

### HIPAA/PRIVACY AND SECURITY OF CONFIDENTIAL DATA

([See Appendix A for Policy](#))

#### CONFIDENTIAL DATA

The University of Connecticut School of Medicine (UConn SOM) and affiliated sites have policies and procedures governing the privacy and security of confidential data (including but not limited to patient's personal health information). These policies also establish requirements for the security and appropriately controlled release of all such information, consistent with applicable federal and state laws, including the federal privacy rule.

Residents and fellows must abide by the policies and procedures governing privacy and security of confidential data at UConn as well as at all affiliated sites.

*Confidential data* is defined in UConn Health's Confidentiality Policy linked here:

[https://health.uconn.edu/policies/wp-content/uploads/sites/28/2015/07/policy\\_2002\\_43.pdf](https://health.uconn.edu/policies/wp-content/uploads/sites/28/2015/07/policy_2002_43.pdf)

Security of *Confidential data* is governed by policy which defines the acceptable use of UConn Health electronic resources with respect to confidential electronic data. This policy is linked here:

[https://health.uconn.edu/policies/wp-content/uploads/sites/28/2015/07/policy\\_2011\\_02.pdf](https://health.uconn.edu/policies/wp-content/uploads/sites/28/2015/07/policy_2011_02.pdf)

In the course of the resident's/fellow's employment, the resident/fellow may be granted access to various types of *Confidential data*, including but not limited to:

- Patient information that is protected by both Connecticut and federal laws, such as the Health Insurance Portability Accountability Act ("HIPAA").
- Sensitive UConn Health information not in the public domain
- Financial information (budgets, strategic revenue plans, accounts receivable/payable details)
- IDs and/or Passwords for access to UConn Health computing resources
- Research data requiring protections

#### PATIENT INFORMATION

*Confidential data* about patients specifically includes, but is not limited to, information relating to a patient's medical file and the physical or mental health condition, medical history or medical treatment of the patient or a member of the patient's family that is obtained by the resident/fellow, another medical professional, a medical care institution or other related institution. This includes patient information contained in written, oral or electronic form.

Residents/fellows shall not access or disclose such confidential patient information except as may be required in the course of employment and as may be permitted by the applicable policies or procedures of any site in which the resident/fellow may train. Moreover, residents/fellows shall not have or gain access to confidential patient information, except as required, without prior authorization that complies in all respects with both Connecticut and federal laws, such as HIPAA. UConn Health has specifically developed a policy to guide residents/fellows in the use of patient data for their educational purposes. The policy on "The Use of PHI in Education" is linked here: [https://health.uconn.edu/policies/wp-content/uploads/sites/28/2015/07/policy\\_2014\\_07.pdf](https://health.uconn.edu/policies/wp-content/uploads/sites/28/2015/07/policy_2014_07.pdf)

Patients have a right to the privacy and security of their protected health information (that is, the right to control access to and the release of their protected health information). Residents/fellows have a

## Residents/Fellows Policies and Procedures Manual

responsibility to keep secure and confidential the information collected about patients during their encounters with healthcare professionals. Releasing parts or all of that information is appropriate under certain circumstances, such as when treating the patient, providing for continuity of care, participating in approved research and educational activities, complying with laws, and assuring reimbursement for services provided. Such releases provide a benefit to the patient and/or to society.

UConn Health's Privacy and Security Policies linked here provide guidance to residents/fellows to assure patient rights are protected:

<https://health.uconn.edu/policies/policies-specific-areas/specific-area-hipaa-privacy/>

<https://health.uconn.edu/policies/policies-specific-areas/specific-area-hipaa-security/>

Revised 4/16, 5/17, 9/17, 11/17, 4/19