

## University Privacy and Security Oversight Committee (UPSOC)

### Introduction

The standing University Privacy and Security Oversight Committee (UPSOC) is an internal group established to guide and oversee compliance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) (see *Committee Composition*). The primary function of the Committee is to assist campus Health Care Component (HCC) units/departments involved in providing services to students, faculty, staff, and the community at large. The UPSOC committee will assure that the University meets and maintains the standards outlined by HIPAA to ensure patient/client privacy and confidentiality needs related to the control, sharing, and security of personal health information. The University sponsors numerous HCC clinics and programs in the various health care profession arenas for the purpose of teaching and research, training of students, and the treatment of patients/clients. The exchange and transmission of personal health care information between campus, campus satellite locations, community, and other outside agencies are important processes experiencing constant change and evolution.

The Committee will specifically address or perform the following activities to maintain patient/client health information confidentiality:

1. Inform campus units/departments of changes in HIPAA standards on a timely basis and assist unit representatives in meeting compliance standards.
2. Initial and timely annual review of campus unit/department procedures and policies to ensure compliance with HIPAA guidelines.
3. Sponsor HIPAA update seminars, and other service learning to employees related to the continuation of compliance with standards.
4. Refer and/or recommend appropriate actions to University units not meeting HIPAA standards of compliance. (Following unit efforts to comply with requirements.)
5. Develop and implement a tracking system to ensure that all campus units/departments adhere to federal and state laws regarding HIPAA standards.
6. Communicate with University officers, the University General Counsel, other college committees, and other groups or individuals to coordinate activities related to HIPAA standard compliance.
7. Develop and submit to the Academic Vice President an annual summary report of Committee activities.
8. Provide guidance and minimum training to campus unit personnel in line with their level of HIPAA standard involvement.

## UPSOC - Committee Composition

The UPSOC is a governing group appointed by the Academic Vice President in conjunction with the Privacy and Security Officer (PSO). The Committee is limited to eight members, seven representing the units/colleges directly involved in clinical or other services identified under HIPAA guidelines and the PSO as the eighth member. Alternates from each unit/college are also appointed to maintain appropriate representation on the Committee during deliberations. In addition, University Computing shall appoint one *ex officio* member to confer with the PSO and the Committee on computer issues tied to the privacy and security of electronic data and related computer systems issues.

Committee memberships are staggered in three-year terms to provide fluency of transition for new members. Members and alternates can be reappointed for additional terms. The Committee will be chaired by the PSO who will serve in the primary leadership role and orchestrate committee functions and resources. The University General Counsel serves as a Committee resource. The Committee meets at least quarterly and may convene at other times dependent on priority agenda items. The Committee reports directly to the Academic Vice President or his designee.

