SUBJECT: POLICY NO.: ACE-0019
APPROVED DATE 10/19/2005
EFFECTIVE DATE: 11/19/2005
REVIEWED DATE:
SUPERSEDES NO.: NEW

I. PURPOSE:
This policy describes the documentation and retention standards for information associated with HIPAA Security Rule Compliance activities.

II. POLICY:
The Affiliated Covered Entity (ACE) shall document, in Policies And Procedures, the appropriate guidance information required to assist the component organizations in remaining compliant with the HIPAA Security Regulations.

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

IV. PROCEDURES:
A. Standards:
1. All documentation in the form of Policies, Procedures, Guidelines, System Disclosure Logs, etc. will be retained for a period of at least twenty-one years following the date when these were last in effect.
2. The Policies And Procedures of the Affiliated Covered Entity relating to Information Security apply to all component organizations of the ACE and all members of the Workforce.
3. The ACE Policies, Procedures and Guidelines will be reviewed and updated as necessary on a three-year cycle.

B. Responsibilities:
The designated ACE Security Official will be responsible for documentation retention, and for initiating and managing the periodic review and update of the ACE Policies and Procedures.

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

VI. REFERENCES:
A. HIPAA: 45 C.F.R. §164.316 (a)and(b).
B. VCU Health Systems – Glossary of HIPAA Terms
C. VCU Health Systems Compliance Manual
D. Implementation Directive – Policy ACE-002

APPROVED:

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