

 <p>Category: Information Technology</p> <p>Policy applicable for: Faculty/Staff/Student</p>	<p><i>Policy Title:</i> UC HIPAA Policy</p> <p>Effective Date: 01/04/2008</p> <p>Prior Effective Date: N/A</p> <p>Enabling Acts: ISO 27001/17799, COBIT, UC Policy, HIPAA, FERPA</p>	<p><i>Policy Number:</i> 9.1.10</p> <p>Policy Owner: General Council, UC College of Medicine</p> <p>Responsible Office(s): Information Security</p>
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Background

The University of Cincinnati includes departments and affiliates that handle information covered by the requirements of [The Health Insurance Portability and Accountability Act of 1996 \(HIPAA\)](#).

Policy

- The University of Cincinnati itself is not a covered entity per HIPAA definitions. Therefore, it is not required to have an overarching HIPAA policy
- Certain affiliates and subsidiaries of the University do perform HIPAA covered functions (student health, health insurance, and Hoxworth). Each of these entities must have their own internal HIPAA policy in place that addresses the specific needs and issues of that UC organization.
- In particular, the College of Medicine has numerous close affiliations with covered entities (the Health Alliance, the Physician Practice Corporations, etc.). These organizations commonly use IT infrastructure provided and/or supported by UC personnel.
- UC personnel will not transmit unencrypted e-PHI outside of the UC infrastructure

UCit and related IT organizations should provide technological assistance and support to the covered entities on a cost recovery basis to allow them to operate in compliance with HIPAA. This includes:

- Infrastructure that allows for business critical PHI classified data to be shared between organizations using the data sets provided by HIPAA.
- Applications and/or appliances that support the affiliate agencies attempt to protect the confidentiality and integrity of data in transit both within the confines of UC and to external locations.

Audience:

This policy applies to all organizations and individuals associated with the University of Cincinnati.

Definitions:

HIPAA: The Health Insurance Portability and Accountability Act of 1996

PHI: Protected Health Information

ePHI: Electronic Protected Health Information

Procedure:

ISO 27001/17799	International Standards Organization for Information Security
COBIT 4.0	ISACA Audit Controls Objective for IT
UC Policy	General Policy on the Use of Information Technology

UC Policy	Information Technology Management Policy
UC Policy	Information Security Policies
HIPAA	Health Insurance Portability and Accountability Act
FERPA	Family Educational Rights and Privacy Act

Related links:

- [International Standards Organization 17799:2005](#)
- [Control Objectives for IT](#)
- [UC Policy - General Policy on the Use of Information Technology](#)
- [UC Policy - Information Technology Management Policy](#)
- [UC Policy - Information Security Policies](#)
- [Health Insurance Portability and Accountability Act](#)
- [The Family Educational Rights and Privacy Act](#)

Phone Contacts:

UC Information Security	8-ISEC
Director, Information Security	6-9177
UC Office of the CIO	6-2228

Disciplinary Actions:

Violation of this policy may result in revocation of network access for the effected system(s). Violation of this policy may result in disciplinary action which may include termination for employees and temporaries; a termination of employment relations in the case of contractors or consultants and dismissal for interns and volunteers. Additionally, individuals are subject to loss of University of Cincinnati Information Resources, access privileges, civil, and in some cases criminal prosecution.