



National University of Health Sciences General Policies

Title: **HIPAA Information Technology Administrative Safeguards** Page 1 of 2

Date Adopted: **02/01/18**

Date(s) Revised:

Date(s) Reviewed: 09/29/2020

President

Date

POLICY STATEMENT

The following addressable IT policies will be implemented to encourage administrative security of NUHS network resources.

SCOPE

IT Department (all locations).

DEFINITIONS

Personnel: Includes, but is not limited to, all employees, medical and clinical staff, business associates, allied health professional staff or students, vendors, volunteers, excluding patients and visitors.

PHI: Individually identifiable health information, including patient demographics, that is created or received by a provider and identifies the person and relates to his or her past, present, or future physical or mental health, treatment, and/or payment, except for information relating to persons who have been deceased for more than fifty (50) years.

Sensitive Information: Data that is proprietary to NUHS and is not intended to be disclosed to the general public.

REGULATORY REFERENCE

45 C.F.R. 163.308(a)(5)(ii).

PROCEDURE

- Under the guidance and leadership of the HIPAA Security Officer and MIS department within NUHS shall implement the following procedures for ensuring basic administrative security for the NUHS network:
 - NUHS personnel shall provide employees with periodic security reminders. These reminders will be distributed by email and posted in conspicuous locations on a periodic basis.
 - NUHS shall document and audit access to the NUHS network. This documentation shall be maintained by MIS and audits shall be conducted on a periodic basis by MIS. These audits may address users, workstations, transactions or programs (e.g., digital x-ray machines, Medisoft, or users in a clinical department). Any discrepancies or concerns shall be reported to the HIPAA Security Officer.
 - NUHS shall maintain commercially reasonable firewalls, virus scanning and other commercially reasonable protections as provided by its contractor, ComPuCom and Gordon Flesch.

POLICY RESPONSIBILITY

HIPAA Security Officer

REVISION

NUHS reserves the right to unilaterally revise, modify, review or alter the terms and conditions of the policy within the constraints of law, with or without reasonable notice.