I. **POLICY STATEMENT**

It is the policy of CEHS to ensure that all individuals or entities that access CEHS EPHI information systems have been appropriately authenticated.

II. **DEFINITIONS**

See HIPAA Privacy Policy 100

III. **AUTHORITY AND RESPONSIBILITIES**

CEHS has component units that are listed as a hybrid entity in accordance with USU’s HIPAA Hybrid Covered Entity Declaration. Only the Health Care Component/HCC (i.e., covered functions) of CEHS must comply with this policy. All references in this policy to “CEHS” shall be construed to refer only to the health care component of CEHS.

IV. **PROCEDURES TO IMPLEMENT**

1. Workforce members seeking access to any network, system, or application that contains EPHI must satisfy a user authentication mechanism such as a unique user identification and password or biometric input to verify authenticity before being given access to information systems. In addition, whenever a person or entity is authorized to access such information, only the minimum necessary access needed to perform their designated function is to be authorized.

2. Workforce members seeking access to any network, system or application must not misrepresent themselves by using another person’s user ID and password, token or other authentication information.

3. Workforce members are not permitted to allow other persons or entities to use their unique user ID, password, token or other authentication information.

4. A reasonable effort must be made to verify the authenticity of the receiving person or entity prior to transmitting EPHI.

5. When an external user accesses applications or data, authentication requires a user ID and stronger authentication mechanisms. External authentication is accomplished through multiple/layered user ID’s and passwords through virtual private network (VPN), and similarly secure authentication methods.
6. When any user is authorized to access confidential information, including EPHI, at the application level, that application must possess dual authentication capabilities.

V. ATTACHMENTS
N/A

VI. REFERENCES
45 CFR §164.312(d)