Policy Management Policy

The Security Officer and Privacy Officer are responsible for maintaining policies and procedures and assuring all workforce members, business associates, customers, and partners are adherent to all applicable policies. Additionally, they may include or delegate this responsibility by formin a compliance team. Regardless, they remain ultimately responsible for all aspects of policy management. Previous versions of polices are retained to assure ease of finding policies at specific historic dates in time by using our private, GitHub version control repository.

Applicable Standards from the HITRUST Common Security Framework

- 12.c - Developing and Implementing Continuity Plans Including Information Security

Applicable Standards from the HIPAA Security Rule

- 164.316(a) - Policies and Procedures
- 164.316(b)(1)(i) - Documentation

Maintenance of Policies

1. All policies are stored and up-to-date to maintain compliance with HIPAA, HITRUST, NIST, and other relevant standards. Updates and version control is done using our GitHub repository. Only members of the compliance team can accept and update company policy changes.
2. Policy update requests can be made by any workforce member at any time. Furthermore, all policies are reviewed annually by both the Security and Privacy Officer to assure they remain accurate and up-to-date.
3. Edits and updates made by appropriate and authorized workforce members are done on their own versions or branches. These changes are only merged back into final, or master, versions by the Privacy or Security Officer, similar to a pull request. All changes are linked to workforce personnel who made them and the Officer who accepted them.
4. All policies are made read-only accessible to all workforce members.
5. All policies, and associated documentation, are retained for 6 years from the date of its creation or the date when it last was in effect, whichever is later.
   1. Version history of all policies is done via Github.

2. Backup storage of all policies in PDF format is done with Google Drive.
6. During annual review, issues that come up as part of this process are reviewed by management to assure all risks and potential gaps are mitigated and/or fully addressed.
7. We always comply with HIPAA, but also include the HighTrust MyCSF Framework to ensure higher standards were possible.

Additional documentation related to maintenance of policies is outlined in the Security Officer's responsibilities.

Note: The policy review form can be found [here](#).