I. PURPOSE:
This policy relates to the establishment and implementation of hardware, software, and procedural mechanisms that record and examine activity in Information Systems that contain or use Electronic protected information systems.

II. POLICY:
The Affiliated Covered Entity (ACE) will maintain reasonable and appropriate records and Audit trails of changes and Accesses to Electronic Protected Health Information sufficient to identify inappropriate Accesses and actions.

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. Resource Owners are responsible for actively monitoring the resources under their control. Monitoring shall include the following aspects to the extent reasonable and appropriate:
   a) Maintaining an inventory of the resources.
   b) Reviewing records of successful and unsuccessful Access attempts.
   c) Intrusion detection equipment, software, and procedures that observe events that occur and that lead to a decision regarding whether a given pattern of activity is or is not suspicious.
   d) Logging and making available for review (for a reasonable period of time), Audit trails identifying the member of the Workforce Accessing or revising the Electronic Protect Health Information.

III. RESOURCES:
A. Compliance Office
B. ACE Security Official (804) 828-1990

IV. REFERENCES:
A. HIPAA: 45 C.F.R. §164.312 (b).
B. VCU Health Systems — Glossary of HIPAA Terms
C. VCU Health Systems Compliance Manual
D. Implementation Directive – ACE-0002

APPROVED:

Signature on File
Dr. Sheldon M. Retchin, M.D., M.S.P.H.