

ADMINISTRATIVE POLICY

Subject: Information Security	Page 1 of 3	Policy # Version: 1.0
Title: Authorization & Access Control Policy	Revision of: New policy	Effective Date: 2/28/18
		Removal Date:

I. PURPOSE

This policy and procedure establishes the requirements to ensure authentication and access to electronic Protected Health Information (ePHI) and personally identifiable information (PII) is approved and sufficient to enable faculty, staff, students and contracted 3rd parties to perform their duties while maintaining compliance with Northwestern University (NU) policies.

The [NU Data Access Policy](#) which includes the Standards of Data Classification (e.g., Legally/Contractually Restricted Information) will continue to apply to the Feinberg School of Medicine (FSM).

II. PERSONS AFFECTED

All NU FSM faculty, staff, students, individuals with affiliate NetIDs, contracted 3rd parties and medical residents and fellows.

III. POLICY STATEMENT

Authentication to electronic systems will be performed via individually assigned [NU NetIDs](#). [Complex passwords](#) are required and [multi-factor authentication](#) will be used where ePHI is held and is technically feasible.

For administrative data, access to information must be maintained consistent with a need to know, the individual's job responsibility/role and approved by the individual's administrative manager. For job transfers or changes in job responsibilities, access will be updated in a reasonable period of time as agreed between the administrative managers of the respective departments, schools or institutes.

For NU IRB approved research human subject research, access to information must be maintained consistent with the Authorized Personnel List and approved by the Principal Investigator. Upon termination of employment or job transfer, updates to the Authorized Personnel List should occur no later than the effective date of the employee status change.

For all employment terminations, regardless of circumstance, access to data must be removed no later than the effective date of employment status change.

For NU IRB-approved research categorized as Not Human Subject Research, access to research information must be maintained consistent with a need to know, the individual's job responsibility/role and approved by the Principal Investigator.

In addition, third party (e.g., covered entities, Universities, Federal or State agencies) policies and procedures for accessing their research and/or patient information must be followed and approved by the NU Principal Investigator.

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Access which overrides system controls must be restricted and tightly controlled to a limited number of key individuals.

For systems that hold ePHI, a documented annual access review must be conducted by the Principal Investigator or owner of an application system. Although updates and removals to access should be completed as personnel changes occur throughout the year, the annual review verifies that access is still appropriate as defined by this Policy.

Any exceptions to this Policy must be documented in writing and approved by the FSM IT Steering Committee.

IV. PROCEDURE STATEMENT

NU Procedures to enable and disable access to NU-enterprise systems (e.g., myHR) via the NU NetID are aligned to the hiring, transfers, and terminations of personnel as defined by NU Human Resource Policy.

Life cycle management of NU NetIDs using functional or service-named accounts are defined by NU NetID procedures.

Provisioning

Access to FSM-wide systems, managed through the Dean's office or through a FSM department or institute, will require written authorization by the administrative manager, department administrator or Principal Investigator as defined by this Policy. Approved authorization should be recorded in the approver's email or in a request sent to FSMHELP@northwestern.edu.

Resignations, Terminations

For routine resignations, the administrative manager will send a request for de-provisioning to FSMHELP@northwestern.edu to ensure access to the user's NetID, network, file shares and FSM-wide systems is revoked. The administrative manager and department administrators, where applicable, will coordinate the removal of access to FSM departmental systems and third party external systems (e.g., NIH systems).

Where employment is terminated for cause, the administrative manager will follow the Human Resources procedure for such terminations, which includes de-provisioning..

All types of de-provisioning requests should be recorded in the requestor's email or in requests sent to FSMHELP@northwestern.edu.

Transfers

Updates to access between a former position and new position may include removal of some access and addition of new access. The procedures noted above for resignations and provisioning will be followed. The administrative managers of the former and new positions will coordinate the transitioning of access in a manner which is timely and non-disruptive to administrative, education, and research operations.

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V. POLICY UPDATE SCHEDULE

Policy review to occur one year after initial implementation and every three years thereafter.

VI. REVISION HISTORY

2/28/18 – New policy effective.

VII. RELEVANT REFERENCES

NU Data Access Policy

<http://www.it.northwestern.edu/policies/dataaccess.html>

Feinberg Information Security & Access Policy

<http://www.feinberg.northwestern.edu/it/policies/information-security/fsm-policy-security.html>

NU NetID Privileges

<http://www.it.northwestern.edu/policies/acctprivs.html>

NU Validate: Identity Management System

<http://www.it.northwestern.edu/auth-svcs/nuvalidate.html>

NU NetID and Passwords

<http://www.it.northwestern.edu/netid/index.html>

NU Multi-factor Authentication

<http://www.it.northwestern.edu/security/multi-factor-authentication/>

NU Workforce Clearance

http://www.northwestern.edu/hr/policies-forms/policies-procedures/NU_Staff_Handbook.pdf

NU Employment Termination Checklist

http://www.northwestern.edu/hr/policies-forms/forms/seperating-employees/employment_termination_checklist.pdf

NU NetID Expiration

<http://www.it.northwestern.edu/netid/expiration.html>

Rights and Responsibilities for the Use of Central Network and Computing Resources at Northwestern University

<http://www.it.northwestern.edu/policies/responsibilities.html>