

South Dakota Department of Human Services

DHS Safeguard Assessment Tool

This **Safeguard Assessment Tool** is intended to help DHS Administrators and Directors or their designee to conduct a self-assessment of whether confidential information is protected by reasonable administrative, technical and physical safeguards. This tool is intended to be used with the **DHS 2099** “Guidance for Administrative, Technical and Physical Safeguards for Protected Health Information (PHI)”.

Office, Program or Facility Assessed:	_____
Location Address:	_____
Name of Person Conducting Assessment:	_____
Date of Assessment:	_____

Instructions: Circle the response that best describes your environment.

A-Physical Environment

	Less secure		More secure	
Program/Facility is shared with other organizations.	Shared with non-DHS entity	<input type="radio"/>	Shared with other DHS programs	<input type="radio"/>
DHS controls the program/facility.	Telecommuting or out stationed site	<input type="radio"/>		<input type="radio"/>
The floor plan of the work area includes lockable offices.	Open floor plan	<input type="radio"/>	Mixed	<input type="radio"/>
The overall physical security of the office/facility (locks, lighting, doors, etc.) is:	Basic or flawed	<input type="radio"/>	Good	<input type="radio"/>

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B-Reception

	Less secure			More secure		
The front door is locked or has a live security guard during business hours.	No	o	Usually	1	Always	2
We have a policy requiring ID to enter this office.	No	o			Yes	2
The reception area is shared between several programs.	Shared reception for several programs.	o			Single reception area for each program.	2
The receptionist is on duty when the front door is unlocked.	No	o	Usually	1	Always	2
The reception and work areas are separated.	Not separated	o	Separated by passageway or unlocked door	1	Separated by locked (buzzer) door	2

C-Pedestrian Traffic

	Less secure			More secure		
Clients/patients or other visitors can enter work areas where confidential information is used or stored.	Can wander freely through offices	o	If on business, usually escorted	1	Not allowed in secure areas at all	2
Policies require employees to use reasonable measures, such as speaking in a soft voice about confidential issues when in public areas.	No	o	Some policies exist	1	Yes, policies are detailed and clear	2
Contractors such as janitorial service, maintenance, computer services, and food vendors can enter work areas.	Can enter office on their own, as after hours	o	Sometimes unaccompanied in office	1	Never in office except when accompanied	2
Contractors are required to complete a confidentiality agreement.	Not usually	o	Usually	1	Always	2
Employees can enter and leave after hours.	Yes, without restriction	o	Yes, with sign-in or other controls	1	No, except as authorized by management	2

D-Document Storage

	Less secure			More secure		
Most files are kept in a separate, lockable room or vault.	No	o	Sometimes	1	Always	2
Policy defines which employees are permitted to enter the file room or vault.	No	o	Yes, but may not always be followed	1	Always	2

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File cabinets are locked when not in use.	No	0	Sometimes	1	Always	2
Unlocked file cabinets are located where an unauthorized person could open them and access files.	Yes	0			No	2
Policy prohibits unauthorized persons from viewing files in unlocked file cabinets.	No	0			Yes	2
Paper records are visible on desktops, work tables etc.	Yes	0	Sometimes	1	Never except when being used	2
Policy prohibits employees from leaving confidential information on desktops, work tables, etc.	No	0			Yes	2

E-Document Destruction

	Less secure			More secure		
We have procedures and practices for shredding of documents that contain confidential information.	No	0	Sometimes	1	Yes	2
Does this location have a document shredder(s)?	No	0	Yes, but it is not always used	1	Yes, and heavily used	2
Does this location have an outside company remove and destroy confidential materials?	No	0	Yes, but not sure of quality	1	Yes, a high-quality firm	2
Does this location have locked confidential document storage containers?	No	0	Yes, but it is not always used	1	Yes, and heavily used	2
Are confidential documents ever discarded in ordinary trash?	Frequently	0	Sometimes	1	Never	2

F-Electronic Media Storage

	Less secure			More secure		
Tapes, disks, and cartridges are kept in a locked cabinet or room.	No	0	Sometimes	1	Always	2
Policies define which employees are permitted to enter secure data areas.	No	0			Yes	2
Policies and procedures prohibit removing confidential data from the office except as authorized.	No	0	Yes in theory but maybe not in practice.	1	Yes	2

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G-Workstations and Fax

	Less secure			More secure	
The office has reasonable physical safeguards, such as partitions or client interview rooms, to prevent unauthorized viewing of screens.	No	0	Some are.	1	Yes, all are.
All applications that contain confidential information require at least password security.	No	0	Some	1	Yes, all are.
Policy requires that employees exit applications or systems that have confidential information when leaving their workstations.	No	0	Yes in theory but maybe not in practice.	1	Yes
All screens time out automatically.	No	0	Some	1	Yes
Confidential information is sent by e-mail.	Yes	0	Sometimes	1	Never
Fax machines located away from public areas to avoid inadvertent access.	No	0	Yes, but not secure	1	Yes, in secure area
Policies govern verification of fax recipients, confirmation of receipt, and distribution of incoming faxes.	No	0	Some	1	Yes
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Subtotals	Number of Responses above x 0	0	Number of Responses above x 1		Number of Responses above x 2
TOTAL					Add subtotals above:

Scoring: 0-36 indicates few meaningful safeguards. 37-54 suggests that reasonable safeguards are in place for a typical client/patient service organization. 55-72 suggests that strong safeguards are in place. These guidelines are only approximate. More stringent guidelines may be appropriate for highly sensitive information and offices/facilities that provide direct service to the public.

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DHS Safeguard Plan

Office, Program or Facility Assessed:	_____
Location Address:	_____
Name of Person Conducting Assessment:	_____
Signature:	Date of Assessment:

In each section, please describe the steps you will take to improve your work environment.
If you are not going to make any changes to your current safeguards, please explain.
If more space is required please attach additional pages. Please be sure to indicate the section.

B-Reception

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F-Electronic Media Storage

G-Workstations and Fax
