East Carolina University

HIPAA Security Policies

Subject: Workforce Security

Policy #: Security-0003

Coverage: ECU Health Care Components

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Supersedes:

Effective Date: April 21, 2005

Reviewed Date: May 30, 2013


HIPAA Security Rule Language:

“Implement policies and procedures to ensure that all members of its workforce have appropriate access to electronic protected health information, as provided under paragraph (a) (4) of this section, and to prevent those workforce members who do not have access under paragraph (a) (4) of this section from obtaining access to electronic protected health information.”

Regulatory Reference: 45 CFR 164.308(a)(3)(i)

I. PURPOSE

This policy reflects East Carolina University’s commitment to allow access to information systems containing EPHI only to workforce members who have been appropriately authorized. The type and extent of access authorized to ECU information systems containing EPHI must be based on review by the system owners/stewards or their designated delegates.

II. AUTHORIZATION AND ENFORCEMENT

Health Care component management and/or administrator(s) are responsible for monitoring and enforcing this policy, in consultation with the ECU IT Security Officer, ECU HIPAA Security Officer, and ECU HIPAA Privacy Officer.

III. POLICY

Only properly authorized workforce members are provided access to information systems containing EPHI. The type and extent of access authorized to ECU information systems containing EPHI must be based on review by the system owners/stewards or their designated delegates.
Access to ECU information systems containing EPHI must be granted only to properly trained ECU workforce members who have a need for EPHI in order to accomplish a legitimate task.

**IV. APPLICABILITY**

This policy is applicable to all workforce members who are responsible for or otherwise administer a healthcare computing system. A healthcare computing system is defined as a device or group of devices that store EPHI which is shared across the network and accessed by healthcare workers.

**V. PROCEDURE**

The following standards and safeguards must be implemented to satisfy the requirements of this policy:

1. As defined in ECU’s **Authorization and/or Supervision Standard**, ECU Health Care Components must ensure that all workforce members who have the ability to access ECU information systems containing EPHI are appropriately authorized or supervised.

2. As defined in ECU’s **Workforce Clearance Standard**, ECU workforce members must be adequately screened during the hiring process, including background checks.

3. As defined in ECU’s **Termination Procedures Standard**, ECU Health Care Components must create and implement a formal, documented process for terminating access to EPHI when the employment of a workforce member ends.

**VI. COORDINATING INSTRUCTIONS**

1. All section policies, standards and procedures will be reviewed annually. Every section policy, standard and procedure revision/replacement will be maintained for a minimum of six years from the date of its creation or when it was last in effect, whichever is later. Other East Carolina University, University of North Carolina system, or state of North Carolina requirements may stipulate a longer retention.