

# UConn HEALTH

**POLICY NUMBER 2003-01**

**October 8, 2013**

**POLICY: HIPAA COMPLIANCE DATE  
(PRIVACY & SECURITY OF PROTECTED HEALTH INFORMATION  
(PHI))**

**PURPOSE:**

To document UConn Health compliance with applicable requirements of Title 45 CFR Part 164.534, Compliance date for the initial implementation of the privacy standards, as amended; and Title 45 CFR Part 160.310, Responsibilities of Covered Entities.

**SCOPE:**

Applies to all UConn Health workforce:

- Employees (including faculty and staff)
- Volunteers
- Students and residents
- Temporary staff
- Agency and contracted staff
- Credentialed staff
- Members of the Board of Directors

**POLICY STATEMENT:**

- A. UConn Health will comply with the applicable requirements no later than April 13, 2003.
- B. UConn Health will keep records and submit compliance reports as required by the U.S. Secretary of the Department of Health and Human Services.
  - UConn Health will cooperate with the complaint investigations and compliance reviews undertaken by the U.S. Secretary of the Department of Health and Human Services.
  - UConn Health will permit the U.S. Secretary of the Department of Health and Human Services access to facilities, books, records, accounts and other sources of information, including protected health information, that are pertinent to ascertaining compliance.

- For purposes of cooperation with DHHS investigations, UConn Health will attempt to obtain information in the exclusive possession of any other agency, institution, or person. If the other sources of information fail or refuse to furnish the information, UConn Health will document and certify what efforts it has made to obtain the information.

Reference: § 160.310, 164.534 Health Insurance Portability and Accountability Act of 1996 and as amended by HITECH on 1/25/13

Iris Mauriello (Signed)

10/28/13

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**Iris Mauriello**  
**Compliance Integrity/Privacy Officer**

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**Date**

Jonathan Carroll (Signed)

10/30/13

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**Jonathan Carroll**  
**Information Security Officer**

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**Date**

Frank M. Torti (Signed)

11/4/13

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**Frank M. Torti, M.D., M.P.H.**  
**Executive Vice President for Health Affairs**

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**Date**

**New Policy: April 14, 2003**  
**Revised: 3/28/05, 10/8/13**  
**Reviewed: 1/29/08 w/o changes**