I. PURPOSE:
The purpose of this policy is to define responsibilities of individuals
assigned to implement and assure ongoing compliance & enforcement of the
Security Rule.

II. POLICY:
The designated Affiliated Covered Entity (ACE) Information Security Official
will be responsible and accountable for the development and implementation of
the policies and procedures required by the Security Rule.

III. DEFINITIONS: See document “SECURITY POLICY GLOSSARY FOR DEFINITIONS OF SPECIAL
TERMS (ACE-0999).”

IV. PROCEDURES:
A. Standards:
1. All computing resources shall be assigned a Resource Owner who is
   responsible for the Integrity, Confidentiality, and Security of the
   resource.
2. The policies and procedures of the ACE relating to Information Security
   apply to all component organizations of the Affiliated Covered Entity
   and all members of the Workforce.
   Each component organization of the ACE will name an Information Security
   Contact responsible for that component organization’s compliance with the
   security regulations.
B. Responsibilities:
1. The Chief Corporate Officer of VCUHS will identify the individual who
   will serve as the ACE Information Security Official.
2. The computing Resource Owners shall inform the ACE Information Security
   Official of changes to the databases, systems, equipment, or processes
   that may impact the Security of Electronic Protected Health Information.
   They shall be guided in the implementation of these changes by the
   advice of the ACE Security Official in relation to compliance with the
   HIPAA Security Regulations.
3. The Information Security Contacts shall inform the ACE Information
   Security Official of the results of their reviews of applications,
   processes, incidents, and changes. They will assist the Affiliated
   Covered Entity Information Security Official in any suggested follow-up
   actions and will implement recommendations determined to be reasonable
   and appropriate for improving the Security of Electronic Protect Health
   Information.
4. The ACE Information Security Official has the right to issue a “stop
   work” notice on changes, or to require that current systems and
   practices be suspended, until they are determined to be compliant with
   regulations.

V. RESOURCES:
A. Compliance Office
B. ACE Security Official (804) 828-1990
C. Information Security Contacts
VI. REFERENCES:
A. HIPAA: 45 C.F.R. §164-308(a)(2).
B. VCU Health Systems – Glossary of HIPAA Terms
C. VCU Health Systems Compliance Manual
D. Implementation Directive – Policy ACE-0002

APPROVED:

Signature on File

Dr. Sheldon M. Retchin, M.D., M.S.P.H.