

HIPAA-39: Audit Controls Policy

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

This policy governs Audit Controls for **TCS**. 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 audit controls, in accordance with the requirements at § 164.312(b).
- The establishment and implementation of an effective audit controls policy is a crucial element in our overall objective or providing reasonable protections for individually identifiable health information, including Protected Health Information ("PHI", as defined by HIPAA).

Policy Statement

- It is the Policy of **TCS** to establish and maintain appropriate and effective audit controls in full compliance with the requirements of HIPAA.
- Responsibility for the development and implementation of this audit controls policy, and any procedures associated with it, shall reside with the Executive Director in collaboration with appropriate IT personnel, who shall ensure that this policy is maintained, updated as necessary, and implemented fully throughout our organization.
- Specific procedures shall be developed to specify the proper usage and application of audit controls for all computers, workstations, and systems that access individually identifiable health information, including Protected Health Information ("PHI", as defined by HIPAA).
- It is the Policy of **TCS** to fully document all audit control-related activities and efforts, in accordance with our Documentation Policy.

Procedures

- TCS** will engage in semi-annual reviews of all computer systems to ensure ongoing compliance with HIPAA.
- TCS** will perform semi-annual system configuration assessments to ensure compliance with IT security best practices (e.g., eliminate default device passwords, ensure appropriate logging and network security policies are up to date, etc.).
- TCS** employs a role-based access system to ensure that all employees are capable of accessing only electronic PHI that is required to perform their work-related duties.