



**IDAHO STATE
UNIVERSITY**

POLICY STATEMENT ON HIPAA

Concern about the privacy and confidentiality of health information led to the development of federal policies designed to protect the confidentiality of health information. The Health Insurance Portability and Accountability Act (HIPAA) was passed in 1996. Idaho State University is committed to protecting the confidentiality of protected health information and in complying with Federal and State regulations regarding protected health information. This document describes the policies of Idaho State University regarding protected health information.

Overview of Idaho State University

Idaho State University is a broad based-regional public university providing both general education and specialized programs and fulfills a community college role. The University offers certificates, associate, baccalaureate, masters and doctoral degrees, and post-doctoral residency programs. In addition to the broad based program offerings, the University serves as Idaho's lead institution for education in the health professions and related biological and physical sciences. Idaho State University delivers statewide comprehensive academic programming, professional continuing education, basic and applied research, and specialized public service in the health sciences.

Policy Statements:

1. Idaho State University serves a variety of functions; among these functions is the provision of health care and training of future health care providers. Due to the wide variety of functions, under HIPAA, Idaho State University is a covered entity designated as a hybrid entity engaged in health care activities as well as non-health care activities.
2. To ensure compliance with Federal and State regulation, Idaho State University has formed the University Privacy and Security Oversight Committee (UPSOC). The UPSOC is responsible for developing procedures to ensure compliance and to provide oversight over the privacy and security issues. A description of the makeup and function of UPSOC is available.
3. UPSOC will determine, through periodic annual review and monitoring, which individual departments, clinics, or units at Idaho State University are considered a Health Care Component (HCC) of the covered entity. All HCC's must comply with this policy and associated procedures.
4. An HCC is defined as a department, clinic, or individual who collects, creates, transmits, or maintains protected health information as a component of a patient-provider relationship.

5. Idaho State University will appoint a designated Privacy and Security Officer (PSO). The PSO will be chairperson of the UPSOC.
6. The PSO will be listed as a contact on all privacy notices, statements, and complaint forms.
7. HCC's shall use the University Notice of Privacy Practices which supercedes any individual HCC policies and procedures. Additions to the University Notice of Privacy Practices made by individual HCC's will permit the statements to meet the needs of the covered entity, i.e., local contact person and client versus patient. However, an HCC may not delete from the University Notice of Privacy Practices or alter the intent of the University Notice of Privacy Practices.
8. While Idaho State University has an accepted Notice of Privacy Practices, each HCC is responsible for posting it in their clinic and making a good faith attempt to provide each patient with the HCC's own Notice of Privacy Practices. Additionally, each HCC at Idaho State University is responsible for documenting and maintaining all associated records and signatures e.g., Patient Acknowledgement of Receipt of Notice of Privacy Practices.
9. HCC's are responsible for the training associated with maintaining the confidentiality of protected health information. The UPSOC and PSO will provide assistance and are responsible for providing updated information to HCC's.
10. Deans may select full time faculty or staff representatives from HCC's to serve as members of the UPSOC committee.
11. Each HCC shall designate a HIPAA liaison and alternate to function as the contact person for UPSOC and/or PSO communications. The liaison may also be listed on privacy notices, statements, and complaint forms.
12. The PSO may conduct periodic walk-through assessments of HCC clinics/units in order to document the University's compliance with HIPAA.

Current list of clinics/departments that are considered Health Care Components by the UPSOC:

Tier I list of HCC's: (Those clinics which create Protected Health Information and bill for services)

Counseling and Testing Services

Counseling and Testing - Idaho Falls

Counseling Clinic - Boise

Dental Hygiene Clinic

ISU Family Dentistry – Boise

ISU Psychology Clinic

Physical and Occupational Therapy Clinic

Pocatello Family Dentistry

Speech, Language, and Hearing Clinic

Audiology Clinic/SE Idaho Veterans Clinic Audiology Testing

Speech Language Pathology Clinic - Boise

Student Health Center

Student Health Center - Idaho Falls

Tier II clinics listed below do not have to comply with the University's Health Care Components' policies and procedures. However, Tier II clinics may be re-evaluated on a yearly basis or as circumstances change. If a clinic is determined by the University to be a Tier I status clinic, such clinic shall be required to comply with all applicable HIPAA Rules and University policies and procedures.

Tier II: (Those clinics which create PHI but do not bill)

Athletics

CTech - Center for New Directions

CTech - Dept. of Health Information Technology

Dental Hygiene - Boise

Family Counseling and Education Center

Idaho Dental Education Program

Institute of Rural Health

Nursing, Senior Health Clinic - closed

Nursing Senior Health Mobile Unit

Pharmacy Practice and Administrative Sciences

Pharmacy Practice, VA Medical Center

Pocatello Family Medicine - Clinic is part of Portneuf Medical Center

Radiographic Science

Social Work

Wellness Center, Health and Nutrition Sciences