



Canon Medical Systems USA, Inc.

ePHI Removal Policy

In keeping with the widespread advancement of Information Technology (IT) within the medical imaging industry, Canon Medical Systems USA, Inc. recognizes the importance of the protection of Patient Health Information (PHI).

PHI is any information about health status, provision of health care, or payment for health care that can be linked to a specific individual. This can be the patient's name, accession number, PatientID or any discernable information that can be linked to a specific individual.

To comply with the Health Insurance Portability and Accountability Act (HIPAA), Canon Medical Systems, acting as a Business Associate¹, has an obligation and responsibility to our customers to properly dispose any media that contains PHI in a safe manner. Media can be Hard Drives (HDD), USB, CD's, or parts that contain any PHI. If it is unknown if media contains PHI, the employee of Canon Medical Systems is to assume PHI is present and follow Canon Medical Systems policy for removal.

Canon Medical Systems USA is responsible for safeguarding PHI and prevention of improper disclosure of PHI that is in our possession in any form. Canon Medical Systems may come into contact with PHI during service, Sales Presentations, and deinstallation of equipment. In the event that the facility provides media to Canon Medical Systems for non-routine service issues, it is the facilities responsibility to ensure that all PHI has been properly removed and not recoverable. If the facility is unable to properly remove or determine if PHI is present, or if the facilities requests, Canon Medical Systems, for a fee, will provide PHI removal services.

For some systems, Canon Medical Systems will use a mirroring program to backup the system state. This backup is used in cases where a software restoration is required such as software catastrophes. This backup may contain PHI. Canon Medical Systems will use care to store this backup in a safe location provided by your facility. If it is decided to not use this quick recovery method, please communicate to your local Canon Medical Systems customer engineer or email CybersecurityRiskManagement@us.medical.canon

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At any time, a Canon Medical Systems customer can request the HDD, solid state memory device (thumb drive), CD, or any media that contain PHI to be provided to them free of charge. The customer can then assume the responsibility of disposing the media that contains PHI. This can be requested for the following:

- **Sales presentation** When Canon Medical Systems is responsible for a demo using PHI from a facility, most commonly used in Ultrasound presentations.
- **Removal of systems** Applicable when Canon Medical Systems is responsible for the removal of any installed equipment.
- **Failure of media** If any media, most common will be a HDD failure (system drive, HDD, RDD, etc.), fails or degrades and requires replacement.
- **System Upgrade** If media is replaced during a system upgrade.
- **Creation of USB, DVD, or CD** If Canon Medical Systems creates PHI on media such as USB, DVD, or CD (i.e., copies patient images onto a CD to be imported to PACS).
- **Mobile or temporary installation** If Canon Medical Systems is responsible for a Mobile device or has a temporary installation, most commonly during an installation of another unit at a facility.

Contact Canon Medical Systems security

Please email CyberSecurityRiskManagement@us.medical.canon with any questions or concerns.

Reference

<http://www.hhs.gov/ocr/privacy/hipaa/understanding/coveredentities/businessassociates.html>

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