HIPAA Security Rule

Tulane University Encryption and Decryption

Department: Technology Services	**Implementation Specification:** Encryption and Decryption (A)
Standard: Access Control	**Section:** 164.312(a)(2)(iv)

Under the Security Rule, Tulane University is required to implement a mechanism to encrypt and decrypt e-PHI or, if Tulane University determines that it is not reasonable and appropriate to implement encryption and decryption mechanisms for all e-PHI, to document why it is inappropriate and to implement an alternative mechanism where appropriate. This document records how Tulane University has complied with this requirement under the Security Rule.

Based on its risk analysis, Tulane University has determined that it would be reasonable and appropriate to encrypt e-PHI on the IDX billing system.

This determination was based on the need to balance the benefits and challenges of protecting e-PHI against the increase in security technology complexity and administrative overhead including performance considerations and usability.

To encrypt e-PHI, Tulane University utilizes, on an ongoing basis:

- VPN tunnel

All encryption and decryption capabilities of products and systems have been tested to ensure proper functionality.

Based on its risk analysis, Tulane University has determined that it would not be reasonable and appropriate to require encryption and decryption technology for all e-PHI not located on the IDX billing system, such as in all emails or on all personal computers or portable devices. If a workforce member maintains or sends e-PHI that they believe requires additional protections based on amount, sensitivity, or other considerations, he or she should contact the Security Officer for guidance on encryption and decryption.