



HIPAA Security Rule

Tulane University Risk Management

Department: Technology Services	Implementation Specification: Risk Management (R)
Standard: Security Management Process	Section: 164.308(a)(1)

Under the Security Rule, Tulane University was required to implement security measures sufficient to reduce risks to and vulnerabilities of e-PHI to a reasonable and appropriate level, as required by 45 C.F.R. § 164.306(a). Risk management related activities were essential to help identify critical resources needed to support the Tulane University and the likely threat to all such resources.

The Risk Management process was based on Tulane University's **Risk Analysis** and involves a documented process that was used as a basis for selection and implementation of security measures. Tulane University's Risk Management process included the following steps:

- Phase 1: Risk Analysis – This was carried out according to the **Risk Analysis** documented separately.
- Phase 2: Risk Mitigation – Tulane University selected and implemented reasonable, appropriate and cost-effective security measures to manage and mitigate identified risks.
 - **Prioritize actions** – Risks identified in the **Risk Analysis** were prioritized on a scale from high to low based on the potential impact to e-PHI systems. The highest priority was given to those threats with the highest risk levels. Resources, as available, were allocated according to identified risks.
 - **Evaluate recommended safeguard options** – Recommended safeguard options to minimize or eliminate identified risks to e-PHI were evaluated based on the nature, feasibility and effectiveness of the specific safeguard option.
 - **Conduct cost-benefit analysis** – The costs and benefits of implementing selected safeguard options were identified and defined.
 - **Select safeguards** – The most appropriate, reasonable and cost-effective safeguard options for reducing risks to e-PHI were selected based on the cost-benefit analysis.
 - **Assign responsibility** – The Security Officer and other workforce members who have assigned security responsibility developed an implementation plan regarding safeguard options.
 - **Develop safeguard implementation plan** – The responsible workforce members determine the most reasonable and appropriate plan for implementation of safeguard options.
 - **Implement selected safeguards** – The selected safeguard options were properly implemented by the responsible workforce members. The Security Officer oversees this implementation.
- Phase III: Evaluation and Assessment -
 - **Evaluate safeguards deployed** – Selected and implemented security methods were evaluated and revised, as necessary, by the Security Officer.
 - **Evaluate security policies** – Security policies were evaluated on a continuing basis and

updated according to implemented changes.

Tulane University completed its initial Risk Management activities in August 2004. Risk Management activities will be repeated on an ongoing basis as needed determined by future **Risk Analysis** conclusions.