I. PURPOSE

This standard reflects East Carolina University’s commitment to regularly review records of activity on information systems containing EPHI.

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. STANDARD

ECU Health Care Components must regularly review records of activity on information systems containing EPHI. Appropriate hardware, software, or procedural auditing mechanisms must be implemented on information systems that contain or use EPHI. Records of activity created by audit mechanisms implemented on information systems must be reviewed regularly.

IV. APPLICABILITY

This standard 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

1. ECU Health Care Components must regularly review records of activity on information systems containing EPHI. Records of activity may include but are not limited to:
   a. Audit logs
   b. Access reports
   c. Security incident tracking reports

2. Appropriate hardware, software, or procedural auditing mechanisms must be implemented on ECU information systems that contain or use EPHI. At a minimum, such mechanisms must provide the following information if feasible:
   a. Date and time of activity
   b. Origin of activity
   c. Identification of user performing activity
   d. Description of attempted or completed activity

3. Such review must be via a formal documented process. At a minimum, the process must include:
   a. Definition of which workforce members will review records of activity
   b. Definition of what activity is significant
   c. Procedures defining how significant activity will be identified and reported
   d. Procedures for preserving records of significant activity

4. ECU Healthcare Component must maintain the documentation of the review of such systems for a minimum of six years.

5. Whenever possible, ECU workforce members should not monitor or review activity related to their own user account.

VI. COORDINATING INSTRUCTIONS

1. All section policies, standards and procedures will be reviewed annually. Every section policy, standards 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.