

**PURPOSE**

The purpose is to establish the policy for the Michigan Department of Health and Human Services (MDHHS) to ensure that MDHHS has processes or procedural mechanisms in place that record, examine and maintain activity in information systems that contain or use Electronic Protected Health Information (ePHI).

**REVISION HISTORY**

Issued: 11/02/2006  
Revised: 01/01/2016  
Reviewed: 01/01/2017  
Next Review: 01/01/2018

**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.

**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**

It is the policy of MDHHS to conduct periodic reviews of workforce member access to information systems, periodic revalidation of workforce member access privileges, automatic logs of activities and automatic logs of failed attempt or intrusions where possible.

MDHHS shall comply with the Department of Technology, Management and Budget 1280.01 Auditor General Audit Process and prepare annual internal audit plans.

MDHHS shall comply with Department of Technology, Management and Budget Monitoring of Internal Controls Related to Information Technology Procedure 1270.12.

**REFERENCES**

45 CFR 164.312(b)

DTMB 1280.01 Auditor General Audit Process

DTMB 1270.12 Monitoring of Internal Controls Related to Information Technology (IT)

**CONTACT**

For additional information concerning this policy, contact the MDHHS Compliance Office at [MDHHSPrivacySecurity@michigan.gov](mailto:MDHHSPrivacySecurity@michigan.gov).