

ADAMHS BOARD FOR MONTGOMERY COUNTY	BP # 523	
TITLE: Information System Activity Review	SUBJECT HIPAA SECURITY	
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PURPOSE: This policy is to guide the ADAMHS Board for Montgomery County in making decisions toward ensuring that information system activity is being monitored and reviewed appropriately.

POLICY:

1. The following must be included (but not limited) to adequately monitor and review information system activity:
 - 1.1. Internal audit procedures to regularly review records of information system activity. These procedures may utilize audit logs, activity reports, or other mechanisms to manage system activity.
 - 1.2. Audit logs, activity reports, or other mechanisms to document and manage information system activity must be reviewed at intervals commensurate with the associated risk of the information system or EPHI repositories contained on Board information systems.
 - 1.3. The Audit Control and Review Plan includes all systems and applications to be logged, the information to be logged for each system, and the procedures to review all audit logs and activity reports.
 - 1.4. A mechanism to report security incidents and suspected rogue activity to notify appropriate management, security, and privacy personnel will be in place.
 - 1.5. A schedule outlining the retention and disposal of audit logs and activity reports will also be established.

REFERENCES:

HIPAA Final Security Rule, 45 CFR Parts 160, 162, and 164, Department of Health and Human Services, <http://www.cms.hhs.gov/hipaa/hipaa2/regulations/security/default.asp>, February 20, 2003. §§ 164.308(a)(1)(ii)(D).

“Information Security: An Introductory Resource Guide for Implementing the HIPAA Security Rule”, National Institute for Standards and Technology (NIST),

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<http://csrc.nist.gov/publications/drafts/DRAFT-sp800-66.pdf>, May 2004.

"CMS Information Systems Security Policy, Standards and Guidelines Handbook", Centers for Medicare and Medicaid Services,
<http://www.cms.hhs.gov/it/security/docs/handbook.pdf>, July 2004.