

URI HIPAA SECURITY POLICY- IMPLEMENTATION SPECIFICATION #3A

Title:	AUTHORIZATION / SUPERVISION	Purpose & Background	See Memo Entitled "HIPAA at URI: Introduction to HIPAA and an Overview of HIPAA Implementation at URI" available online at the URI HIPAA website
Originator (Responsible Department/ Unit):	URI HIPAA Compliance Oversight Committee	Effective Date:	05/22/2018
Applies to:	All URI Departments and Units Designated as HIPAA "Covered Components" and "Business Associate Components"	Revised Date(s):	

Purpose:

This implementation specification reflects URI's commitment to ensure that all workforce members who can access URI information systems containing EPHI are appropriately authorized or supervised.

Specification:

URI Covered Entities must ensure that all workforce members who can access URI information systems containing EPHI are appropriately authorized and/or supervised.

URI Covered Entities must have a formal documented process for granting authorization to access to URI information systems containing EPHI. The type and extent of access granted to URI information systems containing EPHI must be based on review by the system owners/stewards or their designated delegates. Access to URI information systems containing EPHI must be authorized only for URI workforce members having a need for specific information in order to accomplish their respective job responsibilities.

Before third-party persons are granted access to URI information systems containing EPHI or URI locations where EPHI can be accessed, a review by the system owners/stewards or their designated delegates must be conducted. Access (other than temporary, incidental and institutional access) and by third-party persons to URI information systems containing EPHI or URI locations where EPHI can be accessed, must be allowed only (when required or appropriate) after appropriate security controls have been implemented and an agreement has been signed defining the terms for access. Whenever appropriate, third-party persons should be supervised by an appropriate URI employee.

Procedure:

The following implementation specifications and safeguards must be implemented to satisfy the Requirements of this implementation specification:

1. Appropriate URI information system stewards/owners or their chosen delegates must define and authorize all access to URI information systems containing EPHI. Such information system owners and delegates must be appropriately designated and documented as specified in the **Access Authorization Implementation Specification (4A)**.
2. The type and extent of access granted to URI information systems containing EPHI must be based on specifications in the **Access Establishment and Modification Implementation Specification (4B)**.
3. Before third party persons are granted access to URI information systems containing EPHI or URI locations where EPHI can be accessed; review by the system owners/stewards or their designated delegates must be performed. At a minimum, the review must consider the following factors:
 - Type of access required
 - Sensitivity of the EPHI on the information system
 - Security controls on the information system
 - Security controls used by the third party
4. Access (other than temporary, incidental and institutional access) by third party persons to URI information systems containing EPHI or URI locations where EPHI can be accessed must be allowed only after appropriate security controls have been implemented and an agreement (when required or appropriate) has been signed defining the terms for access. The agreement must define the following:
 - The security processes and controls necessary to ensure compliance with URI's security policies.
 - Restrictions regarding the use and disclosure of URI data.
 - URI's right to monitor and revoke third party persons' access and activity.
5. Where appropriate, third party persons should be supervised by an appropriate URI employee when they are accessing URI information systems containing EPHI or in an URI location where EPHI might be accessed.

HIPAA REGULATORY REFERENCE: 45 CFR 164.308(a)(3)(ii)(A)

HIPAA SECURITY REGULATION IMPLEMENTATION SPECIFICATION LANGUAGE: *"Implement procedures for the authorization and/or supervision of workforce members who work with EPHI or in locations where it might be accessed."*