

VCU Affiliated Covered Entity
HIPAA Security Rule Operational Policy

SUBJECT:	POLICY NO.:	ACE-0011
	APPROVED DATE	10/19/2005
Business Associate Contracts and Other Arrangements	EFFECTIVE DATE:	11/19/2005
SR-308b1	REVIEWED DATE:	
	SUPERSEDES NO.:	NEW

I. PURPOSE:

Definition of the policies and procedures governing the establishment of Business Associate Agreements relating to the HIPAA Security Rule

II. POLICY:

All vendors and other third parties having potential Access to Electronic Protected Health Information of the Affiliated Covered Entity (ACE) must sign and abide by appropriate Business Associate Agreement in which they pledge to follow the specific steps necessary to protect this information and to communicate with the ACE relating to any Security Incidents.

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

IV. PROCEDURES:

A. Standards:

1. The policies and procedures of the ACE relating to Information Security apply to all component organizations of the ACE and all members of the Workforce.
2. All computing resources shall be assigned a Resource Owner who is responsible for the Integrity, Confidentiality, and Security of the resource.

B. Responsibilities:

1. The Purchasing Department shall develop, with assistance from the Compliance Office, Legal and Information Systems, a standard Business Associate Agreement clause that shall be the basis of such understandings between the component organizations of the ACE and its suppliers, contractors, and vendors when such vendors have Access to Electronic Protected Health Information. The Purchasing Department will execute and maintain the Business Associate Agreement.
2. Any objections or changes to the wording by the Business Associates must be reviewed and approved by both Legal and the designated ACE Information Security Official before acceptance by the ACE.
3. The ACE Information Security Official will be responsible for reviewing any of the documentation for compliance with the provisions of the Agreement (such as the external Audits).

V. RESOURCES:

- A. Compliance Office
- B. ACE Security Official (804) 828-1990
- C. Purchasing Department -

VI. REFERENCES:

- A. HIPAA: 45 C.F.R. §164.308(b)(1).
- B. VCU Health Systems - Glossary of HIPAA Terms
- C. VCU Health Systems Compliance Manual
- D. Implementation Directive - ACE-0002

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APPROVED:

Signature on File
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