

HIPAA Security Rule

Tulane University Security Reminders Policy

Department: Technology Services	Policy Description: Security Reminders (A)
Standard: Security Awareness and Training	Section: 164.308(a)(5)
Approved: April 19, 2005	Revised:
Effective Date: April 20, 2005	Policy Number: TS-12

PURPOSE

The purpose of this policy is to provide security information and awareness to all members of the workforce through periodic security reminders. Through this policy, Tulane University ensures that workforce members, including those working remotely, are reminded of information security risks on an ongoing basis and know how to follow the security policies and procedures.

SCOPE

This policy applies to Tulane University Medical Group, its participating physicians and clinicians, and all University employees and business units who provide management, administrative, financial, legal, and operational support to or on behalf of Tulane University Medical Group and have been designated as part of the Tulane University HIPAA Health Care Component.

POLICIES AND PROCEDURES

Tulane University sends out quarterly security reminders via email to all members of the workforce. The security reminders reflect security awareness concerns and issues that have the potential to compromise the confidentiality, integrity or availability of e-PHI, as well as new or on-going security activities and initiatives.

In addition, Tulane University provides security information and awareness reminders when any of the following events occur:

- Substantial revisions are made to Tulane University's security policies or procedures;
- Substantial new security controls are implemented or significant changes are made to existing controls;
- Substantial changes are made to Tulane University's legal or business responsibilities relating to e-PHI security; or
- Substantial threats or risks arise against e-PHI Systems.

RESPONSIBILITIES:

The Security Officer is responsible for sending out security reminders to all members of the workforce on a quarterly basis.

Employees who violate this policy will be subject to disciplinary action up to and including termination of employment. Anyone who knows or has reason to believe that another person has violated this policy should report the matter promptly to his or her supervisor or the Security Officer. All reported matters will be

investigated, and, where appropriate, steps will be taken to remedy the situation. Where possible, every effort will be made to handle the reported matter confidentially. Any attempt to retaliate against a person for reporting a violation of this policy will itself be considered a violation of this policy that may result in disciplinary action up to and including termination of employment.

IMPLEMENTATION SPECIFICATION:

- § 164.308 Administrative safeguards.
- (a) A covered entity must, in accordance with § 164.306:
- (5)(i) Standard: **Security awareness and training**. Implement a security awareness and training program for all members of its workforce (including management).
- (ii) Implementation specifications. Implement:
- (A) **Security reminders** (Addressable). Periodic security updates.