

	Point to Point VPN Establishment Procedure
November 13, 2008	UCMC IT Risk and Security

1.0 Overview

The following procedure shall be followed when establishing a Point-to-Point (P2P) Virtual Private Network (VPN) connection between The University of Chicago Medical Center (UCMC) and any UCMC vendor or Business Associate. Adherence to these procedures is the responsibility of the UCMC IT Project Manager or Business Owner submitting the request.

2.0 Purpose

These procedures provide a standard process for establishing a P2P VPN connection between The University of Chicago Medical Center and UCMC vendor, or Business Associate. Additionally, the procedures shall ensure that the UCMC considers and, when appropriate, addresses issues involving patient privacy and information security.

3.0 Scope

The P2P VPN Procedure applies to all P2P VPN connections providing access to the UCMC network or information systems.

4.0 Procedures

- 4.1 The UCMC IT Project Manager or Business Owner shall initiate the process by contacting the Chicago Biomedicine Information Services (CBIS) Help Desk at ext. 2-3456. The Help Desk shall create a ticket to establish a P2P VPN connection and assign the task to CBIS IT Risk & Security (ITRS).
- 4.2 ITRS will assign a point person and provide the UCMC P2P VPN Package of written documents to the UCMC IT Project Manager or Business Owner.
- 4.3 The ITRS point person will work with the Project Manager or Business Owner to facilitate the completion of the VPN materials.
- 4.4 The package includes the following documents:
 - 4.4.1 VPN Process Checklist
 - 4.4.2 Business Associate Agreement (BAA)
 - 4.4.3 Third Party Connection Agreement
 - 4.4.4 UCMC Request for Information
 - 4.4.5 Business Partner Request for Information
- 4.5 If the UCMC already has a signed BAA with the vendor, attach a copy of the BAA to the Third Party Connection Agreement.
- 4.6 The completed documents must be signed by the requesting department Vice President and responsible party seeking the VPN.
- 4.7 The IT Project Manager or Business Owner must return the completed forms to ITRS for review. Hard and soft copies of the completed forms are required. Please email the soft copies to itrs@uchospitals.edu

- 4.7.1 ITRS shall review the documents and submit them to the HIPAA Program Office for its review. The submission from ITRS will include a risk assessment.
- 4.7.2 ITRS shall contact the HIPAA Program Office and request that the VPN request be included on the HIPAA FAQ Team agenda.
- 4.7.3 The HIPAA Program Office shall include the VPN request on the HIPAA FAQ Team agenda. The Team is scheduled to meet on the 1st and 3rd Monday of each month and will review the VPN request and documents.
- 4.7.4 The IT Project Manager, Business Owner, and ITRS personnel must be present at the HIPAA FAQ Team meeting to discuss the VPN request and answer questions. The HIPAA Program Office will notify all relevant parties of the meeting date, time, and location.
- 4.7.5 During the meeting, the HIPAA FAQ Team will review the documents and question the presenters. Based on the information, the Team will approve the VPN connection, deny the VPN connection, or request additional information.
- 4.7.6 The HIPAA FAQ Team must approve all P2P VPN connections before they are configured and implemented.
- 4.8 The HIPAA Program Office shall communicate its decision to all applicable parties via email. Please allow 4 weeks from the date of submission to ITRS to establish the P2P VPN.

5.0 General

If the “Third Party Connection Agreement” needs to be changed, it must be submitted to UCMC Legal Affairs for review. This includes any change that provides additional access to UCMC information systems or protected health information.

UCMC ITRS is responsible to ensure that technical controls are put in place to adhere to VPN access as described in the Third Party Connection Agreement.

The HIPAA FAQ Team is responsible for validating the business need for and identifying any risk associated with establishing the VPN connection.

6.0 Guidelines

7.0 Definitions

Terms	Definitions
UCMC	University of Chicago Medical Center
UoC	University of Chicago
ITRS	Information Technology Risk and Security
BAA	Business Associate Agreement
VPN	Virtual Private Network

8.0 Revision History

Date	Revision	Author
1/30/2006	Creation Point to Point VPN Procedures	
7/24/2006	Revised submission process	
9/3/2008	Revised Procedures	Bob Gross
10/7/2008	Insert a new 4.7.2 and renumbered subsequent items	Bob Gross

9.0 Point to Point VPN Establishment Procedure Review and Acceptance

Date	Acceptance
10/13/2008	HIPAA FAQ Team and UCMC Information Security