

HIPAA Security Rule

Policies and Procedures Standard

	Implementation Specification: Policies and Procedures Standard
Approved: April 19, 2005	Revised:

Tulane University is required to implement reasonable and appropriate policies and procedures to comply with the standards, implementation specifications and other requirements of the Security Rule.

As of the effective date of April 20, 2005, Tulane University has developed and implemented all policies and procedures required by the Security Rule. Tulane University designed its security policies and procedures in order to take reasonable and appropriate steps to ensure the confidentiality, integrity and availability of e-PHI in accordance with the Security Rule. The security policies and procedures were structured around the following considerations:

- Size, complexity and capabilities of Tulane University
- Tulane University's technical infrastructure, hardware and software capabilities
- Cost of implementing security controls
- · Probability and criticality of risks to e-PHI

All members of the workforce, including managers, were trained on Tulane University's security policies and procedures that apply to Tulane University generally and to them in their individual roles. In addition, workforce members were provided with access to copies of relevant policies and procedures.

The Security Officer is responsible for overseeing the implementation of these policies and procedures and continues to review and update them as needed. Any updates are promptly reflected in the written documentation of the individual policy or procedure, as specified in the *Documentation* policy, and in workforce training, as appropriate.