



Policy and Procedures Manual

System Department

Supersedes:

Section: ORGANIZATIONAL PLANS

Subject: HIPAA Compliance Plan

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HIPAA Compliance Plan

PURPOSE

The purpose of this Plan is to set forth commitment to compliance with applicable mandates of the Administrative Simplification provisions, Title II, of the Health Insurance Portability and Accountability Act of 1996 and related amendments ("HIPAA").

DEFINITIONS

Nebraska Medicine Affiliated Covered Entity (ACE) means legally separate covered entities that designate themselves as a single covered entity for the purpose of HIPAA Compliance. Current Nebraska Medicine ACE members are: The Nebraska Medical Center, UNMC Physicians, UNMC, University Dental Associates, Bellevue Medical Center, and Nebraska Pediatric Practice, Inc. ACE membership may change from time to time. The Notice of Privacy Practices lists current ACE members

Compliance plan or plan means a coordinated set of policies, procedures, forms and other steps which, when taken together and applied and enforced according to their terms, will permit the Nebraska Medicine Affiliated Covered Entity (ACE) Center to comply with its obligations under HIPAA.

Covered transaction means an electronic transaction conducted by a covered component that is subject to the HIPAA transaction standards.

Hybrid Entity means a single legal entity that is a covered entity whose business activities include both covered and non-covered functions; and that designates health care components ("covered functions").

Organized Health Care Arrangement (OHCA) means an organized system of health care in which more than one covered entity participates, and in which the participating covered entities hold themselves out to the public as participating in a joint arrangement.

Protected health information means information that relates to past, present or future physical or mental health or condition of an individual, the provision of health care to an individual, or the past, present or future payment for health care to an individual, which identifies the individual or as to which there is a reasonable basis to believe could be used to identify the individual.

Safeguard means a physical, technical or administrative action which is designed to achieve or help meet a privacy or security objective.

Transaction standard means a mandatory standard for conducting covered transactions. The transaction standards are adopted as federal regulations at 45 C.F.R. Part 162.

GOVERNING LEGAL AUTHORITIES

- 1) Health Insurance Portability and Accountability Act of 1996 (42 U.S.C. §1320d to 1320d-8), and associated regulations and amendments, including but not limited to :
 - a) Health Information Technology for Economic and Clinical Health (HITECH) Act, Title XIII of Division A and Title IV of Division B of the American Recovery and Reinvestment Act of 2009 (ARRA), Pub. L. No. 111-5
 - b) 45 C.F.R. Parts 160, 162 and 164 - HIPAA standards for Electronic Transactions, Privacy, Security and Enforcement
- 2) Other federal and State law to the extent that such other federal or State law preempts a provision of HIPAA.

APPLICABILITY

This Policy applies to all covered components of UNMC/Nebraska Medicine and all personnel who are subject to UN HIPAA jurisdiction.

Hybrid Entity. The Nebraska Medicine Affiliated Covered Entity (ACE) is a hybrid entity. A hybrid entity is a covered entity that engages in both covered and non-covered functions. All components of Nebraska Medicine Affiliated Covered Entity (ACE) are covered unless specifically designated as non-covered using the criteria below:

1. Does not provide health care; or
2. Does not bill electronically utilizing the HIPAA standardized transactions; and
3. Maintains separate medical records from the covered components' medical records

The UNMC functions identified in Exhibit 1 have been designated as non-covered components for purposes of HIPAA compliance.

AFFILIATED COVERED ENTITY

a. Agreement

The Nebraska Medical Center Board of Directors authorized entering into an affiliated covered entity (ACE) agreement with University of Nebraska Board of Regents, UNMC Physicians, and University Dental Associates for the purpose of assuring a coordinated campus-specific HIPAA Compliance Plan. In 2009, Bellevue Medical Center and Nebraska Pediatric Practice, Inc. were added to the ACE. Under the agreement, the entities shall:

- 1) Jointly develop and implement HIPAA Compliance plans specific to their operations.
- 2) Designate individuals to serve as the HIPAA Privacy Officer and Information Security Officer on behalf of the ACE.
- 3) Use a joint Notice of Privacy Practices.

b. Governance

The Affiliated Covered Entity has formed a Joint Privacy/Information Security Governance structure composed of an Executive Committee and a Work Group. The mission of the governance structure is to ensure that the Affiliated Covered Entity meets privacy and information security regulatory requirements related to patient care, education and research.

The responsibilities of the Executive Committee are:

- Approve the Compliance Plan
- Approve/resolve policy matters
- Recommend changes to the Affiliated Covered Entity membership to the Governing Boards
- Approve the risk assessment
- Review the metrics
- Provide oversight of Incident Response

The responsibilities of the Work Group are:

- Review and recommend changes to the Compliance Plan
- Review and recommend policy matters
- Review metrics
- Review Risk Assessment
- Address joint privacy/information security issues as needed

PRIVACY OFFICER/CHIEF INFORMATION SECURITY OFFICER

Nebraska Medicine Affiliated Covered Entity (ACE) has appointed a Privacy Officer and Information Security Officer responsible for compliance with the privacy and security regulations respectively as described in this Plan. They shall:

- a) Advise Administration on compliance with the regulations.
- b) Serve as the designated official to assist the Patient Relations Department in resolving complaints and to provide additional information as necessary.
- c) Promptly investigate patient, workforce or other complaints alleging noncompliance with the rules or policies.

- d) Initiate efforts to mitigate the adverse effects of an incident through direct action or in collaboration with others.
- e) Carry out other assigned HIPAA-related responsibilities.

HIPAA TRAINING

All members of the Nebraska Medicine Affiliated Covered Entity (ACE) workforce receive HIPAA training and sign Nebraska Medicine Affiliated Covered Entity (ACE) Information Privacy, Confidentiality and Security Agreement during new employee orientation and annually thereafter. Training is documented in employee electronic training records. Directors and managers provide department-specific HIPAA training, as applicable to new workforce members. Training is also conducted when policies and procedures are created or modified, and also as a part of corrective action in response to HIPAA violations.

HIPAA COMPLIANCE PLAN ELEMENTS

The Table at Attachment A lists the policies and procedures covering each of the HIPAA standards as required by 45 CFR 164.316(a) and 164.530(i)(1).

The Compliance Committee will monitor privacy and security audits and make recommendations. The Finance Division will monitor electronic transaction and code set compliance.

Staff Accountability:

- Information Security Officer-8/21
- Privacy Officer-8/21
- Chief Medical Officer-8/21

<p>Department Approval Signed: Lisa Bazis Title: Chief Information Security Officer Department: Information Security</p>	<p>Administrative Approval Signed: Harris Frankel, M.D. Title: Chief Medical Officer</p>
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Exhibit 1
Non-covered components

Nebraska Medicine

a. *Nebraska Regional Poison Center*

The Nebraska Regional Poison Center is the poison center for Nebraska, Wyoming, and for parts of five neighboring states. It is a partnership between the State of Nebraska, UNMC, Nebraska Medicine, and Creighton University. The Nebraska Regional Poison Center provides 24-hour emergency telephone services, toxicologist consultations, public and professional education, and nuclear, biological and chemical terrorism preparedness and response services. Poison centers are health care providers providing treatment under HIPAA. The poison center is primarily grant-funded and does not bill electronically utilizing HIPAA standardized transactions. It maintains separate medical information from the rest of Nebraska Medicine and the other partners

b. *DNA lab*

Nebraska Medicine DNA laboratory provides forensics testing for law enforcement agencies for the State of Nebraska. The laboratory does not provide healthcare services. Information is maintained on a hard drive in the forensics area and firewalls are maintained between DNA laboratory information and protected health information maintained on other laboratory information systems.

c. *The Family Place*

This program provides child care for employees and students. This programs does not provide healthcare services.

UNMC

a. *Workforce:*

All employees, students and volunteers are members of the workforce except for those individuals who are classified as:

- i. Emeritus status
- ii. Senior Consultant
- iii. Adjunct
- iv. Volunteer faculty

and do not perform services in any covered component of the Affiliated Covered Entity.

Mandatory training exceptions will be granted for students who as part of their course study:

- Do not access PHI, and;
- Meet one of the following conditions:
 - i. Graduate College:

Student is considered an "unclassified" (non-degree seeking) student who is enrolled for one or two courses for a specific semester only.

Student is enrolled as a degree-seeking graduate student through one of our sister campuses (UNL, UNO or UNK) and is enrolled at UNMC as an intercampus students taking one or two courses for a specific semester only.
 - ii. Academic Services:

Student is considered an "unclassified" student (non-degree seeking) student who is enrolled for one or two non-clinical courses for a specific semester only. Any student taking a clinical course will be required to complete the training.

Student is enrolled as a degree-seeking graduate student through one of our sister campuses (UNL, UNO or UNK) and is enrolled at UNMC as an intercampus students taking one or two courses for a specific semester only.
 - iii. Allied Health:

Student is enrolled as a degree seeking undergraduate student and the student's education experience is provided under contract with an outside entity, such as Interservice Physician Assistant Program at Fort Sam Houston, Texas. All didactic and clinical degree requirements, including HIPAA training, are completed off-campus.

b. *Lion's Eye Bank:*

UNMC has an agreement and relationship with Lions Eye Bank of Nebraska. It is housed on UNMC campus and its employees are UNMC employees. However, the purpose of the Lion's Eye Bank is to retrieve, process and distribute the donor eye tissue to corneal surgeons and vision researchers. Organ and tissue procurement and banking activities are not included in the definition of "health care" under HIPAA. Additionally, the Lion's Eye Bank does not bill electronically utilizing the HIPAA standardized transactions.

c. *Women's, Infant and Children (WIC)*

UNMC is a subprovider of the WIC program. This entity maintains separate records and does not bill electronically utilizing the HIPAA standardized transactions. The Douglas County Department of Health has advised that the WIC program is not considered a covered entity by the County. The Final Privacy Rule states: "Government funded programs that do not have as their principal purpose the provision of, or payment for, the cost of health care but which do incidentally provide such services are not health plans (for example, programs such asWIC...)"December 28, 2000 Federal Register – Comments, Page 82479, middle column

d. *Faculty/Employee Assistance Program (F/EAP)*

The F/EAP is a confidential assessment, short term counseling, consultation and referral program for faculty, staff and their immediate family members who are experiencing problems of a personal nature and/or related to the workplace. EAP also provides crisis management, conflict management services, managerial/supervisory consultation and education presentations. EAP maintains separate patient charts and does not bill electronically utilizing the HIPAA standardized transactions.

e. *Child Development Center*

This program provides child care for employees and students. This program does not provide healthcare services.

f. *College of Nursing: Mobile Nursing & Community United for Health programs*

These programs provide screening services which are grant-funded. Separate medical records are maintained and electronic billing is not performed utilizing the HIPAA standardized transactions.

g. *Advisory Boards*

Throughout the organization, many programs have advisory boards. Examples would include Board of Advisors for the UNMC Eppley Cancer Center, Board of Counselors for UNMC, Advisory Board to the RUPRI Center for Rural Health Policy Analysis. These boards do not have access to protected health information and do not provide healthcare.

h. *UNMC Sponsored Health Fairs/Health Screenings*

UNMC sponsors a number of health fairs and health screenings (i.e. the Health Screening held at the NE State Fair). These events maintain a separate medical record and services for these events are not billed electronically utilizing the HIPAA standardized billing transactions.

i. *Center for Healthy Living*

This facility provides fitness services for employees, students, affiliated members and patients who wish to pay a membership fee. The facility also implements various health promotion/wellness programs/events/workshops. These fitness services and health promotion programs do not provide healthcare treatment.

k. *Munroe-Meyer Institute Summer Camp*

The Munroe Meyer Institute is housed on the UNMC campus and its employees are UNMC employees. The purpose of the The Munroe Meyer Institute Recreation program is to provide recreation activities for individuals with developmental disabilities. The MMI Recreation Program meets all 3 exclusion criteria as defined below:

1. Does not provide healthcare; or,
2. Does not bill electronically utilizing the HIPAA standardized transactions; and
3. Maintains separate medical records from the covered components' medical records

l. *Nebraska Regional Poison Center*

The Nebraska Regional Poison Center is the poison center for Nebraska, Wyoming, and for parts of five neighboring states. It is a partnership between the State of Nebraska, UNMC, The Nebraska Medical Center, and Creighton University. The Nebraska Regional Poison Center provides 24-hour emergency telephone services, toxicologist consultations, public and professional education, and nuclear, biological and chemical terrorism preparedness and response services. Poison centers are health care providers providing treatment under HIPAA. The poison center is primarily grant-funded and does not bill electronically utilizing HIPAA standardized transactions. It maintains separate medical information from the rest of UNMC and the other partners.

m. Alumni Association

The purpose of the Alumni Association is to promote and support the philosophy and programs of UNMC, to maintain communication of alumni through Alumni News, reunions and special events, to promote life-long learning of alumni, to encourage activities that help to recognize individuals and organizations who provide meritorious service and to encourage promotion of the profession by alumni.

n. UNeMed

UNeMed is a service oriented corporation that functions as the interface between the University of Nebraska Medical Center (UNMC) and industry to promote UNMC technology development and economic development in Omaha. In cooperation with UNMC inventors and the Intellectual Property Office, UNeMed drives and facilitates the transfer of the technologies invented on campus into the marketplace. UNeMed Corporation was established in 1992 as a for-profit subsidiary of UNMC.

Attachment A Policies and Audit Items documenting HIPAA Compliance

NOTE: Policy numbers are Nebraska Medicine (TNMC/UNMCP/Bellevue) numbers; UNMC/UDA/NPP have comparable policies with a different numbering scheme

I. Standardized Electronic Transactions & Code Sets

Requirement	Citation 45 CFR 164	Nebraska Medicine Policy Number	Audit Items	Nebraska Medicine Department	UNMC Department	Frequency
Electronic Claims and Payments	45 C.F.R. Parts 160 and 162					

Nebraska Medicine	Utilizes One Chart
College of Dentistry	Paper billing
University Dental Associates	Paper billing
College of Nursing	Utilizes One Chart
MMI	Utilizes One Chart
University Optical Shoppe	Paper to Medicaid

II. Privacy Regulations

Requirement	Citation 45 CFR 164	Nebraska Medicine Policy Number	Audit Items	Nebraska Medicine Department	UNMC Department	Frequency
Breach Notification	400-414	IM.23, Privacy Incident Response and Breach Notification	Risk assessment & breach notifications completed	HIPAA Office	HIPAA Office	Semi-Annual
Minimum Necessary	502(b) 514(d)	IM.12, Use & Disclosure of PHI	Electronic Health Record Access	HIPAA Office w/coordination of IT, HR, Health Information Management Dept	HIPAA Office w/coordination of IT, HR, Health Information Management Dept	Semi-Annual
Business Associates	502(e) 504(e)	FN.18, Contract Management	See contract database	Legal	Procurement	
Notice of Privacy Practices	520	RI.17, Notice of Privacy Practices	Conditions of Treatment form complete	Health Information Management Dept		Semi-Annual
Marketing & Fundraising	508(a) 514(f)	IM.12, Use & Disclosure of PHI; MI.10, Corporate Fundraising Guidelines	See opt-out database	Development Office	University of NE foundation	N/A
Right to Request Restrictions	522(a)	IM. 12, Requests for Restrictions RI.17, Notice of Privacy Practices	Timeliness of responses to requests	Health Information Management Dept		Semi-Annual

Requirement	Citation 45 CFR 164	Nebraska Medicine Policy Number	Audit Items	Nebraska Medicine Department	UNMC Department	Frequency
Confidential Communications	522(b)	RI. 17, Notice of Privacy Practices				
Access	524	IM.13, Access & Amendment of DRS	Timeliness of responses to requests	Health Information Management Dept		Semi-Annual
Amendment	526	IM.13 Access & Amendment of DRS	Timeliness of responses to requests	Health Information Management Dept		Semi-Annual
Accounting of Disclosures	528	IM.22, Accounting of Disclosures	Timeliness of responses to requests	Health Information Management Dept		Semi-Annual
Personnel Designations	530(a)	IM.6, Privacy, Confidentiality & Security of PHI	See appointment letters	HIPAA Office		Update as necessary
Education & Training	530(b)	IM.6, Privacy, Confidentiality & Security of PHI	New Employee Orientation; Documented in InfoTrac	Learning Connection	Blackboard	x
Safeguards	530(c)	See Security matrix	See Security	HIPAA		x
Sanctions	530(e)	IM.6, HR.5, HR.7, Corrective Action	List of corrective action taken in response to privacy violations in HR	Human Resources	Human Resources	N/A
Mitigation	530(f)	IM.6, IM.23, Privacy Incident Response		HIPAA Office	HIPAA Office	
Refraining from Retaliatory Acts	530(g)	IM.6, Privacy, Confidentiality & Security of PHI		HIPAA Office	HIPAA Office	
Waiver of Rights	530(h)	IM.6, Privacy, Confidentiality & Security of PHI		HIPAA Office	HIPAA Office	
Policies & Procedures	530(i)	IM.6, Privacy, Confidentiality & Security of PHI		HIPAA Office	HIPAA Office	Reviewed every 2 years; Update as practices change
Documentation/ Retention	530(j)			HIPAA Office	HIPAA Office	Maintain documentation for compliance

II. Security Regulation

Requirement	Citation 45 CFR 164	Nebraska Medicine Policy Number	Audit Item	Nebraska Medicine Department	UNMC Department	Frequency
Administrative Safeguards						
Security Management Process						
Risk Analysis	308(a)(1)	SYS023 Information Security/Risk Assessment		Information Security	Information Security	Annual
Risk Management	308(a)(1)	HP 02 Information Security Plan		Information Security	Information Security	
Sanction Policy	308(a)(1)	IM.6, HR.5, HR.7, Corrective Action Policy	List of corrective actions taken in response to security violations in HR	Human Resources	Human Resources	
Information System Activity Review	308(a)(1)	SYS.007- TrustedFileServer, SYS.008-DMZ File Server, IM.12-Use and Disclosure of PHI; IM01 Computer Use and Electronic Security	1.Electronic Health Record Access 2.System logs	1. Information Securityw/coordination with Health Information management, IT and HR 2. System Administrators/ Information Custodians in coordination with Network Management		1. Semi-Annual 2. Periodically
Assigned Security Responsibility	308(a)(2)	IM.6 Privacy, Confidentiality and Security of PHI	See appointment letters	HIPAA Office	HIPAA office	Update as necessary
Workforce Security						
Authorization and/or Supervision	308(a)(3)	IM.17 Access Control to Information Technology Resources EC.35 Facility Security IM.16 End User Device	Defined by system	See documentation	See documentation	Periodically
Workforce Clearance Procedures	308(a)(3)	IM.17 Access Control to Information Technology Resources	Defined by system	See documentation	See documentation	Periodically
Termination Procedures	308(a)(3)	IM.17 Access Control to Information Technology Resources	Defined by system	See documentation	See documentation	Periodically
Information Access Management						

Requirement	Citation 45 CFR 164	Nebraska Medicine Policy Number	Audit Item	Nebraska Medicine Department	UNMC Department	Frequency
Isolating Health Care Clearinghouse Function	308(a)(4)	Not applicable				
Access Authorization	308(a)(4)	IM.17 Access Control to Information Technology Resources	Defined by system	See documentation	See documentation	Periodically
Access Establishment and Modification	308(a)(4)	IM.17 Access Control to Information Technology Resources	Defined by system	See documentation	See documentation	Periodically
Security Awareness and Training						
Security Reminders	308(a)(5)	IM.6 Privacy, Confidentiality and Security of PHI IM.18 Email which contains PHI	New Employee Orientation; Documented in On Track; Training is also conducted when policies and procedures are created or modified, and also as a part of corrective action in response to HIPAA violations.	Learning Connection	Blackboard	x
Protection from Malicious Software	308(a)(5)	SYS.007 Trusted File Server; SYS.008 DMZ File Server; IM.16 End User Device; IM.15 Information Security Incident Reporting and Response; SYS.009 Network Infrastructure; SYS.010 Wireless	Number of occurrences	Information Security	Information Security	Semi-Annual
Log-in Monitoring	308(a)(5)	SYS.007- Trusted File Server, SYS.008-DMZ File Server, IM.12-Use and Disclosure of PHI	1.Electronic Health Record Access 2.System logs	1. HIPAA office w/coordination of MR, IT and HR 2. System Administrators/ Information Custodians in	1. HIPAA office w/coordination of MR, IT and HR 2. System Administrators/ Information Custodians in	1.Semi-Annual 2. Periodically

Requirement	Citation 45 CFR 164	Nebraska Medicine Policy Number	Audit Item	Nebraska Medicine Department	UNMC Department	Frequency
				coordination with Network Management	coordination with Network Management	
Password management	308(a)(5)	IM.11 Password Policy	Self Audit via Access Control Template	Information Custodian Responsibility		Annual
Security Incident Procedures						
Response and Reporting	308(a)(6)	IM.15 Information Security Incident Reporting and Response	Number of occurrences	Security Office		Semi-Annual
Contingency Plan						
Data Backup Plan Disaster Recovery Plan	308(a)(7)	SYS019: Information Technology Disaster Recovery			BCP testing	
Emergency Mode Operation Plan	308(a)(7)	SYS019: Information Technology Disaster Recovery		Downtime plans in place	Downtime plans in place	
Testing and Revision Procedure	308(a)(7)	SYS020: Change Control		Downtime plans tested during scheduled/unsche duled downtimes	Downtime plans tested during scheduled/unsch eduled downtimes	
Applications and Data Criticality Analysis	308(a)(7)	SYS019: Information Technology Disaster Recovery	Application Business Value Rating (ABVR) process established.	Enterprise Technical Services (ETS)	Information Technology Services (ITS)	Annual
Evaluation						
Evaluation	308(a)(8)	Ongoing review				
Business Associate Contracts						
Written Contract or Other Arrangement	308(b)(1)	FN.18, Contract Management SYS.003, Business and Academic partner Remote Access	See contract database Vendors with Remote Access	Legal	Procurement	
Physical Safeguards						
Facility Access Controls						
Contingency Operations	310(a)(1)	SYS019: Information Technology Disaster Recovery	Downtime policies and procedures in place	Facility	Facility	
Facility Security	310(a)(1)	EC.35 Facility Security	Incident Driven	Campus Security	Campus Security	
Plan						

Requirement	Citation 45 CFR 164	Nebraska Medicine Policy Number	Audit Item	Nebraska Medicine Department	UNMC Department	Frequency
Access Control and Validation Procedures	310(a)(1)	IM.17 Access Control to Information Technology Resources IT Procedure: Access to Computing Center Building EC.35 Facility Security	Visitor Logs Access Logs	ETS	ITS	
Maintenance Records	310(a)(1)	x	Work Management Logs; Construction or remodeling documented on record drawings	Facilities Management and Planning	Facilities Management and Planning	
Workstation Use						
Workstation Use	310(b)	IM.16 End User Device	Incident Driven	ETS	ITS	
Workstation Security						
Workstation Security	310(c)	IM.16 End User Device	Environmental Rounds;	Safety	Semi-Annual	
Device and Media Controls						
Disposal	310(d)(1)	IM.14 Destruction of Confidential Information	Environmental Rounds	Environmental Services	Semi-Annual	
Media Reuse	310(d)(1)	IM.14 Destruction of Confidential Information	Environmental Rounds	Environmental Services	Environmental Services	
Accountability	310(d)(1)	IM.14 Destruction of Confidential Information	See destruction logs	Recycling Coordinator	Recycling Coordinator	
Data Backup and Storage	310(d)(1)	SYS019: Information Technology Disaster Recovery	IT Production Logs	ETS	ITS	
Technical Safeguards						
Access Controls						
Unique User Identification	312(a)(1)	IM.1 Computer Use and Electronic Security	By system	System Administrator	System Administrator	
Emergency Access Procedure	312(a)(1)	IM.1 Computer Use and Electronic Security; Downtime plans	By system	Information Custodians	Information Custodians	
Automatic Logoff	312(a)(1)	IM.16 End User Device		ETS	ITS	
Encryption and Decryption	312(a)(1)	IM.20 Remote Access SYS.013 File Transfer Protocol SYS.010 Wireless		ETS	ITS	

Requirement	Citation 45 CFR 164	Nebraska Medicine Policy Number	Audit Item	Nebraska Medicine Department	UNMC Department	Frequency
		IM.16 End User Device				
Audit Controls						
Audit Controls	312(b)	IM.17 Access Control to Information Technology Resources	By system Electronic Health Record Access	Information Custodians HIPAA office in coordination of MR, IT and HR		
Integrity						
Mechanism to Authenticate Electronic PHI	312(c)(1)	SYS.003- TrustedFileServer, SYS.008-DMZ File Server, IM.12-Use and Disclosure of PHI	1.EMR Access 2.System logs	1. HIPAA office in coordination of MR, IT and HR 2. System Administrators in coordination with Network Management		
Person of Entity Authentication						
Person or Entity Authentication	312(d)	IM.1 Computer Use and Electronic Security IM.17 Access Control to Information Technology Resources	Complaints	Information Security Office in conjunction with HR		
Transmission Security						
Integrity Controls	312(e)(1)	IM.20 Remote Access SYS-007 Trusted File Server SYS-008 DMZ File Server SYS-009 Network Infrastructure SYS-013 File Transfer Protocol	Vulnerability reports	System Administrators	Semi-Annual	
Encryption	312(e)(1)	IM.20 Remote Access SYS-13 File Transfer Protocol		System Administrators	System Administrators	