

# HIPAA-35: Unique User I.D. Policy

Effective Date:	12-01-2015	Last Revised:	7-17-2017
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## Scope of Policy

This policy governs the issuance, maintenance, and security of Unique User I.D.'s for access to **TCS's** information systems. All personnel of **TCS** must comply with this policy. Demonstrated competence in the requirements of this policy is an important part of the responsibilities of every member of the workforce.

## Assumptions

- TCS** must comply with HIPAA and the HIPAA implementing regulations pertaining to the use of unique user I.D.'s, in accordance with the requirements at § 164.306, and § 164.312(a)(1).
- The use of unique user I.D.'s is an essential element in our overall effort to protect individually identifiable health information, including Protected Health Information ("PHI", as defined by HIPAA).

## Policy Statement

- It is the Policy of **TCS** to exclusively use unique user I.D.'s for all information system access and activities, in full compliance with all the requirements of HIPAA.
- Responsibility for the development and implementation of this unique user I.D. policy, and any procedures associated with it, shall reside with Executive Director in collaboration with appropriate IT personnel, who shall ensure that access to all our information systems and data is accomplished exclusively through the use of unique user I.D.'s.
- Nothing in this policy shall limit the use of additional security measures, including login and access measures, that may further enhance the security and protection we provide to individually identifiable health information, including Protected Health Information ("PHI", as defined by HIPAA).
- It is the Policy of **TCS** to fully document all unique user I.D.-related activities and efforts, in accordance with our Documentation Policy.

## Procedures

- Unique user IDs are assigned to all employees permitting password-protected role-based access to electronic PHI.