HIPAA Policy and CALEA Stance
Compliance (CM) Section 7.0

UC HIPAA Policy Principle

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). Objective The purpose of the UC HIPAA Policy is to (1) communicate that the University of Cincinnati is aware of the requirements of HIPAA compliance and as necessary it will provide the tools and technologies to assist covered UC affiliates with that compliance. Audience The UC HIPAA Policy applies to any UC organization that may provide technology or support of a technology or process required to allow the appropriate departments and affiliates of University of Cincinnati to comply with the requirements of HIPAA.

SM7.0.1 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.

SM7.0.2 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 attempts to protect the confidentiality and integrity of data in transit both within the confines of UC and to external locations.

Definitions

HIPAA - Health Insurance Portability and Accountability Act of 1996

PHI – Protected Health Information

ePHI – Electronic Protected Health Information
Federal Wiretapping requirements

- Broadband internet access providers must have tools in place that allows Federal law enforcement to listen to telephone conversations taking place over the internet via the providers' networks, so called voice-over-IP calls.
UC’s access to the internet is provided by OARnet. OARnet is the provider for CALEA purposes