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User access monitoring: What should you be doing

by Marti Arvin JD, CHC-F, CCEP-F, CHPC, CHRC

It is helpful to occasionally reassess the processes covered entities use to meet compliance obligations under HIPAA regulations. One of those is user access monitoring. This is not a term used in HIPAA regulations; however, guidance from U.S. Department of Health & Human Services Office for Civil Rights (OCR) clearly identifies user audit controls as necessary.[1]

Under the HIPAA Security Rule, covered entities and business associates have an obligation to have policies and procedures in place to prevent, *detect,* contain, and correct security violations.[2] The regulations also require covered entities and business associates to "Implement procedures to *regularly* review records of information security system activity, such as audit logs, access reports and security incident tracking reports."[3] It also dictates the implementation of hardware, software, and/or procedural processes that record and examine activity in information systems containing electronic protected health information (ePHI).[4]

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