Health Insurance Portability and Accountability Act

University Health Services

April 2015

The University of Texas at Austin
Office of Internal Audits
UTA 2.302
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Health Insurance Portability and Accountability Act: University Health Services
Project Number: 14.306
April 9, 2015

President William C. Powers, Jr.
The University of Texas at Austin
Office of the President
P.O. Box T
Austin, Texas 78713

Dear President Powers,

We have completed our audit of Health Insurance Portability and Accountability Act (HIPAA), Security Rule – University Health Services (UHS). Our scope included applicable IT controls within UHS.

Based on the audit procedures performed, it appears that UHS is in compliance with HIPAA Security Rule guidelines. No recommendations were necessary.

We appreciate the cooperation and assistance of UHS throughout the audit and hope that the information presented herein is beneficial.

Sincerely,

[Signature]

Michael W. Vandervort, CPA
Director

cc: Internal Audit Committee Members
    Jamie Shutter, Director, University Health Services
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EXECUTIVE SUMMARY

Conclusion
Based on the audit procedures performed, it appears that University Health Services (UHS) is in compliance with the Health Insurance Portability and Accountability Act (HIPAA) Security Rule guidelines. No recommendations were necessary.

Audit Scope and Objective
The scope of this audit included applicable information technology controls within UHS. The specific audit objective was to determine whether UHS is in compliance with HIPAA Security Rule guidelines.

Background Summary
Title II of HIPAA defines policies, procedures, and guidelines for maintaining the privacy and security of individually identifiable health information. The Department of Health and Human Services’ Administrative Simplification of HIPAA’s Security Rule specifically relates to electronic protected health information and requires appropriate security standards to ensure the confidentiality, integrity, and security of electronic protected health information.

UHS provides comprehensive general and urgent health care services to students at The University of Texas at Austin, as well as a few other services (such as physical therapy and immunizations) to students, faculty, and staff. As part of its operations, UHS works with protected health information. The fiscal year 2015 budget for UHS is $9.5 million.

This audit was conducted as part of the Fiscal Year 2014 Audit Plan, based on risk identified in the annual risk assessment.
BACKGROUND

Title II of the Health Insurance Portability and Accountability Act (HIPAA) defines policies, procedures, and guidelines for maintaining the privacy and security of individually identifiable health information. The Department of Health and Human Services provides an Administrative Simplification of Title II and divides its requirements into the following areas:

- The Privacy Rule — requires appropriate safeguards to protect the privacy of personal health information and regulates the use and disclosure of this information;
- The Security Rule — establishes standards to protect individuals' electronic personal health information that is created, received, used, or maintained by covered entities;
- The Breach Notification Rule — requires notifications following a breach of unsecured protected health information;
- The Transactions and Code Sets Standards — standardizes health care transactions;
- Identifier Standards for Employers and Providers — require the use of standardized identification numbers; and
- The Enforcement Rule — relates to compliance and investigations and sets civil monetary penalties for HIPAA violations.

The focus of this audit is with the Administrative Simplification of the Security Rule. The Security Rule specifically relates to electronic protected health information and requires appropriate administrative, physical, and technical safeguards, as well as organizational requirements, policies and procedures, and documentation to ensure the confidentiality, integrity, and security of electronic protected health information.

University Health Services (UHS) provides comprehensive general and urgent health care services to students at The University of Texas at Austin, as well as a few other services (such as physical therapy and immunizations) to students, faculty, and staff. As part of its operations, UHS works with protected health information. The fiscal year 2015 budget for UHS is $9.5 million.

SCOPE, OBJECTIVES, AND PROCEDURES

The scope of this audit included applicable IT controls within University Health Services. The specific audit objective was to determine whether University Health Services is in compliance with the Health Insurance Portability and Accountability Act Security Rule guidelines.

To achieve this objective, we:

- Gained an understanding of UHS’ IT environment and the IT controls in place for the UHS systems storing electronic protected health information;
• Reviewed current documented policies and procedures in UHS related to HIPAA Security Rule guidelines;
• Reviewed the results of a network vulnerability scan; and
• Tested a sample of computers within UHS.

This audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing and with Government Auditing Standards.

AUDIT RESULTS

The HIPAA Security Rule consists of required and addressable implementation specifications in the following areas:
• Administrative Safeguards,
• Physical Safeguards,
• Technical Safeguards,
• Organizational Requirements, and
• Policies and Procedures and Documentation Requirements.

The IT controls in place for the UHS systems storing electronic protected health information and the relevant documented policies and procedures appear to adequately meet the implementation specifications listed in the HIPAA Security Rule.

CONCLUSION

Based on the audit procedures performed, it appears that University Health Services is in compliance with the Health Insurance Portability and Accountability Act Security Rule guidelines. No recommendations were necessary.