

PURPOSE

The purpose is to establish the policy and procedure for the Michigan Department of Health and Human Services (MDHHS) operations to ensure that regular review of records of information system activity such as audit logs, activity reports and security incident tracking are evaluated as an ongoing process to improve the quality of MDHHS operations.

REVISION HISTORY

Reviewed: 01/01/2024.

Next Review: 01/01/2025.

DEFINITIONS

ePHI is the acronym for Electronic Protected Health Information. It is Protected Health Information that is transmitted or maintained in electronic form.

PHI is the acronym for Protected Health Information. It is information that can identify a person and contains health related data pertaining to that person.

Sensitive or Sensitive Information is information that is considered proprietary, can be used to identify an individual (Personally Identifiable Information or PII), is protected by a federal or state confidentiality law other than HIPAA, or is provided to MDHHS by a federal, state, or other business partner on the condition that it be kept confidential.

Workforce Member means employees, volunteers and other persons whose conduct, in the performance of work for a covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity. This includes full and part time employees, affiliates, associates, students, volunteers and staff from third party entities who provide service to the covered entity.

POLICY

MDHHS shall establish a periodic internal auditing procedure in conjunction with the Department of Technology Management and Budget (DTMB) to periodically review records of system activity. The internal audit procedure may utilize audit logs, activity reports, or other such mechanisms to document and manage system activity.

Audit logs, activity reports, or other mechanisms used to document and manage the system activity must be reviewed at intervals

parallel to the associated risk of the system or the sensitive or ePHI contained in that system. An audit control and review plan must be created by the system owner and approved by the MDHHS Security Officer.

PROCEDURE

Office of Financial Management

Performs a periodic review of information systems activity, as required by the Michigan Administrative Guide, Procedure 1270.12 and by the HIPAA Security Rule under 164.308(a)(1).

Department of Information Technology Internal Auditor

Perform a periodic review of information systems activity, as required by the Michigan Administrative Guide, Procedure 1270.12 and by the HIPAA Security Rule under 164.308(a)(1).

MDHHS Security Officer

Perform a periodic review of information systems activity as required by state and federal rules, including the Michigan Administrative Guide, Procedure 1270.12 and by the HIPAA Security Rule under 164.308(a)(1).

Review audit logs and activity reports at periodic intervals corresponding to the associated risk of the system or the sensitive or ePHI contained in that system.

Approve an audit control and review plan created by the division director or section supervisor/manager.

DTMB

Create audit logs and activity reports used to document and manage system activity for MDHHS Security Officer's review.

Division Director or Section Supervisor/Manager

Create an audit control and review plan which is approved by the MDHHS security officer.

The plan must include:

- Systems and applications to be logged.
- Information to be logged for each system.
- Applications that will be used for logging.

- Procedures to review all audit logs and activity reports.
- Procedures for dissemination of the information and on what timeline.

Workforce Member

Security incidents such as activity exceptions and unauthorized access attempts must be detected, logged and reported immediately to the appropriate system management, workforce member supervisor and MDHHS security officer.

REFERENCES

45 CFR 164.308(a)(1)

DTMB 1270.12: Monitoring of Internal Controls Related to Information Technology

CONTACT

For more information regarding this policy, contact the MDHHS Compliance and Data Governance Bureau at MDHHSPrivacySecurity@michigan.gov or 517-284-1018.