



The College at Brockport

Category:

Office of Human Resources

Responsible Office:

Human Resources

Policy Title:

HIPAA

Policy:

The College at Brockport is committed to protecting the privacy and confidentiality of health information of the campus community it serves. Health information is strictly confidential and should never be disclosed, nor confirmed to anyone who is not specifically authorized under the institution's policies or applicable law to receive the information.

Failure to adhere to state and federal law or the College at Brockport policies and procedures regarding the confidentiality of protected information will be considered a breach of confidentiality and will result in the imposition of appropriate sanctions.

This policy applies to all members of the College at Brockport community, whether directly employed by the institution or serving under an alternative arrangement. It shall include, but not be limited to:

- Employees
- Volunteers
- All students participating in a health related program (including medical interns and residents)
- Agency and contracted staff (including temporary staff)
- Consultants
- Contractors and subcontractors
- Faculty and credentialed staff

Procedure:

1. The College at Brockport is responsible for providing job appropriate training to its workforce regarding:
 - a) The need for confidentiality
 - b) Types of information that are considered confidential
 - c) Sanctions associated with a breach of confidentiality
 - d) The institution's confidentiality agreement
2. Each member of The College at Brockport's affected workforce will be expected to review and sign the confidentiality agreement. This will occur upon hire/affiliation. This signed statement will be maintained in the appropriate employee file.

3. Any and all breaches of confidentiality should be reported to the department supervisor. Failure to report a breach will be considered a violation of this policy. Investigation of a suspected breach of confidentiality will be done in concert with the College's privacy official or his/her designee.
4. Upon a finding of a breach of confidentiality by an employee in a collective bargaining unit, the College may initiate action pursuant to the applicable collective bargaining agreement.

Forms:

<http://www.brockport.edu/hr/forms/documents/confidentiality.doc>

Reference(s):

United States Department of Health & Human Rights: <http://www.hhs.gov/ocr/hipaa/>