HIPAA Security Policy #15

Technical Safeguards
Audit Controls Policy

Statement of Policy

The Company is a *Business Associate* under the Health Insurance Portability and Accountability Act (HIPAA) Security Regulations. As such, The Company is required to safeguard electronic protected health information (ePHI) in accordance with the HIPAA Security Rule Regulations as well as The Health Information Technology for Economic and Clinical Health Act (the "HITECH Act"). These policies reflect The Company's commitment to complying with such Regulations. The Company will comply with the *Covered Entity's* documented HIPAA policies and procedures unless specifically stated in the below policy.

Purpose of Policy

The purpose of the policy is to define the hardware, software and/or procedural mechanisms that will be implemented by The Company to record and examine activity in information systems that contain or use ePHI.

Policy

15   Audit Controls

TYPE: Standard
REFERENCE: 45 CFR 164.312(b)
SECURITY REGULATION STANDARDS LANGUAGE:
"Implement hardware, software, and/or procedural mechanisms that record and examine activity in information systems that contain or use electronic protected health information."

1.   The Company should implement or follow a covered entity's audit mechanisms to track and audit access to systems that contain or use ePHI.

    i.   Each system(s) containing ePHI shall utilize a mechanism to log and store system activity.

    ii.   Each system's audit log shall include, but is not limited to, User ID, Login Date/Time, and Activity Time. Audit logs may include system and application log-in reports, activity reports, exception reports or other mechanisms to document and manage system and application activity.

    iii.   System audit logs shall be reviewed on a regular basis. (See HIPAA Security Policy #1 – Security Management).

    iv.   Security incidents such as activity exceptions and unauthorized access attempts should be detected, logged and reported immediately to the appropriate systems management and the HIPAA Security Officer in accordance with the HIPAA Security Policy #6 - Security Incident Procedures.

2. The Audit Control procedure will apply to all systems that contain ePHI that The Company has operational control of and are not covered under the covered entity's Audit Control procedure.