



## Administrative Policy

### 2003-04 Business Associate Agreements

<b>Title</b>	Business Associate Agreements
<b>Policy Owner and Contact Information</b>	Office of Healthcare Compliance and Privacy <a href="mailto:privacyoffice@uchc.edu">privacyoffice@uchc.edu</a> Procurement and Contracts Department
<b>Campus Applicability</b>	UConn Health
<b>Applies to</b>	Any arrangement between UConn Health and/or one or more of its component entities (including, but not limited to, the UConn School of Medicine, UConn School of Dental Medicine, John Dempsey Hospital, UConn Medical Group, UConn Health Partners, University Physicians, and University Dentists) (collectively, "UConn Health") and an individual or entity with whom UConn Health has a Business Associate relationship.
<b>Effective Date</b>	12/18/2020

#### **PURPOSE:**

To ensure compliance with the Health Insurance Portability and Accountability Act of 1996 and the associated regulations (HIPAA) and the Health Information Technology for Economic and Clinical Health Act and the associated regulations (HITECH) when sharing Protected Health Information (PHI) with Business Associates.

#### **POLICY STATEMENT:**

UConn Health shall enter into a written Business Associate Agreement (BAA) with each of its Business Associates. A BAA must be fully executed before PHI is disclosed to a Business Associate.

#### **DEFINITIONS:**

**Business Associate:** A person or entity who acts on behalf of UConn Health to perform, or assist in performing, a function or activity that involves the use or disclosure of PHI and who is not an employee or a member of the UConn Health Workforce.

**Workforce:** Employees, volunteers, trainees, and other persons whose conduct, in the performance of work for UConn Health, is under the direct control of UConn Health, whether or not they are paid by UConn Health.

#### **PROCEDURES/FORMS:**

None

#### **REFERENCES:**

45 C.F.R. §§ 164.502(e) and 164.504(e) (HIPAA Privacy Rule)

#### **RELATED POLICIES:**

None

**ENFORCEMENT:**

Violations of this policy or associated procedures may result in appropriate disciplinary measures in accordance with University By-Laws, General Rules of Conduct for All University Employees, applicable collective bargaining agreements, the University of Connecticut Student Code, other applicable University Policies, or as outlined in any procedures document related to this policy.

**APPROVAL:**

Andrew Agwunobi (Signed)  
UConn Health Chief Executive Officer

12/18/2020

Kiki Nissen (Signed)  
Administrative Policy Committee Co-Chair

12/18/2020

Janel Simpson (Signed)  
Administrative Policy Committee Co-Chair

12/18/2020

**POLICY HISTORY:**

**New Policy Approved:** 4/14/03

**Revised:** 1/28/05, 12/18/20