

VCU Affiliated Covered Entity
HIPAA Security Rule Operational Policy

SUBJECT:	POLICY NO.:	ACE-0018
	APPROVED DATE	10/19/2005
Person or Entity Identification	EFFECTIVE DATE:	11/19/2005
SR-312d	REVIEWED DATE:	
	SUPERSEDES NO.:	NEW

- I. PURPOSE:
This policy documents allowed technical approaches that serve to verify that a person or entity, seeking access to Electronic Protected Health Information, is the one claimed.
- II. POLICY:
The Affiliated Covered Entity (ACE) shall require members of the Workforce that Access Electronic Protected Health Information to appropriately identify themselves prior to being granted Access.
- 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 it's Integrity, Confidentiality, and Security.
3. The minimum acceptable person identification is the use of a unique, individually assigned User ID and password combination.
4. For personnel Accessing Electronic Protected Health Information remotely, the additional Authentication of a security token type device or other two-factor Authentication method is required. [The two-factor Authentication requirement may be waived for Access to resources on VCUNet if other appropriate and reasonable means to Protect Electronic Protected Health Information are adopted and documented. Waiver requests must be in writing and must be requested by the area vice-president and approved by the Assistant Vice President - Administrative Information Technology, or the Vice Provost - Academic Technology. Approved waivers are to be maintained in the requesting department with a copy sent to the ACE Security Official.]
B. Responsibilities:
1. Resource Owners shall validate that only Authorized members of the Workforce are allowed to utilize the resources.
- IV. RESOURCES:
A. Compliance Office
B. ACE Security Official (804) 828-1990
- V. REFERENCES:
A. HIPAA: 45 C.F.R. §164.312 (d).
B. VCU Health Systems - Glossary of HIPAA Terms
C. VCU Health Systems Compliance Manual
D. Implementation Directive - Policy ACE-0002

APPROVED:

Signature on File
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