis for the evaluation. These may include checklists, interviews with personnel, penetration testing, and review of required documentation. The evaluation design should evaluate compliance with current HIPAA Security requirements.
   b) The evaluation shall be conducted and the results documented. Weaknesses should be identified and any recommendations prepared.
2) **Report and Recommendations.** The HIPAA Security Officer shall submit their report to the Superintendent and/or Board including any recommendations.
3) **Documentation of Review.** The results of the review will be documented, and documentation shall be retained for 6 years.
4) **Additional Security Evaluation with the Introduction of New Technology.** A security evaluation should additionally be conducted with the introduction of new technology, such as wireless access, instant messaging, new smartphones etc., in response to newly recognized risks, or other event which would likely impact overall system security.